

Privacy Policy of Dublin Gliding Club CLG (*Last updated: 31 July 2018*).

Privacy Summary

Dublin Gliding Club CLG (hereinafter referred to as “DGC”, “We”, “Us”, “Club” or “The Company”) is committed to protecting your personal information by processing it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

The privacy notice below explains what information we gather about you, what we use that information for and to whom we give the information. It also sets out your rights and who you can contact for more information or queries.

Information about you which we process

We may collect or obtain information about you that you provide to us. This information about you may include your name, address, age, gender, date of birth and contact information. It may also include so called ‘sensitive’ or ‘special categories’ of personal data, such as information pertaining to your health status. For a more detailed description of the information about you that we may process, please see paragraph 3 below.

How we use information about you

We collect and process information about you to enable us to maintain accurate and complete Club records and in order to meet our legal or regulatory obligations. For a more detailed description of how we use information about you, please see paragraph 5 below.

Sharing and transferring your information

We may disclose information about you to third parties such as the Irish Gliding and Soaring Association (hereafter referred to as “the IGSA”). For more information please see paragraph 7 below.

Your rights

Under data protection laws you have a number of rights, including the right to: 1) request copies of your data, 2) request rectification of your data, 3) request erasure of your data, 4) object to us processing your data, and 5) request us to restrict the processing. For more information about your privacy rights please see paragraph 11 below.

Contact points

If you have any questions or comments about privacy issues or wish to exercise any of the rights set out above please write to Chief Privacy and Confidentiality Officer, Dublin Gliding Club CLG, Gowran Grange Airfield, Punchestown, Naas, Co Kildare.

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PRIVACY NOTICE

In this notice:

“Data Protection Legislation” means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection.

1. Who this privacy notice applies to and what it covers
 - 1.1. This privacy notice applies to Dublin Gliding Club CLG
 - 1.2. We are committed to protecting your personal data and processing your information in an open and transparent manner.
 - 1.3. This privacy notice sets out how we will collect, process, store and protect information about you when:
 - 1.3.1. providing services to you;
 - 1.3.2. you use “our Website”; or
 - 1.3.3. performing any other activities that form part of the operation of our Club.
 - 1.4. When we refer to “our Website” or “this Website” in this policy we mean the specific webpages of dublinglidingclub.ie
 - 1.5. In this privacy notice, your information is sometimes called “personal data”. We may also sometimes collectively refer to processing, collecting, protecting and storing your personal data as “processing” such personal data.
2. About other areas of dublinglidingclub.ie
 - 2.1. Please note that the other websites contained within dublinglidingclub.ie are provided by other entities (e.g. YouTube) are not provided by us. Such website links, to this Website,

are not governed by this privacy notice. We encourage visitors to review the privacy notices on each of these other website links before disclosing any personal data.

3. What information we collect

- 3.1. We may collect, record and use information about you in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this notice.
- 3.2. In the course of providing services to you and performing due diligence checks in connection with our services (or communicating with you regarding possible services we might provide), we may collect or obtain personal data about you. We may also collect personal data from you when you use this Website.
- 3.3. We may collect or obtain such data because you give it to us (for example in an enquiry form on our Website that you use to enquire about our Club or by telephone enquiry to us or from a complaint that you make to us), because other people give that data to us (for example a third party who purchases a Temporary Membership of the Club on your behalf) or because it is publicly available. The legal grounds for processing your data are set out in paragraph 6 below.
- 3.4. We may also collect or obtain personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience when you use this Website and ensure that it is functioning effectively, we (or our service providers) may use cookies (small text files stored on a user's computer) and Web beacons which may collect personal data. Additional information on how we use cookies and other tracking technologies and how you can control these can be found in our cookie notice on our Website.
- 3.5. The personal data that we may collect or obtain may include:
 - 3.5.1. your name, gender, age and date of birth;
 - 3.5.2. your contact information, such as your address and contact details (including your email and mobile telephone number);
 - 3.5.3. country of residence;
 - 3.5.4. family circumstances (for example, your marital status and dependents);
 - 3.5.5. your IP address, your browser type and language, your access times;
 - 3.5.6. details of how you use the Club's resources (e.g. flights in Club gliders or in a glider owned by you);
 - 3.5.7. details of your bank account IBAN and BIC;
 - 3.5.8. details of your health status as it relates to your entitlement to participate in flying activities.

