

## RAVENAIR DATA RETENTION AND SHARING POLICY IAW GDPR

### 1. Regulation

The General Data Protection Regulation (EU) 2016/679 (GDPR) sets out the protection of persons with regard to the processing of personal data. The regulation protects the rights and freedoms of individuals and their right to the protection of their data. The regulation is supplemented by the UK Data Protection Bill, which when enacted, will provide additional requirements, as permitted by the GDPR.

### 2. Scope

The regulation applies to the processing of personal data wholly or partly by automated means and to the processing other than by automated means of personal data which forms part of a filing system, or is intended to form part of a filing system.

### 3. Territory

The regulation applies to the processing of personal data connected with the activities of a controller or processor located within an EU Member State, regardless of whether or not processing takes place within the Union.

### 4. Definitions

The GDPR is contained in Regulation (EU) 2016/679. Definitions are also set out in the regulation at Article 4. Some commonly used definitions are summarised below, using the numbering system from Article 4:

(1) Personal Data – any information relating to an identified or identifiable individual (the 'data subject'). Identifiable refers to identifiers such as name, ID number, location data, online identifier, physical, psychological genetic, mental, cultural, or social identity.

(2) Processing – any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, making available, alignment, combination, restriction, erasure or destruction.

(7) Controller – determines the purposes and the means of the processing of personal data. It is the controller that must be able to show compliance with the principles of GDPR.

(8) Processor – processes the data on behalf of the controller.

(9) Recipient – person or organisation to which the personal data is disclosed, whether a third party or not.

(10) Third Party – a person or organisation, other than the data subject, controller, processor, and persons under the authority of the controller or processor who are authorised to process personal data.

(11) Consent – consent of the data subject must be freely given, specific, informed and unambiguous, through a statement or clear affirmative action, by which s/he signifies agreement to the processing of personal data relating to him/her.

(12) Personal Data Breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

## **5 GDPR Principles**

Article 5 of the regulation sets out the principles of GDPR, which are summarised below: Personal data is to be:

- (a) Processed lawfully, fairly and transparently.
- (b) Collected for specified, explicit, and legitimate purposes, and only processed in a manner compatible with those purposes.
- (c) Adequate, relevant and limited to what is necessary for the purposes for which they are processed.
- (d) Accurate, kept up to date, and that inaccurate data is erased or rectified.
- (e) Only retained (stored) in a form that permits identification of data subjects for as long as is necessary.
- (f) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage.

Ravenair as the controller is responsible for ensuring compliance with the GDPR principles, including a requirement that the processor of the personal data does so in a compliant manner.

## **6. Lawfulness of Processing**

### **6.1 Lawful Basis**

Article 6 of the GDPR sets out the rules that permit lawful processing of personal data, the 'lawful basis', as follows:

- (a) The data subject has given consent to the processing of their personal data for one or more specific purposes.
- (b) Processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract, such as provision of a quote.
- (c) Processing is necessary for compliance with legal obligations to which the controller is subject. The UK government is permitted through the GDPR to introduce more precisely specific requirements and other measures to ensure

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lawful and fair processing. The UK's Data Protection Bill, once enacted, will contain any such provisions.

(d) Processing is necessary in order to protect the vital interests of the data subject or another person. (Vital interest is lifesaving or emergency medical treatment).

(e) Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller. This condition will not apply to Ravenair.

(f) Processing is necessary for the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

See also paras 9 and 10 relating to special categories of personal data and data relating to criminal convictions and offences. See para 30 for the records of processing that must be retained.

### **7. Conditions for Consent**

Where processing is personal data is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of their personal data.

Where the data subject's consent is given in a written declaration that also contains reference to other matters, the request for consent shall be clearly distinguishable from the other matters. The request for consent shall be intelligible, easily accessible, using clear and plain language.

The data subject has the right to withdraw consent at any time, but this does not affect the lawfulness of the processing of personal data before consent is withdrawn.

Withdrawal of consent is to be made as easy as giving consent.

When deciding whether consent is given freely, account needs to be taken whether the provision of a service is conditional on consent to the processing of personal data that is not necessary for the performance of that service/contract.

