



# **BRITISH MODEL FLYING ASSOCIATION**

## **General Data Protection (GDPR) Guidance for Clubs and Specialist Bodies**



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## **Introduction**

The new General Data Protection Regulation (GDPR) comes in to force on 25<sup>th</sup> May 2018, this document aims to provide you with all the information BMFA Affiliated Clubs and Specialist Bodies require so you are able to take the necessary steps towards GDPR compliance. GDPR is quite a complex regulation and there is a huge amount of information available.

Within this document we have aimed to distil your GDPR responsibilities on to a single page for clarity, see page 2, but also provide some more in depth information so you are better aware of your responsibilities, also provided are some template documents that you can adapt to meet your requirements.

We will be keeping this document under review and it is available to download from the GDPR folder on the Club Support page of the BMFA website at [www.bmfa.org/Clubs/Club-Support](http://www.bmfa.org/Clubs/Club-Support) along with a number of other advice documents and template documents.

Assuming you already have sensible data protection procedures in place the steps to full GDPR compliance are few and not too difficult to introduce and there should be no difficulty in having everything in place for 25<sup>th</sup> May 2018. However model flying clubs are not the primary concern for the Information Commissioners Office and they have indicated that as long as steps are being taken towards compliance they are unlikely to look to take action.

To further assist you in complying with GDPR requirements we are introducing a brand new membership system, coming soon, hopefully around June/July 2018 which will take care of personal data storage and many of the consent requirements. We strongly recommend all clubs and specialist bodies use this to administer your club information.

If you have any questions or would like to provide feedback please contact the BMFA Club Support Officer, Andy Symons. Email:- [andy@bmfa.org](mailto:andy@bmfa.org)

## 1 Page to GDPR Compliance for your club

### 1 Appoint a “Data Protection Compliance Manager”

- Acts as club contact for any data protection issues
- Can be existing data processor
- Does not need to be registered with the ICO
- Ensure DPO is aware of reporting procedures in the event of a data breach.

### 2 Conduct a Data Audit

- What data do you collect?
- Is the data necessary?
- How is the data stored?
- Who has access to the data?
- Who do you share the data with?
- What security measures are in place to protect data?
- See sample Data Audit sheet (Appendix 3)

### 3 Ensure any stored data is secured with limited access

- Password protect any electronic data
- Ensure PC's storing data are password protected, patched with the latest software and have up to date anti-virus protection.
- Restrict access to the minimum number of processors
- Use the new BMFA Membership portal, (coming soon)
- Ensure hard copies of data are stored securely

### 4 Introduce a Club Privacy Notice

- See BMFA Club Template notice (Appendix 2)
- Ensure Privacy Notice is on your website

### 5 Communicate Privacy Notice to all members and new members when joining.

- If using electronic communications to members gather consent from all existing members and new members when they join. This requires a positive action from the individual. Please note that consent is not required for what can be considered as “club management” communications. AGM notices for example.

### Please Note

As not-for-profit organisations that only process data to maintain membership you are exempt from registering with the Information Commissioners Office (ICO) according to the ICO this exemption is being carried forward under GDPR.

## **What is GDPR**

The EU's General Data Protection Regulation (GDPR) is the culmination of four years of efforts to update data protection for the 21st century, in which people regularly grant permissions to use their personal information for a variety of reasons in exchange for 'free' services.

In the UK, GDPR will replace the Data Protection Act 1998, which was brought into law as a way to implement the 1995 EU Data Protection Directive. GDPR seeks to give people more control over how organisations use their data, and introduced hefty penalties for organisations that fail to comply with the rules, and for those that suffer data breaches. It also ensures data protection law is almost identical across the EU.

GDPR Imposes many new obligations on organisations that collect, handle and analyse personal data.

### Six key principles

- Transparency, fairness and lawful use of personal data.
- Limit to specific legitimate purposes.
- Minimising data collection for intended purpose.
- Ensuring accuracy of data. Right to be rectified or erased.
- Limiting storage of data - to be kept for as long is necessary to achieve purpose.
- Ensuring security, integrity and confidentiality.

## **What about Brexit?**

the UK is leaving the EU – but because the UK government only triggered Article 50 in March 2017, which set in motion the act of leaving the EU within a two-year timeframe (though it could take longer), this means GDPR will take effect before the legal consequences of the Brexit vote, meaning the UK must still comply.

