

Strategic Aviation Special Interest Group (SASIG)

GDPR POLICY STATEMENT

Introduction

As a responsible organisation, SASIG takes data security extremely seriously and acknowledges that is essential to protect the business interests of all of our Clients and also, of course, ultimately, the reputation of SASIG. SASIG therefore recognises and accepts the General Data Protection Regulation (GDPR) will apply in the UK from 25th May 2018.

Our Clients are defined as Member Authorities, Associate Member Authorities, Members of Parliament and their staff and representatives, members of Government, Local Authority Councillors, Statutory Authorities, NGO's and all other contacts that have expressed an interest in SASIG and the work it undertakes or SASIG has a working and communications relationship with for whom we hold their personal contact data (Personal Information).

Accountability is a cornerstone of GDPR and this document demonstrates how SASIG complies with its principles and has appropriate policies and procedures in place.

GDPR requires that Personal Information be processed lawfully, fairly and in a transparent manner and used for specific, explicit and legitimate purposes. The data should be adequate, relevant and limited to what is necessary for the specified purpose, accurate and up-to-date, and processed in a secure manner.

Data Security

All Client and related activity data will be stored only on suitably protected office computers.

Data transfers by SASIG shall be by the following means:-

Password protected data portal.

Password protected zip files.

Password protected MS Office and PDF files.

Paper prints and reports.

Data received from Clients will be in the format to comply with the Client's data policy.

Data transfers will only be performed by SASIG Secretariat and/or by order of the Chairman.

Data Sources

SASIG obtains Client data from various sources:-

- a). From recognised authorised GDPR compliant source data providers.
- b). From SASIG Clients and member authorities.
- c). As a consequence of communications with potential Clients and interested parties.
- d). As a consequence of SASIG research projects.
- e). From request for information registrations from SASIG's website.

None of the data sources contain Personal Information such as bank account details etc. however bank account information from Clients will be recorded by our payments management partner in the administration of Client, membership and membership activities.

Other Personal Information may be included by Clients or sourced externally only if specifically required to conduct a particular project.

Data Purpose

Data provided by Clients or obtained from GDPR compliant sources will be used to conduct SASIG Activities.

Activities shall be of 'Legitimate Interest' defined under GDPR, i.e. about the work of SASIG and its Clients, news and information relating to the aviation and related industries, issues of interest to Clients and matters relating to the service or product provided, proposed or considered in the furtherance of the Client's business.

SASIG through its Executive will be defined and act as the Data Controller: the legal entity who, either alone or jointly or in common with other legal entities, determines the purposes for which and the manner in which any Personal Information is, or is to be, processed.

SASIG Secretariat will be defined and act as the Data Processor: the legal entity who processes the data on behalf of the Data Controller.

All of the Personal Information obtained shall be related to the Client's business (active, proposed or considered) and/or as a consequence of SASIG Activities.

It is unlikely that Personal Information used for business or research would contain Sensitive Personal Data. Where this is included or required as part of SASIG Activities it shall be defined with the Client such that security are agreed such that the data will be safe and cannot be used in a discriminatory way.

Data Protection Officer

The Primary Data Lead for SASIG is the Secretariat and they are responsible for SASIG Secretariat's compliance as a Data Processor. SASIG has not appointed a specific Data Protection Officer due to the nature of the data used or sourced, the limited automatic processing, the single purpose use of Personal Information, the nature of SASIG Activities as a Legitimate Interest, the internal controls established and the security of SASIG IT systems.

Consent

Personal Information provided to SASIG by clients for the purposes of SASIG Activities shall have the consent of the individual or Client, either implied by the provision of a service, or absolute as defined in the Client's Privacy Policy.

Personal Information provided to SASIG by GDPR compliance sources shall have the consent of the individual or business for that data to be used for SASIG Activities.

Any Client will have the opportunity to have their Personal Information removed from SASIG files

Data Subject's Rights

SASIG's computer files are arranged with unique Client ID's to assist processing of the data subjects' rights under GDPR.

Incident Response Plan

Should there ever be a data breach or other incident involving Personal Information the incident will be dealt with in a way that ensures that the Data Protection Authority or the Client or data subject will be informed as to the nature and scale of the breach, the action that has been taken, the potential impact on the Data Subjects, all within 72 hours of the discovery of the breach.

CONTRACT BETWEEN SASIG AND NEW MEMBER(S) (Clients)

SASIG will always confirm with new Clients their successful application. This will be by letter of confirmation sent either electronically or postal and will include SASIG's standard Terms and Conditions, Privacy Policy and this GDPR Policy Statement.

May 2018

PRIVACY IMPACT ASSESSMENT

Introduction

This Privacy Impact Assessment checklist details the parameters considered for the SASIG Activity.

1	Client:	
2	Project:	SASIG Newsletter, Programme communications and Activity invites with Clients.
3	Commencement:	Immediately.
4	Legitimate Interest:	Communication with Clients on matters of interest related to the aviation industry.

5	Project description:	
		SASIG Newsletter, Programme communications and Activity invites through website, email and postal communication to Clients on matters of interest related to the aviation industry and SASIG publications.
6	Details of Source Project Data:	
		SASIG Client database.
7	Details of Source Project Data Security Precautions:	
		Email communications will be sent individually ensuring no email address data leakage.

11	Data Controller:	SASIG Executive
14	Data Processor:	SASIG Secretariat
17	SASIG Privacy Policy:	Project compliant with Privacy Policy
18	Sensitive Personal Data	None included or required

This Privacy Impact Assessment checklist has been completed by SASIG Secretariat (Data Processor) and agreed by the SASIG Data Controller as a true record of the requirements, data security precautions and responsibilities of the parties.

Signed: _____

Signed: _____

Name:

Name:

Position:

Position:

Authorised signatory for:

Authorised signatory for :