### **8. Processing of Special Categories of Personal Data**

The processing of special categories of personal data is not permitted, unless one of the specified additional conditions described at para 9.2 applies.

#### **8.1 Special Categories of Personal Data**

The following are the special categories of data:

- (a) Racial or Ethnic Origin.
- (b) Political Opinions.

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- (c) Religious or Philosophical Beliefs.
- (d) Trade Union Membership.
- (e) Genetic Data.
- (f) Biometric Data for Uniquely Identifying a Person.
- (g) Health Data.
- (h) Sex Life or Sexual Health Data.

### **8.2 Additional Conditions for the Processing of Special Categories of Personal Data**

The following additional conditions apply to the processing of special categories of personal data:

- (a) The data subject has given explicit consent, unless there is an overriding prohibition that may not be lifted by the data subject.
- (b) The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or the data subject in the field of employment and social security and social protection law.
- (c) Processing is necessary to protect vital interests of the data subject or another natural person, where the data subject is incapable physically or legally to give consent.
- (d) Processing is carried out in the course of its legitimate activities by a not for profit body with political or religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with the organisation's purposes, and the personal data is not shared outside the organisation.
- (e) Processing relates to personal data that is made public by the data subject.
- (f) Processing relates to the exercise or defence of legal claims.
- (g) Processing is necessary for reasons of substantial public interest.
- (h) Processing is necessary for the purposes of preventative or occupational medicine, medical diagnosis, the provision of health or social care, or treatment or management of health or social care systems and services on the basis of applicable law or pursuant to contract with a health professional. The data must be processed by a professional under the obligation of professional secrecy.
- (i) Processing is necessary for reasons of public interest in the area of public health.
- (j) Processing is necessary for archiving in the public interest, scientific or historical research purposes or statistical purposes.

The UK Data Protection Bill, when enacted, may introduce further conditions and limitations concerning health, genetic and biometric data.

## **9. Processing of Personal Data relating to Criminal Convictions and Offences**

Processing personal data relating to criminal convictions or offences shall be carried out only under the control of official authority or when processing is authorised by law. A register of criminal convictions shall be kept only under the control of official authority.

Authorisation by law to process personal data is an additional condition to the lawful basis established under para 6.

The UK's Data Protection Bill, when enacted, will provide the legal authority for processing personal data relating to criminal convictions and offences. The Bill current states that legal authorisation is given only if the processing meets the conditions of Part 1, 2 or 3 of Schedule 1. Part 3 includes the following conditions relating to criminal convictions:

- (a) The data subject has given consent to the processing.
- (b) The processing is necessary to protect the individual's vital interests, where the data subject is incapable physically and legally of giving consent.
- (c) Processing is carried out in the course of its legitimate activities by a not for profit body with political or religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with the organisation's purposes, and the personal data is not shared outside the organisation without the data subject's consent.
- (d) The processing relates to personal data made public by the data subject.
- (e) The processing is necessary for the purpose of any legal or prospective legal proceedings, of for establishing, exercising or defending legal rights.

## **10. Provision of Information**

The controller shall provide the information set out in this section in a concise, transparent, intelligible and easily accessible form, using clear and plain language, within one month of receipt of the request.

The controller may extend the period by a further 2 months, where necessary, taking into account the complexity and number of requests. The controller will inform the data subject of any extension and the reasons for the extension within one month of receiving the request.

If the controller does not take action on the request, the controller is to inform the data subject within one month of the reason for not taking action, and the possibility of lodging a complaint with the ICO and seeking a judicial remedy.

Information will be provided to the data subject in one of written, electronic or oral form, as requested by the data subject.

No charge may be made for providing information to the data subject under the obligations placed on the controller by the GDPR, unless the requests are manifestly unfounded or excessive.

The controller may make a reasonable charge taking into account the administrative costs of responding to the request, in cases of unfounded or excessive requests, or may refuse to act on the request. However, the controller must be able to justify and demonstrate why the request is excessive or unfounded.

If the controller has reasonable doubts as to the identity of the person making the request, the controller may request additional information necessary to determine the identity of the data subject.