A new Data Protection Bill, put forward by the UK government in August 2017, essentially replicates the requirements of GDPR into UK legislation, meaning those compliant with GDPR should be compliant with the new UK data protection law.

## **When will the GDPR apply?**

The GDPR will apply in all EU member states from 25 May 2018. Because GDPR is a regulation, not a directive, the UK does not need to draw up new legislation - instead, it will apply automatically. While it came into force on 24 May 2016, after all parts of the EU agreed to the final text, businesses and organisations have until 25 May 2018 until the law actually applies to them.

## Who does the GDPR apply to?

'Controllers' and 'processors' of data need to abide by the GDPR. A data controller states how and why personal data is processed, while a processor is the party doing the actual processing of the data. So the controller could be any organisation, from a profit-seeking company to a charity or government or a **model flying club**. A processor could be an IT firm doing the actual data processing or in your case the individuals in your club who accesses and uses the data.

It's the controller's responsibility to ensure their processors abide by data protection law and processors must themselves abide by rules to maintain records of their processing activities. If processors are involved in a data breach, they are far more liable under GDPR than they were under the Data Protection Act.

## What information does the GDPR apply to?

Any data, whether stored electronically or as hard copies, that relates to an identified or identifiable person e.g.

- Application Forms
- Home addresses
- Contact Details
- Membership databases
- IP addresses
- Health and medical details
- Feedback forms
- CCTV footage
- An online identifier, user names etc.

## **12 Steps to GDPR Compliance**

The Information Commissioners Office (ICO) have identified 12 steps to GDPR compliance

These 12 steps are

1. **Awareness** :- Make sure that decision makers and key people in your club are aware that the law is changing to the GDPR.
2. **Information you hold** :- You should document what personal data you hold, where it came from and who you share it with. Consider conducting a “data audit” See appendix 3 for sample data audit sheet.
3. **Communicating privacy information** :- Review or introduce a club privacy policy/notice.
  - When you collect personal data you currently have to give people certain information, such as your identity and how you intend to use their information. This is usually done through a privacy notice.
  - Under the GDPR there are some additional things you will have to tell people. For example,
    - you will need to explain your lawful basis for processing the data,
    - your data retention periods
    - what the individual’s rights are including the right to complain to the ICO if they think there is a problem with the way you are handling their data.
  - The GDPR requires the information to be provided in concise, easy to understand and clear language.
  - See Appendix 2 for a Sample Club Privacy Notice.
4. **Individuals’ rights** :- Check your procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.

The GDPR includes the following rights for individuals:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

5. **Subject access requests:**- Update your procedures and plan how you will handle requests to take account of the new rules:
- In most cases you will not be able to charge for complying with a request.
  - You will have a month to comply, rather than the current 40 days.
  - You can refuse or charge for requests that are manifestly unfounded or excessive.
  - If you refuse a request, you must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest, within one month.

For further details on Subject access requests see

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/subject-access-request/>

6. **Lawful basis for processing personal data:**- identify the lawful basis for your processing activity in the GDPR, document it and update your privacy policy/notice to explain it.

There are 6 lawful bases available which are, Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate Interests. As a model flying club your primary lawful basis will most likely be

- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

However if you use electronic communications you also should seek consent

- **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose, especially electronic communications.

7. **Consent:**- Review how you seek, record and manage consent and whether you need to make any changes. GDPR is clear that an indication of consent must be unambiguous and involve a clear affirmative action.
8. **Children:**- You need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity. The GDPR sets the age when a child can give their own consent to this processing at 16 (although this may be lowered to a minimum of 13 in the UK).
9. **Data breaches:**- Make sure you have the right procedures in place to detect, report and investigate a personal data breach. GDPR introduces a duty on all organisations to report certain types of data breach to the ICO. You only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals

10. **Data Protection by Design and Data Protection Impact Assessments:-**  
GDPR makes privacy by design an express legal requirement, the new BMFA membership system which we strongly advise all clubs to use meets this requirement. Data Protection Impact Assessments (DPIAs) while mandatory in some circumstances will not be mandatory for the processing a model flying club conducts
11. **Data Protection Officers:-** You should designate someone to take responsibility for data protection compliance however you are not formally required to designate a Data Protection Officer.
12. **International:-** This is only relevant if your club operates in more than one EU members state which is highly unlikely, if you believe this may affect you please contact us.

