

## PRIVACY POLICY

LAST UPDATE 1<sup>ST</sup> JAN 2023

We want you to know that we are committed to safeguarding the privacy of our customers as well as that of visitors to our website.

This means that, as a “data controller”, we will protect the data that we collect from you whilst you use our website, make a booking with us or while we are in contact with each other. We need to collect and use your data to enable the proper administration of our website, services and business. This will enable us to arrange transactions for you and to contact you with details of products and services that may be of interest to you.

We are legally obliged to maintain records for many reasons including taxation, auditing, security, marketing, insurance, risk management and for the defence of legal claims. Sometimes it is necessary to share your data to fulfil the requirements of some of the above reasons. Financial transactions relating to our website and services are handled by our payment services providers, [www.stripe.com](http://www.stripe.com) and [www.beyonk.com](http://www.beyonk.com). Details of their privacy policy are available at their website.

We will retain your data for legitimate business reasons for up to 24 months. This period may be extended if we are required to by legal reasons or other situations which may arise.

The hosting facilities for our website are situated in the United States. The competent data protection authorities have made an “adequacy decision” with respect to the data protection laws of this country. Transfers to this country will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities. You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

### **Your principal rights under data protection law are:**

- a. the right to access – you can ask for copies of your personal data;
- b. the right to rectification – you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- c. the right to erasure – you can ask us to erase your personal data;
- d. the right to restrict processing – you can ask us to restrict the processing of your personal data;
- e. the right to object to processing – you can object to the processing of your personal data;
- f. the right to data portability – you can ask that we transfer your personal data to another organisation or to you;
- g. the right to complain to a supervisory authority – you can complain about our processing of your personal data; and
- h. the right to withdraw consent – to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. You may exercise any of your rights in relation to your personal data by written notice to us.

**Amendments:**

We may update this policy from time to time by publishing a new version on our website, you should therefore check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of significant changes to this policy by email.

**Our details:**

This website is owned and operated by Boulton Flight Academy Ltd, trading as Spitfires.com. We are registered in England and Wales under registration number 07623458, and our registered office is at Hangar 8, Goodwood Aerodrome, Chichester, West Sussex, PO18 0PH, United Kingdom

**Our principal place of business is:**

Hangar 8, Goodwood Aerodrome, Chichester, West Sussex, PO18 0PH, United Kingdom

**You can contact us:**

- a. by post, to the postal address given above
- b. using our website contact form
- c. by telephone, on the contact number published on our website; or
- d. by email, using the email address published on our website

**Data protection officers:**

Our data protection officers are Matt Jones and Matt Ponsford