## **11. Information to be provided when Personal Data is collected from the Data Subject**

1. When personal data is collected from a data subject, the controller shall provide to the data subject, at the time of collection, with the following information:

- (a) The identity and contact details of the data controller.
- (b) The purposes of the data processing for which the personal data is intended, as well as the legal basis for the processing.
- (c) The legitimate interests pursued by the controller or the third party when legitimate interest is the legal basis for processing data.
- (d) Recipients or classes of recipients of the data subject's personal data.

2. In addition to the information referred to in para 1, the controller shall provide the data subject with the following information, at the time the personal data is collected:

- (a) The period for which personal data will be stored, or if that is not possible, the criteria used to determine the period.
- (b) The existence of the right to request from the controller access to, rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing, as well as the right to portability.
- (c) Where the lawful basis of processing is consent, the right to withdraw consent at any time, without affecting the lawfulness of data processing based on consent before its withdrawal.
- (d) The right to lodge a complaint with the ICO.
- (e) Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as the data subject is obliged to provide the personal data and of the possible consequence of failure to provide such data.

(f) Consent will be granted by individuals who complete the Ravenair Privacy Statement Form AL1 May 2018. These forms are to be retained by the Ravenair Data Protection Officer.

## **12. Right of Access by the Data subject**

1. The data subject has the right to obtain from the controller confirmation of whether or not personal data about him/her is being processed, and if so, access to the personal data and the following information:

- (a) The purpose of the processing.
- (b) Categories of personal data processed.
- (c) The recipients or categories of recipient to whom personal data has been disclosed or will be disclosed.
- (d) Where possible, the envisaged period for which personal data will be stored, or if not possible, the criteria to determine that period.
- (e) The existence of the right to request from the controller access to, rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing.
- (f) The right to lodge a complaint with the ICO.
- (g) Where personal data is not collected from the data subject, any available information as to its source.

## **13. Right to Rectification**

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data, and the completion of incomplete data.

## **14. Right to Erasure**

The data subject has the right to obtain from the data controller the erasure of personal data concerning the data subject without undue delay when one of the following grounds applies:

- (a) The personal data is no longer necessary in relation to the purpose for which it was processed.
- (b) The data subject withdraws consent where the lawful basis of processing is consent, and where there is no other legal ground for processing.
- (c) The data subject objects to the processing where the legal basis is legitimate interest and there is no overriding legitimate ground for the processing, or the data subject objects to the processing of personal data for marketing.
- (d) Personal data has been processed unlawfully.

(e) The personal data has to be erased for compliance with a legal obligation to which the controller is subject.

Paras (a) to (f) do not apply when processing is necessary for the establishment, exercise or defence of legal claims.

## **15. Right to Restriction of Processing**

The data subject has the right to a restriction of processing where one of the following applies:

(a) The accuracy of the personal data is contested by the data subject, for a period to enable the controller to verify the accuracy of the personal data.

(b) The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead.

(c) The controller no longer needs the personal data for the purposes of processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.

(d) The data subject objects to the processing of the personal data, pending verification of whether the legitimate interests of the controller override those of the data subject.

Where the processing has been restricted under paras (a) to (d) above, the personal data, except for storage only, is to be processed in accordance with the data subject's consent, except for the establishment, exercise or defence of legal claims, or for the protection of the rights of another person, or in the public interest.

The data subject shall be informed prior to the lifting of any restriction of processing.

## **16. Obligation to Notify Rectification, Erasure or Restriction of Processing of Personal Data**

The controller is to communicate any rectification, erasure or restriction of processing of personal data to each recipient to whom personal data has been given, unless, unless this proves impossible or involves disproportionate effort. The controller is to inform the data subject about those recipients if the data subject requests it.

## **17. Right to Personal Data Portability**

The data subject has the right to receive personal data concerning them that they have provided to the controller, in a structured, commonly used and machine readable format, and have the right to transmit the data to another controller. This right applies when:

(a) The legal basis for processing the personal data is consent.

(b) The processing is carried out by automated means.

Where feasible, the data subject is entitled to have their personal data transmitted from one controller directly to another, when permitted to exercise the right of portability.

The right to portability does not prejudice the right to erasure.

The right to portability shall not adversely affect the rights and freedoms of others.