See <https://ico.org.uk/media/for-organisations/documents/1624219/preparing-for-the-gdpr-12-steps.pdf>

# Preparing for the General Data Protection Regulation (GDPR)

## 12 steps to take now



1

### Awareness

You should make sure that decision makers and key people in your organisation are aware that the law is changing to the GDPR. They need to appreciate the impact this is likely to have.

2

### Information you hold

You should document what personal data you hold, where it came from and who you share it with. You may need to organise an information audit.

3

### Communicating privacy information

You should review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.

4

### Individuals' rights

You should check your procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.

5

### Subject access requests

You should update your procedures and plan how you will handle requests within the new timescales and provide any additional information.

6

### Lawful basis for processing personal data

You should identify the lawful basis for your processing activity in the GDPR, document it and update your privacy notice to explain it.

7

### Consent

You should review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard.

8

### Children

You should start thinking now about whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity.

9

### Data breaches

You should make sure you have the right procedures in place to detect, report and investigate a personal data breach.

10

### Data Protection by Design and Data Protection Impact Assessments

You should familiarise yourself now with the ICO's code of practice on Privacy Impact Assessments as well as the latest guidance from the Article 29 Working Party, and work out how and when to implement them in your organisation.

11

### Data Protection Officers

You should designate someone to take responsibility for data protection compliance and assess where this role will sit within your organisation's structure and governance arrangements. You should consider whether you are required to formally designate a Data Protection Officer.

12

### International

If your organisation operates in more than one EU member state (ie you carry out cross-border processing), you should determine your lead data protection supervisory authority. Article 29 Working Party guidelines will help you do this.

The 12 steps form what can be considered as the 4 pillars to GDPR compliance



As a Club, you must ensure the personal data you hold about your members is:

- truly secure
- viewed only by those who really need to view it
- limited to what is needed
- accurate
- up to date
- only kept for only as long as it is needed
- deleted / destroyed after a period of time
- available to be seen by its owner on request
- not shared with 3<sup>rd</sup> Parties unnecessarily
- easily amended if incorrect

The Club should ensure that:

- the committee is aware that GDPR legislation applies to the Club
- the club website informs people of how their data will be used
- all officials, and members understand how to handle personal data
- Club officials have given permission for their names and contact details to be made publicly available
- there is a process to follow if any Personal Data is lost or stolen
- changes within the Club that affect the use of Personal Data are communicated
- members understand that broadcast emails can present a security risk
- Personal Data will only be used for Club purposes
- failure to comply with the GDPR legislation can mean substantial fines as well as reputational damage
- if a breach occurs, you must notify the Information Commissioner's Office (ICO) within 72 hours.
- if your club fails to follow these regulations, you may be subjected to GDPR fines greater than €20 million or four percent of your club's previous year's revenue.

## Cyber Security – Protect your device, protect your data!

One of the most common causes of data loss is weak “cyber security” however there are some simple steps you can take to protect yourself and your data.

- Install the latest software and app updates as soon as possible after they become available. Turn on automatic updates.
- Do not use old un-supported operating systems (Windows XP, Vista etc)
- Keep Anti-Virus and malware software updated
- Use a firewall to secure your internet connection
- Always use strong passwords
  - Use three random words to create a strong password
  - Use a strong, separate password for your email
  - Never use any of the following personal details for your password:-
    - Current partner’s name
    - Child’s name
    - Other family members’ name
    - Pet’s name
    - Place of birth
    - Favourite holiday
    - Something related to your favourite sports team
- Beware of fake websites
- Never click on suspicious links or attachments
- Don’t use public Wi-Fi to transfer sensitive information
- Always back up your most important data

Useful links

<https://www.cyberessentials.ncsc.gov.uk/>

<https://www.getsafeonline.org/>

<https://www.cyberaware.gov.uk/>

## **Personal Data Breaches**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices or hard copies containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

At a glance

- The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority, ICO in the UK. You must do this within 72 hours of becoming aware of the breach, where feasible.
- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, you must also inform those individuals without undue delay.
- You should ensure you have robust breach detection, investigation and internal reporting procedures in place. This will facilitate decision-making about whether or not you need to notify the relevant supervisory authority and the affected individuals.
- You must also keep a record of any personal data breaches, regardless of whether you are required to notify.

