

## **Strategic Aviation Special Interest Group: Privacy Policy**

This privacy policy is effective as of 25th May 2018.

The Strategic Aviation Special Interest Group of the Local Government Association (SASIG, or "we" or "us") is committed to respecting your privacy and protecting your Personal Information. However it is important to remember that no method of transmission over the internet, or method of electronic storage, is 100% secure.

Our privacy policy describes how we capture, retain and use the Personal Information that we gather about our Clients.

Our Clients are defined as visitors to our website, Member Authorities, Associate Member Authorities, Members of Parliament and their staff and representatives, members of Government, Local Authority Councillors, Statutory Authorities, NGOs 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.

Please read the following carefully to understand our views and practices regarding your Personal Information and how we will treat it.

SASIG uses your Personal Information primarily for communication purposes to our Clients and for providing and improving our website. By being a SASIG Client you agree to the collection and use of information in accordance with this policy. We may ask you to provide us with certain Personal Information that can be used to contact or identify you.

Personal Information may include, but is not limited to your name, employer, telephone and email details and contact address. The SASIG Executive acts as Data Controller in relation to all personal information and SASIG Secretariat the Data Processor.

If you have any questions, comments or complaints regarding our privacy policy or practices, please contact us at [secretariat@sasig.org.uk](mailto:secretariat@sasig.org.uk)

### **Communications:**

We may use your Personal Information to contact you with newsletters, newsflashes and other information that is deemed sufficiently beneficial for you to receive.

### **Changes to this Privacy Policy:**

This Privacy Policy is effective as of 25th May 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on the website.

## **Summary: Privacy policy if you visit our website:**

Our full Privacy Policy is below. In summary:

- Data about you is your Personal Information. We will only process it to provide our services to you.
- We will use the Personal Information that you provide to us or that we collect about you as described in this privacy policy to provide our services and to respond to your enquiries and to protect and improve our services and website.
- We may use your Personal Information to send you any communications relevant to SASIG. You can ask us to stop doing this at any time. You have other rights in relation to your Personal Information, such as the rights to access, amend or request the deletion of Personal Information that we hold about you, or in some cases to object to our use of it.
- We only share your information in limited circumstances, as we describe below.
- We apply high standards of security to all information that we hold, in line with industry best practice.

## **Privacy policy if you use our services or visit our website**

This policy applies to all Personal Information for which SASIG Executive is the Data Controller.

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### **1. The information we collect about you**

We collect information about you when you provide it to us, when you use our services and website, and when other sources provide it to us, as follows:

**Account information:** where you are a Client and / or subscribe to our organisation and its services, or create an account with us, we collect information from you such as your name and email address, username, phone number, address and organisation. We also ask for and collect Personal Information such as an email address and name from any individual that you authorise to use our services such as those responsibility for payments.

**Billing information:** where you need to make a payment to us for our services, we collect your billing details, including a billing address and financial and payment information.

**Information that you provide to us:** we collect the information that you give to us, for example when you:

- contact us by phone, email or otherwise.
- fill in forms on our website.
- register to use our website.
- sign up for our newsletters and promotions.
- respond to a survey run by ourselves (e.g. to get feedback on our own services).
- register or attend one of our events or workshops.
- participate in forums on our website.
- contact us for customer support.

**Usage information:** we may collect information about your usage of our services and in particular your use of our website including which webpages you view, the services you view or search for, your referring and exit pages, the length of visits to certain pages and the times and dates of these actions.

**Cookies:** we may use cookies to distinguish you from other users of our services and website. This helps us to improve our website's performance and your experience of using our website. You can control the use of cookies at the individual browser level. Some of those cookies are necessary for the use of our services. If you reject cookies, you can still use our website but your ability to use some features or areas of our website may be limited.

**Tracking:** when we send you emails, we may include tracking to allow us to determine the number of people who open our emails and information such as when and how many times the email was viewed, whether any links were clicked on and whether the email was forwarded. This helps us to measure the effectiveness of our communications. When you click on a link in an email, we may record this individual response to customise our offerings to you.

**Analytics:** We use Google Analytics to monitor site traffic.

**Information from other users:** other users of our services may provide us with information about you. For example, when another individual authorises you to use our services, they will provide us with your name and email address, or an individual in your organisation may provide us with your contact information if they designate you as the billing or technical contact on your organisation's account.