## **18. Right to Object**

(a) The data subject has the right to object at any time, based on grounds relating to their particular situation, to the processing of their personal data, where the legal basis for the processing is legitimate interest. The controller may only continue to process the data if the controller can demonstrate compelling legitimate interest that overrides the interests, rights and freedoms of the data subject, or in the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, the data subject has the right to object at any time, to the processing of personal data concerning them for the purpose of marketing. If the data subject objects in this case, the personal data shall no longer be processed for such purpose.

## **19. Restrictions**

The GDPR permits Member States to restrict the obligations and rights under certain elements of the GDPR, which the UK will achieve through the UK's Data Protection Bill, when this is enacted. The Data Protection Bill is available via the UK government website (.gov).

## **20. Responsibility of the Controller**

Taking into account the varying risk to the rights and freedoms of individuals, the controller is required to implement technical and organisational measures including data protection policies to ensure compliance with the regulations. The controller is to review and update the measures when necessary.

The codes of conduct described in the GDPR Article 40 and the approved certification mechanisms described at Article 42 may be used as ways of demonstrating compliance with the obligations of the controller.

## **21. Data Protection by Design and by Default**

The controller is to take into account the state of art, the cost of implementation, together with the varying risks to the rights and freedoms of individuals posed by personal data processing, and implement appropriate technical, and organisational methods designed to implement data protection principles. Safeguards are to be integrated into the processing, in order to be compliant with the regulation and to protect the rights of data subjects.

The controller is to ensure that by default, and through technical and organisational methods, only personal data that is necessary for each specific purpose is processed. This applies to both the amount of data collected and to

the extent to which it is processed, as well as to its storage and its accessibility, in particular control of access. An approved certification mechanism as described in the GDPR at Article 42 may be used as an element to demonstrate compliance with the requirements.

## **22. Processor**

Ravenair processes all its own data within its own volunteer workforce and does not contract out its processing requirements. The following requirements apply to Ravenair acting as both the controller and the processor:

- (a) Processing will not be undertaken by another processor without a specific written contract between the controller and the processor. Any other processor engaged by Ravenair will need to guarantee that it meets the requirements of the regulation and be willing to permit Ravenair to audit that compliance.
- (b) Persons authorised to process personal data must commit themselves to confidentiality.
- (c) Persons authorised to process personal data are to take all appropriate measures, as determined by the processing procedures to ensure the security of personal data.
- (d) Persons authorised to process personal data are not to permit another person to process that data without the written authorisation of the controller.
- (e) Any person who has authorised access to personal data under the authority of the controller not process that data except on instructions from the controller, unless required to do so by law.

## **23. Records of Processing Activities**

1. The controller is to maintain a record of processing activities under its responsibility. The record must contain the following information, which may be found at Appendix A:

- (a) The name and the contact details of the controller.
- (b) The categories of the data subjects and of the categories of personal data.
- (c) The purposes for the processing.
- (d) The categories of recipients to whom personal data has been or will be disclosed.
- (e) Where possible, the envisaged time limits for erasure of the different categories of data.
- (f) Where possible, a general description of the technical and organisational security measures.

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2. The data processor is to keep a record of all processing activities carried out on behalf of the controller. Since Ravenair is also the processor, these requirements are fulfilled through para 1 above.

3. The requirements specified in paragraphs 1 and 2 must be in writing, including in electronic form.

4. The controller and the processor are required to make the records available at the request of the ICO.

5. The requirements of para 1 and 2 apply to organisations employing 250 or more persons, or where the processing carries a high risk to the rights and freedoms of individuals, or the processing is frequent, or the processing includes special categories of data or data relating to criminal convictions and offences.

### **24. Cooperation with the ICO**

The controller and the processor are required to cooperate with the ICO.

### **25. Security of Personal Data**

As set out at para 25, appropriate security appropriate to the risk may be achieved by a number of methods, including:

- (a) Pseudonymisation and encryption of personal data.
- (b) The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems.
- (c) The ability to restore the availability and access to personal data in a timely manner in the event of physical or technical incident.
- (d) A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of processing.

In assessing the appropriate level of security, risks associated with processing, in particular, accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or processed. The GDPR Articles 40 and 42 describe a code of conduct and an approved certification mechanism, which may be used as elements to demonstrate compliance with these requirements.