### **You have had a personal data breach, what now?**

When a personal data breach has occurred, you need to establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it's likely that there will be a risk then you must notify the ICO; if it's unlikely then you don't have to report it. However, if you decide you don't need to report the breach, you need to be able to justify this decision, so you should document it.

To report a data breach call the ICO Data Breach helpline on 0303 1231113

For further information on reporting a data breach see <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

## **Appendix 1 – BMFA Privacy Policy**

At the British Model Flying Association (BMFA), we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who register on our website and/or join the BMFA by whatever means, how we use it, the conditions under which we may disclose it to others, how we keep it secure and your rights in relation to your personal data.

We may change this Policy from time to time so please check the website at [www.bmfa.org/privacy](http://www.bmfa.org/privacy) occasionally to ensure that you're happy with any changes. By registering on our website or by becoming a BMFA member, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [admin@bmfa.org](mailto:admin@bmfa.org) or by writing to Data Protection Officer, British Model Flying Association, Chacksfield House, 31 St Andrews Road, Leicester, LE2 8RE. Alternatively, you can telephone 0116 244 0028.

### **Who Are we?**

The British Model Flying Association is the trading name of the Society of Model Aeronautical Engineers LTD (SMAE), the national governing body (NGB) for the sport of model aircraft flying in the UK and the country's largest air sports association. The registered address is British Model Flying Association, Chacksfield House, 31 St Andrews Road, Leicester, LE2 8RE.

### **How do we collect information about you?**

We obtain information about you when you register on our website or become a member of the BMFA either online, via telephone, through an affiliated club or in person.

### **What type of information is collected about you?**

The personal information we collect might include your name, address, email address, telephone number, gender and IP address. If you join the BMFA, purchase a product or enter a contest/event online, your card/payment information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, any payment information provided by you by other means (telephone/mail) is destroyed immediately after processing.

The legal bases for the processing of your personal data are as follows

- (a) you have given consent by providing the information on our membership website portal.
- (b) to enable the BMFA to fulfil our contractual obligations to provide membership services and insurances including the BMFA news.

## **How is your information used?**

We may use your information to:

- process your membership;
- process orders that you have submitted;
- to carry out our obligations arising from your membership;
- dealing with entries to courses, workshops, contests and events;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about BMFA events and contests, government regulation changes that affect model aircraft flying and other BMFA related news;

## **How long do we retain your information?**

We will hold your personal information on our systems for as long as is necessary to carry out our obligations in relation to your membership, or as long as is set out in any relevant agreement between us. Where an individual persons BMFA membership lapses your information will be securely kept for a period of 5 years for the purposes of maintaining achievement scheme records, after which your information will be deleted.

## **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

If you have selected to join a BMFA affiliated club or BMFA specialist body by using the BMFA online membership service that club/body will have access to your personal data.

**Third Party Service Providers working on our behalf:** We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example send you mailings such as the BMFA News). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the BMFA unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our secure online payment pages, your payments are processed by a third party payment processor, who specialises in the secure online capture and processing of transactions. If you have any questions regarding secure transactions, please contact us.

## **How you can access and update your information?**

The accuracy of your information is important to us. You can check the information we hold is correct on the members dashboard area of our website and update the information if necessary directly through the website, or by email to [admin@bmfa.org](mailto:admin@bmfa.org) or write to us at: British Model Flying Association, Chacksfield House, 31 St Andrews Road, Leicester, LE2 8RE. Alternatively, you can telephone 0116 244 0028.

## **Links to non BMFA websites?**

Our websites may contain links to other websites run by other organisations. This privacy policy applies only to our websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## **What are your rights?**

- (a) the right to access;

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by visiting your members dashboard when logged into our website.

- (b) the right to rectification;

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

- (c) the right to erasure;

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data being no longer necessary in relation to the purposes for which the data was collected or otherwise processed, you are no

longer a BMFA member and wish the data not to be held for our standard 7 year period.

Please note a request for data erasure for a current member would require that member to forfeit membership. The data is required for the BMFA to fulfill its obligations.

- (d) the right to restrict processing;

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- (e) the right to object to processing;

You have the right to object to our processing of your personal data for direct electronic communications purposes. If you make such an objection, we will cease to process your personal data for this purpose. You can set your electronic communications preferences on your members dashboard when logged into our website

- (f) the right to data portability;

To the extent that the legal basis for our processing of your personal data is:

(1) consent; or

(2) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- (g) the right to complain to a supervisory authority;

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioners Office.

