

Introduction

This is the privacy notice of Freedom Aviation Ltd with a registered office at c/o The Control Tower Cotswold Airport, Kemble, Cirencester, Gloucestershire, GL7 6BA. It is designed to inform you about how we collect and use your personal data, and is divided into the following sections:

1. What personal data do we collect?
2. Special categories of personal data
3. Legal basis for processing your personal data
4. Why we collect personal data
5. Disclosures to third parties
6. How we protect your personal data
7. Data Retention
8. Your Rights in relation to your personal data
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10. Our copyright statement
11. Changes to this privacy notice

We take our responsibility for the privacy and security of your personal data very seriously. This privacy notice tells you what to expect when we collect and process your personal data. We will ensure that:

- any personal data you provide to us is kept safe and secure;
- we will be clear about our reasons for collecting and processing it; and
- we will not do anything with it that you wouldn't reasonably expect.

You have the right to complain to the Information Commissioner's Office (ICO) if you have a concern about how we process your personal data and you can do this via [ICO Concerns](#).

Our Privacy Notice is set out below. Please read this with care; it describes how we will process your personal data and what we will use it for. If you have any questions or comments, please [contact us](#).

Contacting Us

If you have any enquiries, questions or concerns about the information contained in this privacy notice or more generally about how we collect and use your personal data, you can address these via email to info@freedomaviation.co.uk, in writing to the Director, Freedom Aviation, c/o The Control Tower Cotswold Airport, Kemble, Cirencester, Gloucestershire, GL7 6BA or by calling us on 07973322698.

1. What personal data do we collect?

There are several scenarios where we collect personal data about you. In most instances, these are where you choose to provide personal data to us. We set out the different scenarios below:

Joining the Flying Club

If you wish to join the flying club we will collect the following information to process your application:

- Your name (including title, first name and last name)
- Your contact details (including email address, address, town / city, post code and country)

- How you prefer us to communicate with you

Event booking / flying trips / Licence Renewals

If you book onto one of our events, we will collect the following information to inform you about the event, including times, content and venue:

- Your name (first name and last name)
- Your contact details (including email address and contact number)
- A copy of your passport (to submit GAR forms or obtain / renew a licence)
- A copy of your driving licence (to obtain / renew a licence)
- Your medical renewal date
- Your licence details (including licence number, date of issue and expiry date)
- Booking and/or attendance details
- Dietary requirements (where refreshment including lunch is provided)
- Billing details (if appropriate)
- How you prefer us to communicate with you

Subscribing to newsletters

If you subscribe to one of our newsletters, we will collect the following information to enable us to provide the requested service in a timely manner:

- Your name (first name and last name)
- Your email address

General enquiries:

If you submit a general enquiry to us, we will collect the following information to enable us to respond to your enquiry and contact you to provide any additional information:

- Your name (first name and last name)
- Your contact details (including email address, address and contact number)
- Any additional personal data you provide in your enquiry
- Your enquiry details

Job Applicants

If you apply for a role at Freedom Aviation, we will collect the following information to enable us to process your application efficiently and provide you with additional information:

- Your Name (forename, last name other names)
- Your title
- Your contact details (including address, town, county, post code, email address and contact telephone number)
- Other personal data (Including nationality, gender and date of birth)
- Special category data (used for monitoring purposes, including ethnic origin, religion and sexual orientation)
- Any additional information required to process your application (including a question on your right to work, any disability (optional), qualifications (secondary, further education or professional), career history, skills and experience for the role and where you saw the advertisement)

Where we request special category data, you have the option in each case to select 'other' or 'prefer not to say'.

If you are selected for interview then we have a legal obligation to collect and process information which proves your right to work including a work permit, copy of a passport or a copy of a visa, and will do so based on this legal obligation.

Social Media

Depending on your settings and the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access personal data about you from those accounts or services.

We use a third party service providers providing us with marketing services, to manage our social media interactions such as responding to general enquiries made to us or distributing useful information on advertising practice and compliance. If you send us a message through this medium that information will be stored on Hootsuite and securely deleted after 3 months. We do not share any of this information with any other third parties.

Through our website

Like most websites, we use "cookies" and other tracking technologies to help create a better experience for you when using it. Cookies allow a website to remember you; they are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields. For further information please see our **Cookie policy**

In addition, the type of device you're using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us and how you can control that.

2. Special categories of personal data

Data protection law defines special categories of personal data as personal data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs; or
- trade union membership;

These categories also include:

- genetic or biometric data processed for identification of individuals; and
- data concerning health, sex life or sexual orientation.

We will not ask you for this information, except if you apply for a job with us, at which point you can opt to 'prefer not to say'; however, you may provide some of this information in support of your enquiry to us or if you are undertaking a medical check flight. Where this is the case, we may ask you for your explicit consent to process that special category data unless we can rely on another lawful basis.