### **26. Notification of a Personal Data Breach to the ICO**

Where a breach of personal data has occurred, the controller is to inform the ICO within 72hrs of the breach being detected, unless the breach is unlikely to result in a risk to the rights and freedoms of the data subjects. If not submitted within 72hrs, the report shall be accompanied by reasons for the delay.

The processor is required to inform the controller of a breach without undue delay.

When notifying the ICO, the controller shall include the following:

- (a) Describe the nature of the personal data breach, and where possible the categories and approximate number of data subjects.
- (b) Provide contact details of a person who can provide more information, who will be the Data Protection Officer if one has been appointed.
- (c) Described the likely consequences of the personal data breach.
- (d) Describe the measures taken by the controller to address the breach, including measures to mitigate its adverse effects.

Where it is not possible to provide all the information immediately, the information may be provided as soon as possible afterwards without further undue delay.

Following any personal data breach the controller is to record the facts relating to the breach, and the remedial action taken to prevent recurrence.

## **27. Communication of a Personal Data Breach to the Data Subject**

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. Clear and plain language shall be used, and the communication is to include all the information to be reported to the ICO at para 33 above, and the remedial action taken to prevent recurrence.

Where it would involve disproportionate effort to inform data subjects of a breach of personal data, a public notice may be used, providing the data subjects are informed in an equally effective manner.

## **28. Data Protection Impact Assessment**

Where there is a high risk to the rights and freedoms of individuals posed by personal data processing, particularly when introducing new technology, the controller is to carry out a data impact assessment. In respect of the personal data processing carried out by Ravenair, no data protection impact assessments are required, due to the nature, size and availability of the processing it undertakes.

## **29. Data Protection Officer**

Ravenair has appointed Robert Saile, Ravenair Operations as data protection officer who will take a lead role in data protection issues, respond to requests from data subjects, report any data breaches to the ICO and data subjects, and act as a single point of contact for data protection issues.

## **30. Codes of Conduct**

Ravenair is committed to the BBGA industry code of conduct.

**31. Certification**

Ravenair is not certified by any certification body to carry out data processing. Certification is not a requirement under GDPR.

**32. Right to Lodge a Complaint with a Supervisory Authority**

Every data subject has the right to lodge a complaint with the ICO if the data subject believes that the processing of their data infringes the GDPR.

**33. Right to an Effective Judicial Remedy against a Supervisory Authority**

A data subject has the right to a judicial remedy against a legally binding decision of the ICO concerning them. The data subject also has the right to a judicial remedy if the ICO does not handle a complaint or does not respond to a complaint within 3 months to update the complainant on the progress of the complaint or its outcome.

**34. Right to an Effective Judicial Remedy against a Controller or Processor**

Regardless of any other remedy, including lodging a complaint with the ICO, a data subject has the right to an effective judicial remedy where the data subject believes that the processing of their data infringes the GDPR.

**35. Training**

All required staff at Ravenair will receive initial and bi-annual recurrent Data Protection training. Training will also be given when major changes to Data Protection legislation are published. Knowledge will be assessed via a quiz.

**36. Records of Processing Activities**

The lawful basis for the processing of the following personal data is legitimate interest.

Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Name	Necessary means of differentiating between people to allocate tasks and resources. Processed in order to be able to communicate with each Member of Staff/Customer/Contractor.	Entirely reasonable and within the expectations of business.	Low impact.

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<b>Category of Personal Data</b>	<b>Purpose. (Why is the data being collected?)</b>	<b>Necessity. (Is it reasonable, or is there another way of going about it?)</b>	<b>Balance. (Does the impact of the processing override the legitimate interests?)</b>
Role at Ravenair	A role is allocated by Ravenair.	It is necessary for a commercial business to assign roles to aid the productivity of the business.	Very Low Impact.
Postal Address	Processed so that Ravenair is able to communicate with each Member of Staff/Customer/Contractor to pass essential information.	Entirely necessary to communicate by for the purposes outlined.	Low impact.
Contact Details inclusive of Mobile Telephone Number, Landline Telephone Number and Email Address.	Processed for the purposes of routine communication of essential Company information and to communicate in the event of an emergency.	Necessary to be able to communicate essential information, and be able to communicate immediately with Members of Staff/Customers/Contractors	Low impact.
Personal Details inclusive of Date of Birth, Passport Number, Driving Licence Details, Curriculum Vitae.	The information is collected in order for Ravenair to inform any outside regulated organisation of any business activities, e.g. General Aviation Reports for aircraft leaving the UK CTA or Liverpool John Lennon Airport Authorities for the application for airfield driving permits etc.  Information is stored on password protected IT systems.	Necessary to provide information in the ongoing requirements of the business in line with regulation and legal obligations.	Low Impact.  The information is correctly stored by Ravenair for the required amount of time and then responsibly erased IAW legal obligations.