<https://ico.org.uk>

- (h) the right to withdraw consent.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us OR by using your members dashboard when logged into our website

British Model Flying Association

Chacksfield House

31 St Andrews Road

Leicester, LE2 8RE

[admin@bmfa.org](mailto:admin@bmfa.org)

Tel 0116 244 0028

## **Appendix 2 – Club Privacy Notice Template**

At the <<Insert name of club>> hereafter referred to as “the club”, we’re committed to protecting and respecting your privacy.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Data Protection Compliance Manager has overall responsibility for data protection compliance in our club. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

This Notice explains when and why we collect personal information about people who join the club by whatever means, how we use it, the conditions under which we may disclose it to others and your rights in relation to your personal data.

We may change this notice from time to time so please check the website at (insert address) or request a copy occasionally to ensure that you’re happy with any changes. By becoming a member of the club, you’re agreeing to be bound by this notice.

Any questions regarding this Policy and our privacy practices should be sent by email to <<insert club email address>> or by writing to <<Insert club official address>>. Alternatively, you can telephone <<insert tel no>>.

### **How do we collect information about you?**

We obtain information about you when you apply to become a member of the club either online with the British Model Flying Association (BMFA), via telephone, or in person.

### **What type of information is collected about you?**

The personal information we collect might include your name, address, email address, telephone number, gender and IP address.

The legal bases for the processing of your personal data is to enable the club to fulfil our contractual obligations and provide membership services.

### **How is your information used?**

We may use your information to:

- process your membership;
- to carry out our obligations arising from your membership;
- seek your views or comments on matters relating to the club and model aircraft flying
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about club events and contests and other club related matters, also information from the BMFA that may be of interest.

### **How long do we retain your information?**

We will hold your personal information on our systems for as long as is necessary to carry out our obligations in relation to your membership, or as long as is set out in any relevant agreement between us. Where an individual persons club membership lapses your information will be securely kept for a period of <<insert period>>, after which your information will be deleted.

### **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

All members of the club must also be members of the BMFA, by joining the club you give consent for your personal data to be shared with the BMFA to enable provision of BMFA membership services. Please see the BMFA privacy policy at

[www.bmfa.org/Privacy-Policy](http://www.bmfa.org/Privacy-Policy)

Please be reassured that we will not release your information to third parties beyond the club unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

### **How you can access and update your information?**

The accuracy of your information is important to us. You can check the information we hold is correct on the members dashboard area of the BMFA website and update the information if necessary directly through the website, or by email to <<insert club email address>> or write to us at: <<Insert club official address>>. Alternatively, you can telephone <<insert tel no>>.

### **What are your rights?**

- (i) the right to access;

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by visiting your members dashboard when logged into our website.

- (j) the right to rectification;

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

- (k) the right to erasure;

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data being no longer necessary in relation to the purposes for which the data was collected or otherwise processed, you are no longer a club member and wish the data not to be held for our standard <<insert period>>.

Please note a request for data erasure for a current member would require that member to forfeit membership. The data is required for the club to fulfill its obligations.

- (l) the right to restrict processing;

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- (m) the right to object to processing;

You have the right to object to our processing of your personal data for direct electronic communications purposes. If you make such an objection, we will cease to process your personal data for this purpose.

- (n) the right to data portability;

To the extent that the legal basis for our processing of your personal data is that the processing is necessary for the performance of a contract to which you are party and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- (o) the right to complain to a supervisory authority;

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioners Office.

*<https://ico.org.uk>*

- (p) the right to withdraw consent.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us OR by using your BMFA members dashboard when logged into their website

### **Contacting Us**

<<Insert Club Name and Data Protection Compliance Manager contact details>>



## **Appendix 4 – Useful Links**

BMFA Privacy Policy

<https://www.bmfa.org/Privacy-Policy>

BMFA Club Support Documents

<https://www.bmfa.org/Clubs/Club-Support>

Information Commissioners Office

<https://ico.org.uk/>

ICO Data Breach Reporting Information

<https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

EU GDPR Website

<https://www.eugdpr.org/>

Cyber Security Links

<https://www.cyberessentials.ncsc.gov.uk/>

<https://www.getsafeonline.org/>

<https://www.cyberaware.gov.uk/>

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