- 3.6. The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data. The legal grounds for processing special categories of personal data are set out in paragraph 6.2 below.
- 3.7. If you fail to provide us with this information, or you object to us processing such information (see paragraph 11 below) the consequences are that we may be prevented from allowing you participate in Club activities including but not necessarily limited to, flying activities.
4. Information provided by or about third parties
 - 4.1. Where we are provided with personal data about you by a third party, we take steps to ensure that the Club member or other third party has complied with the data protection laws and regulations relevant to that information; this may include, for example, that the third party has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy notice.
 - 4.2. If any information which you provide to us relates to any third party (such as a spouse, people who depend on you financially, or a joint account holder or beneficiary), by providing us with such personal data you confirm that you have obtained any necessary permissions from such persons to the reasonable use of their information in accordance with the above provisions, or are otherwise permitted to give us this information.
5. How we use information about you
 - 5.1. We collect and process information about you to enable us to maintain accurate and complete Club records and in order to meet our legal or regulatory obligations.
 - 5.2. We will use your personal data to provide you with services relating to the activities of DGC. As part of this, we may use your personal data in the course of correspondence relating to the services. Such correspondence may be with you, other third parties or competent authorities.
 - 5.3. Use of personal data for other activities that form part of the operation of our Club
 - 5.4. We may also use your personal data for the purposes of, or in connection with:
 - 5.4.1. applicable legal or regulatory requirements;
 - 5.4.2. requests and communications from competent authorities;
 - 5.4.3. administrative purposes;
 - 5.4.4. financial accounting, invoicing and risk analysis purposes;
 - 5.4.5. member and prospect relationship purposes, which may involve: (i) sending you insights, opinions, updates, reports on topical issues or details of our membership services that we think might be of interest to you; (ii) contacting you to receive feedback on membership services; and (iii) contacting you to invite you to Club events, training days etc.;

- 5.4.6. Club development purposes (for example testimonials from a Temporary Member may be used as part of our Club development materials with that Temporary Member's permission);
 - 5.4.7. services we receive from our professional advisors, such as lawyers, accountants and consultants; or
 - 5.4.8. protecting our rights and those of our members.
- 5.5. Use of personal data collected via our Website
- 5.5.1. In addition to the purposes connected to the operation of our Club above, we may also use your personal data collected via our Website:
 - 5.5.1.1. to manage and improve our Website;
 - 5.5.1.2. to tailor the content of our Website to provide you with a more personalised experience and draw your attention to information about our Club's activities that may be of interest to you; or
 - 5.5.1.3. to manage and respond to any request you submit through our Website.
- 5.6. The legal grounds we use for processing personal data
- 5.6.1. We are required by law to set out in this privacy notice the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:
 - 5.6.1.1. you have explicitly agreed to us processing your information for a specific reason;
 - 5.6.1.2. the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;
 - 5.6.1.3. the processing is necessary for compliance with a legal obligation we have such as keeping records of flying activities or providing information to a public body or law enforcement agency; or
 - 5.6.1.4. the processing is necessary for the purposes of a legitimate interest pursued by us, which might be: (a) to provide Club services to you and other third parties and ensure that our engagements are well-managed; (b) to maintain the safety of our Club's operations; (c) to protect our Club's interests; (d) to ensure that complaints are investigated; (e) to evaluate, develop or improve our Club's activities; or (f) to keep you informed about relevant Club activities and provide you with information, unless you have indicated at any time that you do not wish us to do so.
 - 5.6.2. To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because of one or more of the following reasons: (i) you have given us your explicit consent to process that data; (ii) we require the data as part of our Club's operations and / or under our

obligations to the IGSA or a relevant Government body; (iii) the processing is necessary for the establishment, exercise or defence of legal claims; (vi) you have made the data manifestly public.

