

## British Microlight Aircraft Association - Personal Data Management Notice Issued 11 May 2018

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### Introduction

The purpose of this Notice is to inform readers of the format in which the personal information data is held by the BMAA; why that data is held; what is held; who has access and the safeguards that are in place to secure that data.

### Data

The BMAA holds personal information in electronic and paper formats. These formats have developed as the BMAA has grown from a very small organisation to the one that it is now in 2018 with in excess of 3,600 members.

**Principle Database.** In 2017 a database was commissioned to store information about each member and about each aircraft that the BMAA has an airworthiness responsibility for. Where an aircraft is owned by a member the records of each are linked, although an aircraft's information can be viewed without viewing the linked member's information and vice versa. Prior to the introduction of the database described above in 2017 an alternative database was used that has now been discontinued.

**Other data.** The BMAA holds personal information data that has a specialist purpose in electronic formats that are not part of the main membership and aircraft record database. These data records comprise:

- copies of applications for pilot licenses that have been processed by the BMAA in its role as an organisation approved by the Civil Aviation Authority (CAA) to make a recommendation for the issue of a National Private Pilot's Licence with a Microlight Class Rating, or the addition of a Microlight Class Rating to an existing licence;
- applications for the grant of a Microlight Examiner Authority which require a recommendation by the Microlight Panel of Examiners. These records are used for validation of applications for the grant of a National Private Pilot's Licence with a Microlight Class Rating, or the addition of a Microlight Class Rating to an existing licence;
- training and test records for microlight flying instructors. These records are used for validation of applications for the grant of a National Private Pilot's Licence with a Microlight Class Rating, or the addition of a Microlight Class Rating to an existing licence;
- records of airworthiness approval applications made to the BMAA Technical office.

**Paper records.** Some documents that arrive at, or are generated by, the BMAA are held as paper documents. Paper documents are filed within the BMAA premises.

Where practical these paper documents are subsequently converted to electronic copies. Where the document is converted the original hard copy is destroyed by shredding. All

aircraft records, instructor and examiner records, and certain membership records were at one time stored as hard copy.

## Why data is held

As a membership organisation the BMAA holds records of each of its members primarily for administrative purposes and compliance with law relating to processing membership applications and renewals and passing on information to members that it is felt that they need to know or would be interested in. The administration processes enabled by the information held are also needed for processing other tasks directly on behalf of each member, for example the revalidation of a Permit to Fly or the delivery of publications by post or email.

Information on each aircraft for which the BMAA takes any airworthiness oversight responsibility is also held by the BMAA. Inevitably some of that information contains personal information data relating to owners and previous owners of the aircraft. It may also contain personal information about other individuals that have been connected to the operation of the aircraft such as an inspector or engineer.

Maintaining a comprehensive record of each aircraft's historical information is a vital contributor to ensuring ongoing airworthiness.

## What data is held

The table below details the personal information held in the BMAA master database.

The information has all been provided by the member or linked to the member as Custom data for BMAA administration purposes.

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### Personal Data

<b>BMAA Membership No.</b>	For identification purposes.
<b>Name</b>	For identification purposes.
<b>Date of birth</b>	To assist in identification where more than one member might share a name. To confirm age where a membership category may be limited by age range. For membership analytical purposes.
<b>Postal address</b>	For contact purposes. For delivery of the BMAA Magazine, <i>Microlight Flying</i> . For membership analytical purposes.
<b>Telephone number(s)</b>	For contact purposes.
<b>Email address</b>	For contact purposes.
<b>Membership type</b>	To ensure the correct level of membership fee is collected at the correct interval.

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<b>Membership payment record</b>	To record membership fees paid, amount and method.
<b>Bank details</b>	Only held for members who pay by Direct Debit
<b>Custom data</b>	
<b>Test Pilot Yes or No</b>	To maintain a record of holders of this qualification. To be used for confirming the validity of applications made for airworthiness purposes where a Test Pilot's input is required. To be able to search for group contact or management purposes. To be able to search for group contact or management purposes.
<b>Aircraft Inspector Yes or No</b>	To maintain a record of holders of this BMAA Authorisation. To be used for confirming the validity of applications made for airworthiness purposes where an inspector's input is required. To be able to search for group contact or management purposes. To provide details for the BMAA website at the request of the individual to whom the information is linked.
<b>Flying Instructor qualifications</b>	To maintain a record of holders of this qualification. For the purpose of checking the validity of flight training when processing a licence application. To be able to search for group contact or management purposes.
<b>Flight Examiner qualifications</b>	To maintain a record of holders of this qualification. For the purpose of checking the validity of examinations when processing a licence application. To be able to search for group contact or management purposes.
<b>Flying Club or School information</b>	To provide details for the BMAA website at the request of the individual to whom the information is linked.