You can revoke your consent at any time by , emailing us at info@freedomaviation.co.uk or calling us on 07973322698; we may still process your personal data, under the basis of a legitimate interest to provide satisfactory information or service to you , having first removed the special category data. If you still wish us to proceed with your enquiry, with the special category data removed, we will do so.

3. Legal bases for processing your personal data

The legal bases we will usually rely on are:

- Legitimate interest;
- Legal;
- Consent.

Legitimate Interests

In most instances, individuals supply us with their personal data with the intention and expectation that we will process their enquiry or booking that they have made to us and provide them with a satisfactory outcome, and we therefore have a legitimate interest in processing their personal data for this purpose.

We have a legitimate interest in processing personal data provided to us in our role as a provider of services to our membership e.g. the facility to book time on aircraft, undertake flying training or undertake ground school training.

We also have a legitimate interest in contacting our members with information about flying excursions being provided from the club, useful information about aircraft availability or for the delivery of essential safety or regulatory information.

In certain instances, we will want to ensure that the personal data we hold on individuals is accurate. This is necessary for us when we are attempting to contact the membership in the most efficient manner possible, we normally ask you to maintain your personal data online through FSPro. However, we have a legitimate interest, where necessary, in accessing publicly available information

found on Companies House, Post Office's National Change of Address database, whois.com, websites and other reputable sources, to ensure that the records we hold about individuals is accurate.

We also have a duty to provide a safe working environment for our staff. We have a legitimate interest in processing personal data on individuals who behave in an unacceptable way towards our staff and we will, where we consider necessary and proportionate, restrict such individual's ability to communicate with us.

You have a right to object to your personal data being used based on legitimate interests. However, in most cases, we will not be able to deliver our services to you if you exercise this right to object.

Legal

We will process your personal data in accordance with appropriate safety and regulation requirements demanded by the Civil Aviation Authority (CAA). We will do this based on a legal obligation to provide the CAA with licensing information on our pilots.

Consent

Where we send you emails about our services or you sign up to our newsletters, we will only do so having collected your prior consent. You can withdraw your consent at any time.

4. Why we collect personal data

We collect personal data for the following purposes:

- To process your enquiries and event bookings that you make to us.
- To identify you in relation to requesting additional information or feedback about your booking of an event or service you have requested
- To comply with any safety or regulatory requirements from the CAA
- To keep a record of your relationship with us including general communications
- To ensure we know how you prefer to be contacted
- To provide you with information and access to services that you have requested from us or which we feel may be of interest to you.
- To process an application for a role at Freedom Aviation
- We may also use your personal data to detect and reduce fraud in order to protect our interests.

Membership / New Joiners

We collect, store and process the personal data you supply to us based on legitimate interest (please see further below) to handle, manage and provide you with services and useful information about events provided by Freedom Aviation.

Event Booking / Flying Trips

We will process personal data based on your legitimate interest when you book onto an event e.g. a ground school with us or a flying trip, and we will contact you with details of the event, the venue, location and timings.

Aircraft Booking

We will process your personal data based on a legitimate interest in providing the service of booking time on an aircraft from the flying club. We will also process some of your personal data e.g. name when you check the aircraft and complete the technical pre / post flight.

Pilot Training

We will process some of your personal data e.g. name based on a legitimate interest in recording progress during flying training; this record assists the instructional staff in reviewing your progress, recording any points where improvement is required.

Regulatory / Safety Reporting

We will process some of your personal data based on a legal obligation where we are required to report any safety breaches or regulatory requirements to the CAA; this will include documentation to obtain an initial issue of a licence, a rating renewal or any incident deemed reportable by the CAA. Where we process any information for these purposes we will tell you when we do so.

Direct Marketing

We will contact you (in accordance with your preferences especially where we are required to obtain your consent to use a particular marketing channel) with information and services as well as essential safety information from Freedom Aviation. We will not share your personal data with other organisations for marketing purposes. Our marketing communications have clear marketing preference questions, and we include information on how to opt out whenever we send you

marketing. If you don't want us to contact you, you can update your preferences at any time; this can be found in our 'How to stop hearing from us' section below.

Where you decide not to receive any direct marketing communications from us, we will add your name to our marketing suppression list; this will require the retention of a small amount of your personal data (e.g. name and email address) to make sure that your name can be excluded from any future mailings. If you have requested that your personal data be erased, we will retain this small amount of personal data on our suppression list and you will be advised accordingly.

Job Applications

If you have applied for a role at Freedom Aviation we will process your personal data based on legitimate interest, provided at the point of application. The application process asks for some special category data (e.g. religious or philosophical beliefs, race or ethnic origin, sexual orientation and disability) but you do not have to supply this and can select 'other' or 'prefer not to say'; if you do supply this information we will contact you to gain your explicit consent to do so.