## **2. How we use your information**

We use the information that we hold about you in the following ways. For each of these, we have identified our legal basis for processing your information in that way.

**Providing our services:** We use your Personal Information to provide you with the services to which you have subscribed or requested. This may include providing you with member support and with the benefits of any auto-update feature associated with the relevant service. This processing is necessary to perform our contract with you for these services.

**To collect payment:** We use your Personal Information to collect fees due to us for your use of our services, in accordance with our legitimate interests of collecting revenue.

**Responding to enquiries:** We will use your contact information and any Personal Information that you send to us to respond to your questions, requests for information or complaints. Depending on the nature of your enquiry, we may do this on the basis of performing our contract with you, our legal obligations, or our legitimate interests of providing you with the best service and understanding how we can improve our services based on your experience.

**To protect our business, products, services and website:** we will use your Personal Information in accordance with our legitimate interests of administering and maintaining our systems and ensuring network and information security, for example to prevent unauthorised access to our networks, to investigate faults, to control the abuse of our services, to prevent denial of service attacks and to monitor system usage and server load.

**To develop, test and improve our services and website:** we will use your Personal Information about how you use our services and website to improve the user experience for our users, for example to ensure we are offering appropriate features, supporting appropriate browsers and devices and to ensure our website content is presented in the most effective manner. We do this on the basis of your consent to our use of cookies and in accordance with our legitimate interests of developing our existing services and website, understanding how we can continue to improve them, and creating new services.

**Monitoring and enforcing our rights:** we may use your Personal Information to ensure that you are using our products and services in accordance with the terms on which they are supplied, and to enforce those terms, our website terms of use, or other relevant agreements that we have with you, in accordance with our legitimate interests of being able to enforce our rights.

**Legal requests:** we may need to use your Personal Information to comply with a legal obligation such as to respond to a court order or a request from a supervisory authority or government, or to prevent fraud.

**Notifications:** we will use your Personal Information to send you communications which are required by law or to notify you of changes to our terms or this privacy policy, or changes (permanent or temporary) to our services. Such messages will not include any promotional content. Depending on the nature of the communication we may do this on the basis of performing our services or contract with you or complying with our legal obligations.

**Surveys and feedback requests:** we may use your Personal Information to invite you to participate in surveys run by us on our own behalf, for example to invite your feedback on our services and website. These communications will not contain any promotional content and will be sent on the basis of our legitimate interests of improving our services and website. However, if you would prefer not to receive such communications, please contact us at the Secretariat.

**Marketing:** we may use your Personal information to provide you with information about our services, offers and events that we consider may be of interest to you. This information will relate to our own services only, and we will not provide your Personal Information to third parties for marketing purposes. We send these communications either on the basis of your consent (where you have specifically consented to receiving such communications) or in accordance with our legitimate interests of growing our business.

**You may stop receiving communications from us at any time.** To withdraw your consent or to opt-out of receiving communications, you may contact us at the Secretariat or follow the unsubscribe instructions contained in the communication itself.

**Legal basis for processing (EEA only):** where your data is processed by SASIG or if you are an individual from the EEA, we must have a legal basis for collecting and using your Personal Information when we act as Data Controller. This will be one of the following:

- a. where we require the information to perform a contract with you (e.g. to offer or deliver the services that you have requested);
- b. where we have your consent to do so, and in this case you have the right to withdraw or refuse to give your consent at any time. This will not however affect the lawfulness of any processing based on your consent before you withdraw it;
- c. where the processing is necessary for our legitimate interests (and those legitimate interests are not overridden by your interests or fundamental rights and freedoms); or
- d. where we need to comply with a legal or regulatory obligation.

If you have any questions about or require further information concerning the legal basis on which we collect and use your Personal Information, including regarding our legitimate interests, please contact us at the Secretariat.

### **3. Who we share your information with**

We will only disclose your Personal Information in the circumstances below:

**Our service providers:** we may disclose your Personal Information to specific third party service providers in the course of providing our service to you. In each case we have agreements in place with the service provider to ensure that they provide appropriate protection for your Personal Information and to ensure that they are only permitted to use your Personal Information in accordance with our instructions and as necessary to provide the relevant service to us.

