**Privacy & Data Policy Alderney Flying Training Limited (AFTL)**

**Overview**

Maintaining the security of your data is a priority at AFTL and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. AFTL is also dedicated to being transparent about what data we collect about you and how we use it.

This policy, which applies to both shareholder members and passengers, provides you with information about:

* How we use your data
* What personal data we collect
* How we protect your data
* Your legal rights relating to your personal data
* Our legitimate interests.

**How we use your data**

**General:**

AFTL (and its directors) uses your data:

* To manage and maintain shareholder or pilot records
* To verify your identity
* To contact you about our events/flights which we think may interest you
* For the purpose of Customs or Border Control clearance
* Where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

**Marketing:**

AFTL does NOT use your personal data for marketing purposes.

We will NEVER sell or rent your data to other organisations for marketing purposes.

**Sharing data with third parties:**

AFTL will not disclose your personal data to any third party, except as set out below.

We may share your data with:

* States bodies, regulators, law enforcement agencies, courts, tribunals and insurers where we are required to do so to comply with our legal obligations
* to exercise our legal right (for example in court cases)
* with our online booking and pilot record system
* pilot licence and experience details with AFTL’s aircraft insurers
* for the prevention, detection and investigation of crime or the prosecution of offenders
* for the protection of our pilots and shareholders.

**How long we keep data:**

We will not retain data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however we would not normally keep data for more than 7 years.

**What personal data we collect**

AFTL may collect the following information about you:

* your name, age/date of birth, gender & place of birth
* your contact details, including postal address, telephone and email address
* copies of your passport photo page for proof of identification
* for pilots, we keep your licence & medical details and expiry dates
* when you sell your shares, your bank details
* copies of pilot’s licenses and medical certificates
* copies of any correspondence between us.

**How we protect your data**

AFTL is committed to keeping your personal data safe and secure. We do this by:

* encrypting data where appropriate
* ensuring data is stored securely and is accessible only to those whose position requires it.

**Your legal rights**

You have the following legal rights:

* the right to ask what personal data we hold about you
* the right to ask us to update and correct any out-of-date or incorrect data
* the right to opt out of any non-essential communication we may send you
* the right to ask us to delete your personal data.

**Our legitimate interests**

The normal legal basis for processing your data is that it is necessary for the legitimate business interests of AFTL, including:

* Sending communications which are relevant to the shareholders
* Complying with our legal and regulatory obligations
* Preventing, detecting and investigating all forms of crime and prosecuting offenders
* Protecting shareholders, passengers, employees and other individuals and maintaining their safety, health and welfare
* Handling shareholder (or potential shareholder) contacts, queries, complaints or disputes
* Fulfilling our duties to our shareholders, directors, officers and other stakeholders.

**Contact us**

If you have any concerns about how AFTL uses your personal data, or you wish to exercise any of

your rights, then please contact the directors.

*Alderney Flying Training Limited 31st January 2023*