



PRIVACY AND DATA COLLECTION POLICY

WARNING

Information contained in this document is
intended for flight simulation purposes only.

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Control Pages

Document Identification

Document Identification	
Type	Policy
Version	1.1
Issue Date	09JUN20
Effective Date	09JUN20
Scope	This policy applies to all the constituent components that comprise the VATSIM network. It applies to all levels of the organisation, including, but not limited to, the Founders, the Board of Governors, the Executive Committee, the component Regions, their subsidiary Divisions, and all structures comprising each division.
Prepared by	VATSIM Board of Governors
Approved by	VATSIM Board of Governors on 05JUN20
Review date	No later than 24/05/2021
Identification	VATSIM-POL-201_Privacy and Data Collection Policy

Revision Records

Revision Number	Date	Description of Change	Author
1.0	25/05/2018	Initial Document	BOG
1.1	09JUN20	Updated document to remove requirement for parental consent and minor corrections	BoG

Related Documents

Document Name	Document Identification
Data Protection and Data Handling Policy	VATSIM-POL-203_Data Protection and Data Handling Policy

1.1 Registration

In order to use any of our online services, you must first complete the VATSIM registration form. During registration, you are required to give your contact information including name and an email address. This information is used to contact you about the services on our site for which you have expressed interest. Demographic information may be collected to provide targeted services, incorporate network security, and comply with appropriate laws regarding children. Cookies, as well as other means of personal unique identification, will be used during the registration process. However, any personal data submitted will be kept strictly confidential and used only to identify you to the registration system.

1.2 Information Collection and Use

VATSIM is the sole owner of the information collected on this site. It will not sell, share or rent this information to others in ways different from what is disclosed in this Privacy & Data Collection Policy. VATSIM collects information from its users at several different points on its website.

VATSIM has a number of responsibilities to you with regard to the collection of your personal data:

1. We have a responsibility to be accountable and transparent in how and why we collect, store and process your data. Members with access to your data are bound by our Data Handling Policy, which details and controls how we do this.
2. We have a responsibility to only collect, store, and process your data on a lawful basis. VATSIM asserts it has a legitimate interest to do so in order to ensure the smooth functioning of the network and to ensure interactions between members whilst online conform to the User Agreement, Code of Regulations, Code of Conduct and other applicable VATSIM policies. This legitimate interest constitutes a lawful basis for data collection, storage, and processing.
3. We have a responsibility to ensure that data protection is managed in accord with our Data Handling Policy and our Data Protection Impact Assessment.
4. We have a responsibility to report any data breach to the appropriate authorities.

You as a user of VATSIM have a number of rights:

1. You have a right to be informed why we collect your data. This policy explains these reasons to you.
2. You have a right to access your data and view the data collected on you. This data will be released to you on written request. To protect the privacy of VATSIM staff members the names of individual staff members making entries on your record and other security measures may be redacted.
3. You have a right to rectify data you believe to be inaccurate. We encourage members to ensure details such as email address are kept up to date through the self-service membership dashboard. If you believe other data held is incorrect you can raise a support ticket with the Membership Department to seek to have it corrected.
4. You have the right to request your data be erased from the VATSIM systems. This will result in the termination of your membership of VATSIM.
5. You have the right to request we restrict the processing of your data in the event of a dispute, this may restrict your ability to connect to the network.
6. You have the right to object to our legitimate interests. While your objection is being considered, processing of your data may be frozen, and this may restrict your ability to connect to the network.

1.3 Personal Statistical Information

In the normal course of connecting to the VATSIM network, certain personal statistical information will be collected. This information includes, but is not limited to, full name, the time and duration of a member's connection, the callsign(s) used, flight plan(s) filed and other information necessary and useful for the maintenance of the network and your account. This personal information can be seen by other members and/or VATSIM affiliates and partners. In addition, this information may also be available to the general public via the internet. For further information regarding the availability of a member's personal statistical information, please see the VATSIM User Agreement.

If at any time you feel that VATSIM is not following this privacy policy, you should contact the Vice President, Web Services at the email address posted on the VATSIM website.

1.4 Cookies

VATSIM may use cookies on its site. A cookie is a piece of data stored on your hard drive which is used to track you through our site and for network security. Some of our affiliates may also use cookies on our site. However, VATSIM has no access to or control over these cookies.

1.5 Log Files

VATSIM uses IP addresses to analyse trends, administer its site, track user's movement, and gather broad demographic information for aggregate use. IP addresses are linked to personally identifiable information for the purposes of network security.

1.6 Sharing of Certain Information

VATSIM may share aggregated demographic information with third parties. This is not linked to any personal information that can identify any individual person.

1.7 Links to Outside Websites

This website contains links to other sites. Please be aware that VATSIM is not responsible for the privacy practices or policies of such other sites. VATSIM encourages its members to be aware when they leave its website and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by the VATSIM website or while connected to the network.

1.8 Required NOTAM Subscription

All VATSIM members are subscribed to the distribution of a NOTAM list via email. This list is used to distribute information of an urgent nature to all users of the VATSIM network directly relating to the functioning of the network. Subscription to this distribution list is automatic and mandatory for all users and is a condition of membership to VATSIM. This list is not used for any purpose other than official business. Your consent will be requested for other email distributions, such as marketing and other business.

1.9 Surveys, Contests and Marketing

From time-to-time, VATSIM and/or its affiliates and partners may request information from you for surveys or contests or may wish to contact you to make you aware of new initiatives or features on VATSIM. Participation in these surveys or contests, and receiving marketing communications, is completely voluntary and you, therefore, have a choice whether or not to participate. Information requested may include contact information (such as name and shipping address) and demographic information (such as zip code or age). Contact information will only be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site and/or the VATSIM network.

1.10 Security

VATSIM takes every reasonable precaution to protect its members' information. When you submit sensitive information via the VATSIM website, your information is protected both online and offline.

VATSIM will make all reasonable efforts to protect member information off-line. All member information, not just the sensitive information mentioned above, is restricted. This information is password protected and only those people who need the information to perform a specific job (for example Administrators, Conflict Resolution Staff, Membership Staff, Supervisors, and Divisional Directors) are granted access to personally identifiable information.

The VATSIM Data Handling Policy details the circumstances and the manner under which those authorised to see and access your data may do so. All persons with such access are required to indicate their agreement to be bound by this policy before access is granted. Access to this policy itself is restricted to those individuals with a right to higher levels of access as it details internal security procedures used by VATSIM to secure your data.

If you have any questions about the security of the information you submit to the VATSIM website, you can send an email to the Vice President, Web Services at the email address posted at the VATSIM website.

1.11 Minimum Age Requirement

VATSIM accepts memberships from persons of the age of 13 and over.

VATSIM does not accept memberships from persons younger than the age of 13 under any circumstances and without exception. In addition, VATSIM does not allow any person under the age of 13 to join or post in its forum or to participate in the use of any online chat. VATSIM shall make every reasonable effort to prohibit persons under the age of 13 from participating in any of these venues.

Any account(s) created by persons under false pretences by persons under the age of 13 which are discovered and verified by VATSIM shall be immediately cancelled.

1.12 Notification of Changes

If VATSIM decides to update or change its privacy policy, notice of such changes shall be posted on its website so members are always aware of what information is collected, how it may be used and/or disclosed. If at any point VATSIM decides to use personally identifiable information in a manner different

from that stated at the time it was collected, it will notify members by email so that they may decide whether to maintain or cancel their account.