General Enquiries

If you submit an enquiry to us we will process the personal data that you provide based on a legitimate interest in responding to the enquiry that you have submitted to us.

5. Disclosures to third parties

We reserve the right to disclose your personal data to third parties:

- if we are under any legal or regulatory duty to do so e.g. reporting safety breaches to the CAA; and/or
- to protect our rights, property or the safety of us, our personnel, users, visitors or others.

6. How we protect your personal data

We have access to shared systems and data; all access to personal data is managed through individual access permissions, controlled by the administrators of the systems, which means that individuals only have access to personal data when it is appropriate for them to do so (this is known as the principle of least privilege). Where an individual is unable to access personal data that they believe they have the right to, for their role, the requirement for their access to personal data is checked with the administrator.

Your personal data is held on secure servers in the UK and we ensure that there are appropriate technical controls in place to protect your personal data. For example, our network is protected. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data when you transmit it to our site.

7. Data retention

When you supply personal data to us to handle your membership, bookings and enquiries, we will retain it in line with our data retention policy. Personal data is retained for the purpose and the length of time necessary for which it was collected i.e. to manage the membership accounts. We may also be under a legal obligation to retain personal data for a specific period and compliance with our legal obligation may limit the right of an individual to have their personal data erased. Where you exercise your rights under data protection law (e.g. the right to have your personal data erased) and this conflicts with any requirement or need for us to retain personal data you will be advised that this is the case and we will give you the timeframe within which we expect to comply with your right.

8. Your Rights in relation to your personal data

You have the right to be informed about what personal data is collected and how that is used; this information is contained in this privacy notice in the section 'What personal data do we collect'.

You have the right to ask us to erase all the personal data that we hold about you, and if it is no longer necessary for the purpose for which you provided it to us (e.g. membership of the club / enquiry) and it is lawful for us to do so, we will erase your personal data and provide you with the outcome of that process.

You have the right to object to processing of your personal data, to stop us processing your personal data or restrict processing of your personal data, and if it's no longer necessary for the purpose for which you provided it to us (e.g. membership of the club or enquiry or registering you for an event) we will do so. Please contact us if you have any concerns.

You have a right to ask for a copy of the personal data we hold about you, although if the effort to provide such personal data is disproportionate (because of manifestly unfounded or excessive requests) then we may charge for processing these requests.

You have the right to have your personal data rectified, where it is shown to be inaccurate or incomplete; if there are any discrepancies in the personal data we use about you, please let us know and we will correct it.

You have the right to seek portability of your personal data in certain circumstances where we are relying on the lawful bases consent or performance of a contract to process your personal data.

If you want to access your personal data, please send a description of the personal data you want to see to info@freedomaviation.co.uk write to the Director Freedom Aviation Ltd, c/o The Control Tower, Cotswold Airport, Kemble, Cirencester, Gloucestershire, GL7 6BA. . We may request proof of identity to ensure that we only provide the personal data to the right person.

If you have any questions or wish to exercise any of your rights please contact info@freedomaviation.co.uk, and for further information see the [Information Commissioner's guidance here \(link is external\)](#).

You have the right to lodge a complaint with the Information Commissioner's Office.

9. How to stop hearing from us

If you decide that the information we provide to you is no longer relevant or interesting to you and you do not wish to hear from us any more, it would be useful for us to understand the reasons; you may change your contact preferences at any time by emailing us at info@freedomaviation.co.uk or calling us on 07973 322 698 or writing to us at Freedom Aviation Ltd, c/o The Control Tower, Cotswold Airport, Kemble, Cirencester, Gloucestershire, GL7 6BA.

10. Our Copyright statement

All material either on this website or provided in hard copy is owned by or licensed to Freedom Aviation Ltd and is protected by registered and/ or unregistered trademark rights, copyright, or other proprietary rights and laws.

Unless indicated as Crown-owned material or otherwise, the material featured on this website or provided in hard copy may be reproduced free of charge in any format or medium, provided that it is reproduced accurately and not used in a misleading context. The material must be acknowledged as Freedom Aviation copyright and the title of the document/publication specified.

Any enquiries regarding the material on this website should be addressed by email to info@freedomaviation.co.uk or by letter to Freedom Aviation Ltd, c/o The Control Tower, Cotswold Airport, Kemble, Cirencester, Gloucestershire, GL7 6BA

11. Changes to this privacy notice

If we decide to change our Privacy Notice, we shall post changes on this webpage and update the relevant sections in our publications where we display how we use your personal data so that you are always aware of how Freedom Aviation use your personal data. If we make significant changes to our Privacy Notice, we will use reasonable efforts to contact you to notify you of such changes.

This page was last updated on 27 May 2018