Data Protection Policy

Contents

1. Summary

1.1 Definitions

VATSIM – Virtual Air Traffic Simulation Network is a non-profit organization that manages a dedicated, worldwide virtual, aviation network that provides the software needed to fly software flight simulators in the virtual airspace. Information about the organization is available at https://vatsim.net

VATEMEA – VATSIM Europe, Middle East and Africa Region – VATSIM Organizational unit of the European, African and Middle Eastern region. Information can be found at https://vatsim.eu

VATEUD – VATSIM European Division – division of continental Europe part of VATEMEA. Additional information can be found at https://vateud.net

VATAdria – VATSIM Adria – is an established member of the VATEUD division responsible for the virtual airspace of multiple FIRs on the VATSIM network.

VATAdria Board – supervision persons within the VATAdria Policy

Communication channels – methods of communication between members in VATAdria and persons responsible for processing of your personal data in the VATAdria.

- E-mail – communication by e-mail with all addresses from the vatadria.net domain
- Forum – forum available at https://forum.vatadria.net
- Discord – official VATAdria channel on Discord platform
- Communication platforms – all interactive forms available on VATAdria website

The keywords in this document should be interpreted as follows:

- **“MUST”, “REQUIRED”, “SHALL”** – the definition is an absolute requirement of the specification
- **“MUST NOT”, “SHALL NOT”** – the definition is an absolute prohibition of the specification
- **“SHOULD”, “RECOMMENDED”** – there may exist valid reasons in particular circumstances to ignore a particular item, but the full implications must be understood and carefully weighed before choosing a different course
- **“SHOULD NOT”, “NOT RECOMMENDED”** – there may exist valid reasons in particular circumstances to accept a particular item, but the full implications must be understood and carefully weighed before choosing a different course
- **“MAY”, “OPTIONAL”** – item is truly optional.

2. Introduction

2.1. Scope

The purpose of this policy is to comply with the law, particularly the EU General Data Protection Regulations (GDPR).

2.2. Types of data

VATAdria collects data form its members and from third parties. All data collection is done with the express consent of the member obtained electronically before being afforded access to our services.

2.3. Type of data collected directly

While using our services, we collect data from and about you to facilitate our systems and to provide best user experience. This data includes:

- IP-address, connection and login information
- Training records / requests
- User messages / images
- Web services usage data
- Other user provided data

2.4. Types of data collected by third parties

To efficiently run our services and to have all needed data, we may need to receive data from third parties. This data includes:

1. VATSIM CERT
    a. VATSIM ID (or CID)
    b. Full name
    c. E-mail address
    d. Virtual Air Traffic Controller / pilot rating
    e. Registration date
    f. Country
    g. VATSIM Region, Division and Subdivision (e.g. vACC / ARTCC)
2. VATSIM Stats
    a. Callsign
    b. Position
    c. Name
    d. Timestamp
    e. Connection duration
3. Discord
    a. Discord ID
4. Moodle
    a. E-mail address
    b. Full name

To provide better services and to manage our Discord server we may provide data to third parties. We may also share data to VATSIM, or its associated or affiliated organization where deemed necessary for the execution of their official duties on the VATSIM network.

2.5. Policy provisions

VATAdria is committed to:

- Comply with both the law and good practice

  - The right of access
  - The right to be informed
  - The right of rectification
  - The right to data portability
  - The right to object
  - The right to restrict processing
  - The right of erasure
- Be transparent and hones about our data handling and processing to our members.
- Notify the relevant data handling authorities, if appropriate, even if legally not required to do so.

3. Liability

3.1. vACC Board

The VATAdria Board is responsible for the protection of personal data and the compliance of the relevant standards of services provided by the VATAdria. The list of vACC board can be found at https://vatadria.net/

3.2. Enforcement

VATAdria has a zero-tolerance policy towards inappropriate or unauthorized access to or sharing of personal data. Any such conduct will result in revocation of access rights of the said individual until such time the risks to personal data security have been mitigated.

4. Security

4.1. Scope

This section applies to all systems under the control of VATAdria and to all systems used to process personal data of its members by VATAdria or its staff or assistants to the staff

4.2. Security measures

VATAdria uses standard methods of encryption to safeguard personal data and monitors all systems for possible abuse or unauthorized access.

4.3. Risks

Main sources of threats to the security of the data stored by VATAdria, includes:

- Phishing attacks, i.e. Intentional forcing of unauthorized access to data stored on the server
- Unauthorized access by malware of infected systems
- Bugs on the software, allowing unauthorized (even accidental) access to data stored on the server
- Access by unauthorized VATAdria members

The first two threats consist in:

- Verifying all persons prior to granting access with knowledge of this privacy policy
- Encouraging authorized members to follow good security practices in their personal systems

The third risk is limited by the appropriate phase of tests of the implemented software.

The last risk is mitigated by logging access and rolling back changes made by those who previously granted access.

5. Saving and storing data

5.1. Scope

Most of the data used by VATAdria is transmitted directly through the internal VASTIM communication channels. The data indicated in 2.3 and 2.4 of this policy are stored only in the event of a justified need, specified in Legal basis.

5.2. Stored data update

Personal data stored by VATAdria are synchronized within the VATSIM Connect internal personal data exchange channels. Therefore, the data is not updated directly on the VATAdria servers; it is received form third servers. The concerned vACC members should address requests for data updates to the relevant VATSIM authorities.

5.3. Stored data

Data is stored in standard file system and databases. Access to these systems is controlled by secure direct access to control applications or via a secure web interface. Access is then controlled and protected against unauthorized access by standard measures such as access control based on limiting the access rights of individual access accounts.

5.4. Data storage period

VATAdria is obligated to store data in accordance with the Data Protection Policy and their processing of the VATSIM network. Removal requests may be processed by VATAdria in accordance with the legal basis, however, the removal of some processed data may require the intervention of VATEUD, VATEMEA or directly VATSIM, as the request may be outside the powers of the persons responsible for the vACC.

5.5. Archiving

Data archiving by the vACC does not include data stored on severs other than those belonging to VATAdria. Data on these severs is stored for a specified period of time and then archived in accordance with 2.3 or completely deleted.

6. Transparency of the data protection

VATAdria makes every effort to ensure that all members know what data and for what purpose their personal data is collected.

As specified in this document, data is collected to ensure the smooth functioning of the vACC so that members can enjoy the functionality of the VATSIM network.

7. The right to access to information

7.1. vACC responsibility

Requests for disclosure of information about processed personal data are within the competence and responsibility of the designated

8. Right to be forgotten

Acting on the basis of the applicable law mentioned in 2.1, VATAdria undertakes to delete data at the request of the applicant. The request to delete data is processed in the same way as the right to access to information described in 7. The procedure for submitting a request, verifying identity and determining the fees related to the procedures is set out in 7 of this policy.

Requests with a request to delete data should be sent to vACC Director

9. Legal basis

VATAdria ensures that it has a legitimate interest in collecting and storing the personal data described above. The reasons for this are as follows:

- VATAdria is a voluntary community that is an active member of VATEUD, VATEMEA and VATISM, promoting flight simulations and virtual are traffic control, and all members who wish to join have an obvious interest in such activities.
- Collected data is the minimum required to allow the smooth and optimal functioning of the vACC, solely for the enjoyment of its members.
- The data is necessary to enable the VASTIM Staff represented in VATAdria to properly manage the vACC, both in their day-to-day operations and in circumstances where the member(s) may be operating in a manner contrary to the rules and regulations governing vACC

10. Policy changes