5.6.3. Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

5.7. Sharing your personal data

5.7.1. In connection with one or more of the purposes outlined in the “How we use information about you” section above, we may disclose details about you to the following recipients, or categories of recipients:

5.7.1.1. The IGSA;

5.7.1.2. competent authorities (including courts and authorities regulating us);

5.7.1.3. other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the “How we use information about you” section above.

5.7.2. Our Website may host various blogs, forums, wikis and other social media applications or services that allow you to share content with other users (collectively “Social Media Applications”). Importantly, any personal data that you contribute to these Social Media Applications can be read, collected and used by other users of the application. We have little or no control over these other users and, therefore, we cannot guarantee that any information that you contribute to any Social Media Applications will be processed in accordance with this privacy notice.

5.8. Transferring your personal data outside Ireland

5.8.1. Information about you in our possession will not be intentionally transferred to other countries without your permission except where we are required to do so by EU law or, in the case that we use third party data storage providers, we will ensure that they protect personal data to the same standards as those required in the EEA.

5.9. Protection of your personal data

5.9.1. We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date. These measures include:

5.9.1.1. education and training to relevant Club officers to ensure they are aware of our data protection obligations when processing personal data;

5.9.1.2. administrative and technical controls to restrict access to personal data to a ‘need to know’ basis;

5.9.1.3. technological security measures, including fire walls and anti-virus software; and

- 5.9.1.4. physical security measures relating to access of our premises.
- 5.9.2. Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.
- 5.10. How long we keep your information for
 - 5.10.1. We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal or regulatory obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.
 - 5.10.2. We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant Club activity; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the Club's activities.
 - 5.10.3. With regard to any flight activities that you may participate in as a member of DGC, it is important to note that we have an obligation to permanently hold flight records relating to the individual aircraft in our ownership.
- 5.11. Your rights
 - 5.11.1. You have various rights in relation to your personal data. In particular, you have a right to:
 - 5.11.1.1. obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;
 - 5.11.1.2. be informed about the processing of your personal data;
 - 5.11.1.3. ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
 - 5.11.1.4. ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data;
 - 5.11.1.5. withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
 - 5.11.1.6. receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
 - 5.11.2. object to our processing of your personal data. Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with

Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

5.11.3. We aim to ensure that the information we hold about you is accurate at all times.

To assist us in ensuring that your information is up to date, do let us know if any of your personal details change using the contact details set out in paragraph 5.14.1.

5.12. You may also use the contact details in paragraph 5.14.1 if you wish to make a complaint to us relating to your privacy.

5.13. Sending you Club information

5.13.1. We may use your information from time to time to inform you by letter, telephone, email and other electronic methods, about Club services and activities (including those of third parties) which may be of interest to you.

5.13.2. You may, at any time, request a change to your preferences by following the instructions in communications from us or contacting us in the way described in paragraph 5.14.1 below.

5.14. Right to complain

5.14.1. If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information you can contact us in the following ways:

5.14.1.1. Write to the Chief Privacy and Confidentiality Officer, Dublin Gliding Club
CLG, Gowran Grange Airfield, Punchestown, Naas, Co Kildare

5.14.2. If you have any concerns about our use of your information, you also have the right to make a complaint to the Office of the Data Protection Commissioner (www.dataprotection.ie).

5.15. Changes to this privacy notice

5.15.1. We may modify or amend this privacy notice from time to time.

5.15.2. To let you know when we make changes to this privacy notice, we will amend the revision date at the top of this page. The new modified or amended privacy notice will apply from that revision date. Therefore, we encourage you to periodically review this notice to be informed about how we are protecting your information.