DATA PROTECTION POLICY

Version 2.1
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VATSIM SCANDINAVIA

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1. Definitions

1.1. Summary

VATSIM Scandinavia refers to the organisation at http://vatsim-scandinavia.org/
(“we”, “us” or “our”)
VATSIM Scandinavia constitution can be found on our website.
VATSIM refers to the organisation at https://www.vatsim.net/
Discord refers to Discord Inc. at https://discordapp.com/

2. Introduction

2.1. Purpose of policy

The purpose of this policy is to comply with the law, particularly the EU General Data Protection Regulations (GDPR).

2.2. Types of data

VATSIM Scandinavia collects data from its members and from third parties. All data collection is done with the express consent of the member obtained electronically before being afforded access to our services.

2.3. Data we collect

Whilst using our services we collect data from and about you to facilitate our online training and other systems such as our forums and to provide best user experience. This data includes:

- IP-address and connection information
- Login information
- Training records
- Training requests
- User messages
- User images
- Web services usage data
- Other user provided data

2.4. Data we receive from third parties

To efficiently run our services and to have all the needed data for virtual air traffic controller training and community management, we may need to receive data from third parties. This data includes:

2.4.1. VATSIM CERT

- VATSIM ID (or CID)
- Full name
- E-mail address
- Virtual Air Traffic controller rating
- Virtual Pilot rating
- Registration date
- Country
- VATSIM Region, Division and Subdivision (e. g. vACC or ARTCC)

2.4.2. VATSIM Stats

- Callsign
- Position
- Name
- Timestamp
- Connection duration

2.4.3. Discord

- Discord ID

2.4.4. Moodle

- E-mail address
- Full name

2.4.5. Classmaker

- E-mail address
- Full name

2.4.6. Hotjar

- Website usage and feedback data (e.g. usage heatmaps)

2.4.7. Google Analytics

- Website usage data (e.g. cookies, device type and operating system)

2.5. Data we provide to third parties

To provide better services and to manage our Discord server we may provide data to third parties. We may also share data to VATSIM, or its associated or affiliated organizations where deemed necessary for the execution of their official duties on the VATSIM network. This data includes:

2.5.1. Discord

- VATSIM ID (or CID)
- Full name
- VATSIM membership status
- VATSIM Scandinavia membership status

2.6. Policy statement

VATSIM Scandinavia has an unequivocal commitment to:

- Comply with both the law and good practice
    - Respect individuals' rights including:
        - The right of access
        - The right to be informed
        - The right of rectification
        - The right to data portability
        - The right to object
        - The right to restrict processing
        - The right of erasure
- Be transparent and honest about our data handling and processing to our members.
- Notify the relevant data handling authorities, if appropriate, even if legally not required to do so.

3. Responsibilities

Responsibility for ensuring data protection and compliance with this policy and applicable legislation and standards rests collectively with the VATSIM Scandinavia staff and assistants to the staff.

3.1. Data Protection Officer

The appointed data protection officer is listed on the VATSIM Scandinavia website staff page and can be contacted at dpo@vatsim-scandinavia.org.

3.2. Department heads

Staff members responsible for different departments have the duty to oversee their specific departments personal data collection, processing and storage. All staff members are listed on the VATSIM Scandinavia website and can be contacted by the e-mail addresses listed therein. These departments and their department heads include:

- The Training Department – Training Director (ACCSCA2)
- The Web Services Department – Web Services Director (ACCSCA11)

3.3. Other staff

Other staff members are listed on the VATSIM Scandinavia website and can be contacted by the e-mail addresses listed therein.

3.4. Assistants to the staff

Assistants to the staff are defined in the constitution of VATSIM Scandinavia.

3.5. Enforcement

VATSIM Scandinavia has a zero-tolerance policy towards inappropriate or unauthorized access to or sharing of personal data. Any such conduct will result in revocation of access rights of the said individual until such time the risks to personal data security have been mitigated.