For example, we occasionally engage third parties to provide the following services:

- hosting our online survey services and our website.
- sending our Clients communications.

**Professional advisers:** we may need to disclose your Personal Information to our professional advisers, including our lawyers, bankers, auditors and insurers.

**Compliance with legal obligations and enforcement of our rights:** we may also have to disclose your Personal Information if this is reasonably required to:

- comply with any applicable law, regulation or legal process or to respond to a request from a government or a regulatory body.
- enforce our agreements, policies and website terms of use.
- protect the security or integrity of our products and services.

**Other users within your organisation:** where your organisation obtains services from us covering multiple authorised users and contacts, we may disclose your Personal Information to other users within your organisation, for example to verify licensing and billing information.

**Forums:** if you use any forums that may be on this website, you should be aware that any Personal Information you submit there can be read, collected, or used by other users of these forums, and could be used by them to send you unsolicited messages. We are not responsible for the Personal Information you choose to submit in these forums or for private messages that you send via the forum. To request removal of your Personal Information from our community forum, contact us at the Secretariat.

#### **4. Links to other websites**

This privacy policy covers our services and website. Our website may contain links to and from third party websites. The information practices and the content of such other websites are governed by the privacy policy of that website. If you click on a link to those websites you will leave our website to go to the website that you selected. Please note that we cannot accept responsibility or liability for any use of your Personal Information by such third parties, and we cannot guarantee that they will adhere to the same privacy practices as us. We encourage you to review the privacy policies of any third party before you submit any personal data to them.

#### **5. Updating your information**

If you wish to update, amend or request deletion of your Personal Information you may do so by making the change within your account once logged in or by emailing us at the Secretariat. We will respond to your request as soon as possible and certainly within 7 days.

## 6. Your rights as a data subject

If you have an account on this site, you can request to receive an exported file of the Personal Information we hold about you, including any data you have provided to us. You can also request that we erase any Personal Information we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

At your request we will provide you with information about whether we hold any of your Personal Information and provide a copy of this information to you. To request this information please contact us at the Secretariat. You may update, amend or request deletion of your Personal Information as described above.

Where your information is processed for any reason by SASIG or if you are from the EEA you may have the right to exercise additional rights available to you, including:

**Right of Erasure:** in certain circumstances you have the right to erasure of Personal Information held about you, although this may be qualified where e.g. it is necessary for that information to be retained for record keeping purposes or compliance with our obligations. If we are unable to comply with your request, we will explain why.

**Right of Rectification:** you have the right to have your Personal Information rectified if it is inaccurate or incomplete.

**Right to Object:** you have the right to request that we stop processing your Personal Information for marketing purposes, and can request that we stop processing your Personal Information for other purposes based on our legitimate interests. In some cases, we may be able to demonstrate that we have compelling legitimate grounds to continue to process your Personal Information.

**Right of Restriction:** you may have the right to request that we restrict the processing of your Personal Information (e.g. where you believe that the Personal Information we hold about you is inaccurate or unlawfully held).

**Right to Data Portability:** you may have the right to be provided with your Personal Information in a structured, machine readable and commonly used format and to request that we transfer the Personal Information provided by you to another data controller.

You also have the right to **withdraw consent** at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you would like to exercise such rights, please contact us at the Secretariat. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>.

## **7. How long we keep your information**

We will retain your Personal Information for as long as your account is active or as needed to provide our services or otherwise fulfil the purposes described in this policy, including for the purposes of satisfying any legal, accounting or reporting requirements. If you wish to delete your Personal Information at any time, please contact us at the Secretariat. If we are unable to comply with that request, for example because we need to retain some or all of your Personal Information to comply with a legal obligation, we will let you know and will explain why.

## **8. Security of your information**

We take the security of your Personal Information extremely seriously and, where possible, we always follow industry best practice. All information that you provide to us is stored securely. Where you use a password to access certain areas of our website such as the members' area you are responsible for keeping this password confidential. SASIG newsletters and other communications are sent to members via Mailchimp. Details of Mailchimp data security and privacy practices can be seen on their website at: <https://mailchimp.com/about/security/>

## **9. Changes to our privacy policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will post a notice on the homepage of our website, the login screens for our services, and/or we will send an email notification to our account holders. We will also keep prior versions of this policy in archive for your review.

**May 2018**