

**TSA Consulting Ltd** Phoenix House Phoenix Way Cirencester Gloucestershire GL7 1QG

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# **GENERAL DATA PROTECTION REGULATION (GDPR) – COMPANY POLICY**

#### Introduction

New regulations for the holding and sharing of personal data came into effect in the UK on 25 May 2018.

This document sets out how TSA Consulting Ltd will comply with the regulations to protect your data and to set out under what circumstances, and only with your consent, it would share your data with a  $3^{rd}$  party.

## Personal Data

Your personal data is any data which by itself, or with other data, can be used to identify you. Some could be considered sensitive data (eg Pilots Licence, DA), whilst other elements may be considered non-sensitive data (eg data that you may have already chosen to put into the Public domain via your own website eg name, aircraft, contact e-mail or phone number).

## Storing your data

Personal data supplied to TSA Consulting Ltd will generally be provided electronically via e-mail or via the online submissions made on <u>www.tsaconsulting.co.uk</u> or <u>www.fddtraining.co.uk</u>. Data received via individual e-mail addresses will only be received by the intended addressee. Data received via the <u>info@tsaconsulting.co.uk</u> e-mail address or via website submissions from <u>www.tsaconsulting.co.uk</u> or <u>www.fddtraining.co.uk</u> will be received by the Flying Display Directors, training staff, our webmaster and select members of our Flying Control Committee who undertake our pre-event document scrutiny.

We will take all reasonable steps to keep your personal data secure. All received data will either be stored electronically on password protected computers, secure password-protected back-up storage devices or, where a hard-copy is made, filed in a secure cabinet when not being used.

#### How, where and when we would use and share your data

We will only use the personal data that you provide to us, sensitive or non-sensitive, as part of a process to secure you a booking at one or more of our events, or to subsequently plan and promote any confirmed participation. Consequently, your data would only ever be shared with an Event Organiser (EO), its Managing Agents, it's Media Partners, the Civil Aviation Authority (CAA) and the basing airport for a particular event. In all cases, we will seek to obtain the 3<sup>rd</sup> party's own GDPR policy to ensure it meets our own standard as a minimum. Furthermore, and critically, only the minimum relevant data would be shared with the individual 3<sup>rd</sup> party.

Information submitted via <u>www.fddtraining.co.uk</u> will be shared with the MAA and CAA.

We would never pass on any of your personal data to an unknown or unrelated 3<sup>rd</sup> party or to any marketing or selling organisation.

Sensitive personal data would be retained as described above for the duration of the season and would then be deleted electronically or shredded, unless regulatory requirements or compliance



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requires it to be retained for a longer period (invoicing) in which case it will continue to be stored securely as described above. Non-sensitive personal data would be retained for ongoing use whilst both parties continue to work in the air display industry and continue to potentially have shared business interests

## Acceptance

To confirm acceptance of these arrangements, including your consent for us to share relevant elements of your data with necessary 3<sup>rd</sup> parties only, a check box has been added to our online forms to allow you to confirm your consent. For any personal data supplied by other means you will be asked to confirm your consent for us to retain and use your data as set out above.

## Individual Rights

You retain the following rights throughout:

- 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

David Walton Director 01 October 2019