4. Data processing and storage

4.1. Accuracy

As most of our data is received from third parties such as VATSIM we assume this data is accurate. Where it is found not to be, we facilitate the rectification of this, according to section 7 of this policy.

4.2. Updating

A member can request an update to their personal data by contacting the Data Protection Officer or by requesting rectification according to section 7 of this policy.

4.3. Storage

Data is stored in standard filesystems and databases. Access to these systems is controlled and provided only to those who need access for the execution of their duties. VATSIM Scandinavia will do its most to protect all data against unauthorized access.

4.4. Retention periods

VATSIM Scandinavia is bound by the retention periods of VATSIM, as set out in their Data Protection and Handling Policy. Due to technical limitations of VATSIM systems personal data is not automatically deleted and any member wishing erasure can make a Right of Erasure request according to section 8 of this policy.

4.5. Archiving

VATSIM Scandinavia does not archive data to long term storage. All data is maintained within the production environment and backups or deleted in its entirety.

4.6. Automated decision making and profiling

VATSIM Scandinavia may use automated data processing to make decisions based on individuals' personal data for the purposes of virtual air traffic controller training. All automated data processing in done with the express consent of the individual.

5. Transparency

5.1. Commitment

VATSIM Scandinavia is committed to ensuring the security of all personal data and will take all necessary precautions to prevent unauthorized access to personal data. Should we detect personal data to have been accessed without authorization we will inform all affected members and appropriate authorities without delay. VATSIM Scandinavia may transfer data to other affiliated and associated organizations to enhance or extend our services. Where necessary a user consent will be requested before personal data is transferred to third parties.

5.2. Responsibility

All staff and assistants to the staff of VATSIM Scandinavia are always responsible for the data they access and must take all necessary precautions to prevent exposure of personal data to unauthorized individuals. Where possible VATSIM Scandinavia staff and assistants to the staff will use anonymous aggregated or pseudonymised data to lessen the risk of unauthorized data release.

6. Right of Access

6.1. Responsibility

The responsibility of handling Right of Access requests is the responsibility of the Data Protection Officer. Requests are to be complied with within one month of the request being received. If circumstances prevent this from occurring, an extension of a further two months may be instituted by VATSIM Scandinavia, providing that the member making the request is informed of this fact before the expiration of the original one-month deadline.

6.2. Procedure for making request

Right of Access requests must be made to the Data Protection Officer via email to dpo@vatsim-scandinavia.org. If any other staff or assistant to the staff receive anything that might be construed to be a Right of Access request, they shall pass this request to the data protection officer without delay.

6.3. Provision for verifying identity

Where the person managing the procedure does not know the individual personally, the individual's identity will be verified before handing over any information.

6.4. Charging

VATSIM Scandinavia will not charge any fee for processing or providing data for requests under the Right of Access.

6.5. Procedure for granting access

After the individual's identity has been verified reliably according to this policy may said individual be provided access to their personal data. Any personal data about other individuals will be redacted.

7. Right of Rectification

7.1. Responsibility

The responsibility of handling Right of Rectification requests is the responsibility of the Data Protection Officer. Requests are to be complied with within one month of the request being received. If circumstances prevent this from occurring, an extension of a further two months may be instituted by VATSIM Scandinavia, providing that the member making the request is informed of this fact before the expiration of the original one-month deadline.

7.2. Procedure for making request

Right of Rectification requests must be made to the Data Protection Officer via email to dpo@vatsim-scandinavia.org. If any other staff or assistant to the staff receive anything that might be construed to be a Right of Rectification request, they shall pass this request to the data protection officer without delay.

7.3. Provision for verifying identity

Where the person managing the procedure does not know the individual personally, the individual's identity will be verified before rectification of any data.

7.4. Charging

VATSIM Scandinavia will not charge any fee for processing data for requests under the Right of Rectification.