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Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Next of Kin / Emergency Contact Details	Processed in order to be able to contact nominated person(s) in the event of an emergency.	Ravenair must be able to inform NoK when a serious event occurs and the individual is incapable of making contact him/herself.	Medium Impact.  Ravenair may be processing the contact details of a person not associated directly with the Company, but it is in the interests of the individual that the nominated person is contacted, and it is within the expectations of the nominated person that they would be contacted in the event of an emergency, and that their details would be need to be processed for this purpose.
Visual Images / Photographs	<p>To create Company Identification badges and Security Passes to ensure the integrity of the Company Site from any unwanted intruders.</p> <p>To apply for Liverpool John Lennon Airport Security Passes to carry out Company duties.</p> <p>To provide marketing material to publicise the Company.</p>	<p>The facial shot is necessary to determine the identity of the individual.</p> <p>Further pictures full or partial may be used for marketing purposes.</p>	Medium Impact.

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Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Financial Banking Details including National Insurance Number	To ensure that the correct payment details are recorded in order to recompense Members of Staff and Contractors and Suppliers.	Necessary to ensure that Ravenair pays collects all monies owed for work carried out.	Medium Impact.  Financial information is necessarily shared with financial institutions, and its retention by those institutions is in accordance with their own policies and legal requirements.
Criminal Conviction Details	To ensure that the correct details are disclosed to the directed parties as per the legal obligations	Necessary for the purpose of obtaining Aviation Security Clearances to carry out Company tasks.	Low Impact.  This document is kept by the individual and presented to the LJLA authorities so will fall under their GDPR Policy.
Training Records and Training Qualifications	Training information is not shared externally. It is shared internally with the Safety and Compliance manager, Operations Manager, Flight Training Manager and any P1 that needs to know who is under a duty to know crew / TS qualifications. Training info is retained on Google Drive with password protection.	Necessary for the purposes of allocating the correct individual to the specific task.	Low Impact.  The documents are restricted to only those mentioned adjacent.
Accident Records	Records of Accidents are filed following an accident / incident that may occur on site.	Necessary to provide an audit trail for the purposes of medical provision and for any potential insurance claims post event.	Potential High Impact.  Actual Low Impact.

Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Disciplinary Records	Disciplinary data is collected to ensure that incidents / occurrences that involve staff discipline are recorded.	Necessary for the purposes of staff appraisals and potential Human Resources situations	Low Impact.  The documents are restricted to only those mentioned adjacent.
Health	Ensuring the availability of healthcare for all at Ravenair. Ensuring the safety of those persons being treated and others (restricted access to medicines, suitable supervision). Enabling Ravenair to assess risk in relation to Members of Staff/Customers/, their state of health and the activities undertaken, and for third party activity providers to be able to do the same. To enable Ravenair to ensure that adequate provision is made for health needs and to do all that is reasonable to cater for diverse health requirements, in order to encourage inclusion.	Necessary to protect the health of those employed by Ravenair (full time or part time), those involved in the business activities of Ravenair, Company visitors and to ensure inclusion.  Necessary to ensure the safety of the above.	High Impact.  It is in the interests of personal assistance, Ravenair will ensure that:  Allergy needs are met.  Those with a disability/limiting condition are supported to be included.  The needs, disabilities or health conditions of individuals are catered for without prejudicial treatment.

### 37. Access to Personal Data

(i) Access to Personal Data.

You have the right to access all personal data that we hold about you.

(ii) Right to Rectification.

You have the right to have any data we hold about you corrected without delay, if it is in error, and for any incomplete data to be made complete.

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### (iii) Right to Erasure.

