Irish Air Line Pilots Association (IALPA) DATA PROTECTION: Effective 25 May 2018

We respect your trust in us to use, store and share your information. In this notice, we explain how we collect personal information about you, how we use it and how you can interact with us about it. We try to keep this notice as simple as possible but if you are unfamiliar with our terms, or want more detail on any of the information here, please contact us directly by email or post.

1. Who we are: Irish Air Line Pilots Association

When we talk about õIALPAö, or õusö or õweö in this notice, we are talking about Irish Air Line Pilots Association (IALPA), a branch of Forsa Union. We only share your information within IALPA/Forsa to help us provide our services, comply with regulatory and legal requirements, and improve our services.

2. Data Protection Officer

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. You can contact our Data Protection Officer at:

Data Protection Officer, Forsa, Nerneyøs Court, Dublin 1, Ireland. Tel:+353 (1) 8171500 or:

Data Champion, IALPA, Corballis Park, Dublin Airport, K67D560. Tel: +353 (1) 8445272

3. How we collect information about you

We collect personal information from you, for example when you apply for membership or look for advice. We also may collect information through our website, apps, social media, and our internal discussion forums.

4. Type of data we retain

Your membership application details including:

Name, Email Address, Phone Number, Address, Country of Residence, Licence State of Issue, Current Employment Status, Current Employer, Staff Number, Rank, Base, Aircraft Type

Basic Salary and Bank Details (for the purpose of financial transactions relating to your membership)

All past and present public posts on our internal messaging forums (As per our website terms and conditions)

5. How we keep your information safe

We protect your information with security measures under the laws that apply and we meet international standards. We keep our computers, files and buildings secure. When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information

6. How long we keep your information

To meet our legal and regulatory obligations, we hold your information while you are a member and for a period of time after that. We do not hold it for longer than necessary.

7. Meeting our legal and regulatory obligations

To use your information lawfully, we rely on one or more of the following legal bases:

Éperformance of a contract;

Élegal obligation;

Éprotecting the vital interests of you or others;

Épublic interest;

Éour legitimate interests; and

Éyour consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks, and delete it once we no longer have to keep it. We may also share information about you with third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our services.

8. Consent

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of products and services which may be of interest to you. We may also contact you to inform you about meetings or to share relevant information with you. We may do this by phone, post, email, text or through other digital media. You can decide how much direct marketing you want to accept when you apply for membership. If we ever contact you to get your feedback on ways to improve our products and services, you have the choice to opt out. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us via the email address admin@ialpa.net with the subject line: oRemoval of Consent. Alternatively, you can log on to your account and update your details to opt-outø of any future communications.

9. How we use your information

We use information about you to:

Éprovide relevant cover and services;

Éidentify ways we can improve our services;

Émaintain and monitor your services;

Éprotect both our interests;

Émeet our legal and regulatory obligations; and

Édecide and recommend how our services might be suitable for you.

To provide our products and services under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our products and services.

10. Your information and third parties

Sometimes we share your information with third parties. For example to:

Éprovide products, services and information;

Éanalyse information;

Éresearch your experiences dealing with us;

Écollect debts;

Éprevent financial crime;

Étrace information; and

Éprotect both our interests.

For example, the Loss of Licence and Income Continuance Protection Scheme offered for pilots via IALPA are reliant on you being a member of IALPA. The third party providers of these policies will contact us to confirm that you are a member of IALPA and we will confirm this if required.

We expect these third parties to have the same levels of information protection that we have. We also have to share information with third parties to meet any applicable law, regulation or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and tell law enforcement agencies, which may be either in or outside Ireland.

11. International transfers of data

We may transfer your personal information outside of the European Economic Area (EEA) to help us provide your products and services. We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

12. Your personal information rights

You will find information about your rights, when they apply and our responsibility to you on our website www.ialpa.net

You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.

Updating and correcting your personal details. It is your responsibility to ensure we have the most up-to-date and correct personal information for you. This can be updated via our website or by contacting the IALPA Office directly via post.

Removing consent: You can change your mind wherever you give us your consent, such as for direct marketing, or using your sensitive information, such as medical data.

Restricting and objecting: You may have the right to restrict or object to us using your personal information or using automated decision making.

Deleting your information (your right to be forgotten). You may ask us to delete your personal information.

Moving your information (your right to Portability). The right to data portability is set out in Article 20 of the GDPR. It allows individuals to obtain their personal data in a structured, common and machine-readable format and to transfer this personal data freely to another controller. If it is technically possible, the individual can even request that data is transferred directly from the old to the new controller.

When you contact us to ask about your information, we will ask you to identify yourself. This is to help protect your information.

13. Requesting Access to Your Information : Data Subject Access Requests (DSAR)

Recital 63 of the GDPR states, õa data subject should have the right of access to personal data which have been collected concerning him or her, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing.ö

All Data Subject Access Requests (DSAR) must be made in writing via our DSAR form which is available for downloading on our website and must be returned (accompanied by a copy of photo ID) to the following:

By Post:

Danni Hickey, Data Champion, IALPA, Corballis Park, Dublin Airport, Co. Dublin K67D560 **By email:**

<u>admin@ialpa.net</u> with the subject line õ*Data Subject Access Request*ö.

The statutory time limit for responding to DSAR¢s is 40 days.

14. Making a Complaint

If you have a complaint about the use of your personal information, please let a member of staff in your branch know, giving them the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can register a complaint through our branches, our Website, by phone, by email or in person at your branch. We ask that you supply as much information as possible to help our staff resolve your complaint quickly. You can also contact the Data Protection Commission in Ireland at www.dataprotection.ie.

15. Updates to this notice

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website www.ialpa.net