7.5. Procedure for rectification

After the individual's identity has been verified reliably according to this policy may the personal data of the individual be rectified.

8. Right of Erasure

8.1. Responsibility

The responsibility of handling Right of Erasure requests is the responsibility of the Data Protection Officer. Requests are to be complied with within one month of the request being received. If circumstances prevent this from occurring, an extension of a further two months may be instituted by VATSIM Scandinavia, providing that the member making the request is informed of this fact before the expiration of the original one-month deadline.

8.2. Procedure for making request

Right of Erasure requests must be made to the Data Protection Officer via email to dpo@vatsim-scandinavia.org. If any other staff or assistant to the staff receive anything that might be construed to be a Right of Erasure request, they shall pass this request to the data protection officer without delay.

8.3. Provision for verifying identity

Where the person managing the procedure does not know the individual personally, the individual's identity will be verified before erasure of any data.

8.4. Charging

VATSIM Scandinavia will not charge any fee for processing data for requests under the Right of Erasure.

8.5. Procedure for erasure

After the individual's identity has been verified reliably according to this policy may said individual's personal data be erased. VATSIM Scandinavia reserves the right to retain any data if it believes it is in the legitimate interests to do so, or that is required to establish, exercise, or defend any legal claims.

9. Security

9.1. Scope

This section applies to all systems under the control of VATSIM Scandinavia and to all systems used to process personal data of its members by VATSIM Scandinavia or its staff or assistants to the staff.

9.2. Security measures

VATSIM Scandinavia employs standard methods of encryption to safeguard personal data and monitors all systems for possible abuse or unauthorized access.

9.3. Backups

To ensure continued access to services VATSIM Scandinavia may backup personal data within relevant systems to maintain data integrity, security and continued service.

9.4. Specific risks

The main specific risks to the security of personal data include:

- Phishing attacks to gain system access
- Access by means of trojan or keylogging programmes on members systems
- Misuse by upset members who have been granted access to personal data

Mitigation of the first two risks is by encouraging members who have a higher level of access to ensure they adhere to good security practices on their personal systems. The last risk is mitigated by access logging and reverting changes made by those who misuse access.

10. Lawful Basis

10.1. Underlying principles

VATSIM Scandinavia asserts it has a legitimate interest in data collection, processing and storage as outlined in this policy. All personal data collected by us is strictly for use in the development or execution of our services such as virtual air traffic controller training. VATSIM Scandinavia regularly audits its data collection measures and the scope of data collection to minimise collected personal data.

10.2. Members under the age of 16

VATSIM Scandinavia relies on VATSIM and VATSIM'S Safeguarding Minors Policy. to ensure parental consent is collected from users unable to give their consent according to the EU General Data Protection Regulations (GDPR).

10.3. Opting out

Notwithstanding VATSIM Scandinavia claim of legitimate interest, members may request VATSIM Scandinavia to cease processing of a members' personal data. These two rights are known as the right to Object and the Right to Restrict Processing.

Members must be aware that if they choose to exercise either of these rights VATSIM Scandinavia is obliged to lock their accounts in order to comply with their request.

10.4. Timing of opting out

While a notification of an objection to VATSIM Scandinavia's claim of legitimate interest, or a request to suspend processing may be made at any time, such claims may not be made retrospectively.

11. Changes to this policy

11.1. Responsibility

The responsibility for the review of this policy rests with the Data Protection Officer as defined in the section 3.1 of this policy.

11.2. Procedure

At a minimum this review shall include:

- Consultation of the Board of VATSIM Scandinavia
- Consultation of the Web Services Department of VATSIM Scandinavia
- Consultation of the Training Department of VATSIM Scandinavia
- Review of any data breaches during the period of validity of the current policy
- Review of all audits of data access during the period of validity of the current policy

11.3. Timing

For the required review to be completed by the required date (24 May 2021) such consultation shall commence no later than 24 Nov 2020.