You have the 'right to be forgotten', and for your personal data to be erased without undue delay under certain conditions. You may ask for the personal data we hold about you to be erased when we no longer require it for its original purpose, or when we have asked you for your consent as the lawful basis of processing your personal data and you withdraw your consent, or when you object to the processing of your data when the legal basis for the processing is our legitimate interest, but only if we cannot demonstrate that our legitimate interests override your interests, or if your personal data has been processed unlawfully.

### (iv) Right to Restriction of Processing

You have the right to ask us to restrict the processing of your data. This means that, apart from storage of the data, we may only process your data with your consent, with certain exceptions explained in the Ravenair Data Retention and Sharing Policy 2018. You may ask us to restrict the processing of your data, if you contest the accuracy of the data we hold about you, or the processing of the data we hold about you is unlawful, but you do not wish us to erase the data, or we no longer need to process the data we hold about you, but you wish us to retain the data so that you can use it in a legal claim, or you object to the processing of the data we hold about you pending a decision about whether or not Ravenair's legitimate interests override your interests.

### (v) Right to Object

You have the right to object to Ravenair processing the data we hold about you, when the lawful basis of our processing is described as legitimate interest. You will see that most of the data we process is done so under legitimate interest. If you object, we will have to demonstrate that Ravenair's legitimate interests override yours

### (vi) Right to Portability

When you have supplied personal data to Ravenair in an automated format, i.e. an electronic application form, and when we have asked you to give consent for the processing of the data you have provided, then you have the right to ask for the data to be provided to you or to another organisation in a portable format. If you make a request for data portability, the information will be supplied in a spreadsheet format such as CSV.

(c) Where the lawful basis of processing is consent, the right to withdraw consent at any time, without affecting the lawfulness of data processing based on consent before its withdrawal.

When the lawful basis of the processing of your personal data is consent, you have the right to withdraw your consent at any time. However, if you withdraw your consent, that does not affect the lawfulness of the processing of your data that took place while your consent was in place.

(d) The right to lodge a complaint with the ICO.

## Ravenair Data Retention and Sharing Policy

You may complain at any time to the Information Commissioner's Office if you are not satisfied with the way that Ravenair is processing your data. See <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113.

(e) Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as the data subject is obliged to provide the personal data and of the possible consequence of failure to provide such data.

The provision of personal data to Ravenair is required in order to safeguard the legitimate interests of Ravenair, its staff, customers, contractors and visitors.

### 38. Data Sharing

The inclusive list of recipients to whom personal data has been or will be disclosed.

Ravenair Company Directors  
 Ravenair Company Management  
 Government Regulatory Authorities  
 LJLA Authorities  
 Emergency Services  
 Marketing Purposes with the permission of the individual whose data is being used  
 Financially and Legally Qualified Persons or Organisations

### 39. Data Retention Periods

Personal Data will be retained in accordance with the timescale displayed in the table below for staff members, visitors, contractors and customers.

Category of Personal Data	Envisaged Retention Period
Name	Duration of employment / association with Ravenair business interests
Role at Ravenair	Duration of employment / association with Ravenair business interests
Postal Address	Duration of employment / association with Ravenair business interests
Contact Details inclusive of Mobile Telephone Number, Landline Telephone Number and Email Address.	Duration of employment / association with Ravenair business interests
Personal Details inclusive of Date of Birth, Passport Number, Driving Licence Details, Curriculum Vitae.	Duration of employment / association with Ravenair business interests
Next of Kin / Emergency Contact Details	Duration of employment / association with Ravenair business interests
Visual Images / Photographs (Consent)	No retention period set
Financial Banking Details including National Insurance Number	Duration of employment / association with Ravenair business interests
Criminal Conviction Details	Duration of employment / association with Ravenair business interests

## Ravenair Data Retention and Sharing Policy

Training Records and Training Qualifications	3 years post-employment / association with Ravenair business interests
Accident Records	3 years post-employment / association with Ravenair business interests
Disciplinary Records	3 years post-employment / association with Ravenair business interests
Health	3 years post-employment / association with Ravenair business interests

All personal data will be correctly disposed of at the time scales tabulated above in accordance with The General Data Protection Regulation (EU) 2016/679 (GDPR).