



Data Protection Policy

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Definitions

VATOCE	means VATOCE the Oceania Region of VATSIM.
GDPR	means the General Data Protection Regulation.
Responsible Person	means any member of VATOCE Regional Staff.
Register of Systems	means a register of all systems or contexts in which personal data is processed by VATOCE.

1. Data protection principles

VATOCE is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public

interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by VATOCE.
- b. The Responsible Person shall take responsibility for VATOCE’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, VATOCE shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to VATOCE shall be dealt with in a timely manner.

4. VATOCE3 Regional Membership Manager

- a. The Regional Membership Manager is listed on the Staff Page <https://www.vatoce.net/about-us-2/> and is ultimately subordinate to the Regional Director.

5. Data minimisation

VATOCE shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Data that we may collect is as follows;

- Individual Training Records
- Requests for Support
- Communications with other Members
- Any Data you submit to our systems through forms or actions taken while using any of our services.

6. Accuracy

- a. VATOCE shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Retention / Erasure

- a. VATOCE is bound by the retention periods of VATSIM, set out in their Data Protection and Handling Policy. Requests for erasure can be processed by VATOCE but may need escalating to VATSIM , VATPAC or VATNZ in order to fulfil the entirety of the request.

8. Archiving

- a. VATOCE does not archive any data to other servers at this point in time for long term storage.

9. Responsibility of Requesting Erasure/Granting Access

The appointed Regional Membership Manager or in their absence the Regional Director is responsible for handling requests under the Right of Erasure/Access provisions.

Requests will be made via region@vatoce.net

END OF POLICY