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## How long is data held for?

Membership data in the BMAA database is held routinely for a period of two calendar years after a membership has lapsed. This allows returning Members to retain their unique membership number and reduces the need for information once held to be re-entered into the system by the Member or a member of staff. Following the two-year period the data entry will be permanently deleted.

A Member can ask for all, or some of their Personal information to be deleted at any time. If this request is made during a period of membership the BMAA will not be able to provide them with services that require confirmation of membership or direct contact. The Member

will be informed of the current level of deletion and when all data will be deleted with the reasons why.

Some Custom data will be retained where it relates to other aspects of the Member's activity within the BMAA. If a Member has been authorised as a BMAA Inspector, Check Pilot or Test Pilot any information held in airworthiness documentation will be retained, together with a record of any authority identifier or specified authorisation.

Aircraft records are held by the BMAA for a minimum period of two years after the aircraft has been destroyed or permanently withdrawn from use. The BMAA is not allowed to destroy aircraft records without the express permission of the CAA.

Applications for pilot licences are held for an unlimited period in case the validity of an application is called into doubt at any time. The CAA requires this information to be kept, and does not have that information itself.

Records of flight instructors and examiners are held for an unlimited period in case the validity of any training or examination undertaken by them is questioned at any time.

## **Access to information**

The BMAA does not sell or share any information. Occasionally the BMAA is requested to provide information for legal investigations by the CAA, the police, or during accident investigations by the Air Accident Investigation Branch of the Department for Transport (AAIB). These requests are only complied with on receipt of approved data request documentation and in accordance with the law.

Day to day access to data by BMAA staff members is required to carry out administration tasks as described above in the section [Why data is held](#).

BMAA approved aircraft Inspectors are able to access some aircraft data that is held on the central database at the request of the aircraft owner. They are not able to access data held in other areas.

Members can access areas of their own data records and some data of aircraft which they own.

Members can request details of their personal information held by the BMAA. Such data will be provided within 15 working days by postal service.

## **Data safeguards – data gathering**

The BMAA only requests sufficient personal data to be able to identify an individual for the purposes outlined above in the section [Why data is held](#).

Only BMAA Staff receive data and are responsible for storage or destruction as appropriate.

Personal Information Data is gathered directly from each individual by way of a form submitted electronically or in paper format.

Membership data can be submitted electronically through the BMAA website using a secure connection (https), or on a paper form to be entered into the electronic database by a staff member in a similarly secure manner. Paper forms are subsequently destroyed by shredding after accuracy has been confirmed.

Personal information submitted for pilot licensing purposes is always submitted in a paper format.

Pilot licence applications are copied and stored as electronic copies of the paper forms on a secure server. Paper forms are subsequently destroyed by shredding.

Instructor applications are copied and stored as electronic copies of the paper forms on a secure server. Paper forms are forwarded to the CAA.

Examiner applications are copied and stored as electronic copies of the paper forms on a secure server. Paper forms are forwarded to the CAA.

Personal information submitted for airworthiness purposes can be submitted electronically through the BMAA website using a secure server, or by email. Electronic submissions are held on the BMAA server.

Personal information submitted for airworthiness purposes is sometimes submitted in a paper format. Electronic copies of the paper forms are stored on a secure server. Some paper forms are subsequently destroyed by shredding. Where information included is part of an airworthiness approval the paper copies may be kept

### **Data storage and protection**

Electronic storage. The BMAA server is housed within the BMAA offices. The offices are locked when not in use. The offices have a burglar alarm which is subject to routine maintenance.

The security of data held on the server is protected by anti-virus and malware software which is serviced by a professional IT company. The server is subject to routine security check carried out by an independent IT security company as required by the BMAA bankers.

### **Data back-up**

Data back-up is by electronic transfer of encrypted information on a daily basis to an offsite server. No backup copies are held in any other format.

### **Open door policy**

The BMAA is very aware of the rights of the members with regard to personal data use. At any time members are invited to query what is held, why and how it is used.