



Privacy Policy

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0. General

0.1. Introduction

Effective date: September 23, 2019 0000z

HvACC ("us", "we", or "our") operates the <https://hvacc.org> website and the applications that use HvACC subdomains, with the format https://*.hvacc.org, where "*" the name of the application ("Services").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Services. By using the Services, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://hvacc.org>

0.2. Other Policies

Hellenic vACC (HvACC) is a subdivision within VATSIM Europe Division (VATEUD). As such, all policies published by VATSIM, VATSIM Europe Region (VATEUR) and VATSIM Europe Division (VATEUD) are in effect within HvACC.

0.3 Related HvACC Policies

HvACC Data Protection and Handling Policy

0.3. Acronyms and Terms

HvACC	Hellenic vACC
VATEUD	VATSIM Europe Division
VATEUR	VATSIM Europe Region
Forum	The Hellenic vACC Forum (https://forum.hvacc.org)
Website	Unless defined, the Hellenic vACC website (https://hvacc.org)
<at>	Replace with @

1. Privacy Policy

1.1 Registration

In order to use our services, you must be a registered and active VATSIM member (with the exception to those detailed in the paragraph below). By logging into our services via VATSIM Single Sign-On (SSO), VATSIM provides information to HvACC in order to facilitate your usage of our services. When logging in via SSO, the information which is provided to our services is explicitly detailed and you must consent to this information being shared with us prior to logging in. Demographic information may be collected to provide targeted services and improve system security (including location, and number of visits and their duration).

Some parts of our systems are accessible without registration or authentication. Despite not being required to log in to these services with personal credentials, data regarding your visit will be logged. These include cookies (within your browser – see 1.4 below), IP addresses and other data which may result in you being identifiable. If you wish to utilise our services while retaining anonymity, this is possible by taking appropriate anonymisation measures within your browser's settings.

All users of our services are tracked using a third-party analytics service; Google Analytics. Their policies can be found [here](#) and are applicable to all visitors to our services. Users of our services should be aware that the data collected by Google may be personally identifiable.

1.2 Information Collection and Use

HvACC retains copies of any centrally held data, provided by VATSIM, to allow us to carry out subdivision activities and provide services to you. Any supplementary data is owned by HvACC and held in databases associated with this site. In order to provide you with these services, a significant portion of data may be held by other third parties; this policy is not capable of accounting for these. The data that we hold is not permitted to be sold or rented in any form without your permission. In the case that this changes, it will always be disclosed within this policy.

HvACC and VATSIM have a number of responsibilities to you with regard to the collection of your personal data:

1. HvACC has 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 Protection and Handling Policy, which details and controls how we do this.
2. HvACC has a responsibility to only collect, store, and process your data on a lawful basis. HvACC 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 VATSIM and HvACC policies. This legitimate interest constitutes a lawful basis for data collection, storage, and processing.

3. HvACC has a responsibility to ensure that data protection is managed in accord with our Data Protection and Handling Policy.
4. HvACC has a responsibility to report any data breach to the appropriate authorities.

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

1. You have the right to be informed why we collect your data. This policy explains these reasons to you.
2. You have the right to access your data and view the data collected on you. This data will be released to you on written request to support<at>hvacc.org . To protect the privacy of other individuals, certain information may be redacted, so long as this does not censor your personal data.
3. You have the right to rectify data you believe to be inaccurate. We encourage members to ensure details such as their email address is kept up to date through the VATSIM.net membership dashboard and via HvACC Services. Note: VATSIM.net data is only transmitted to HvACC services via explicit consent, obtained through SSO. As a result, the data held in HvACC services may be significantly outdated if you do not renew your login. If you believe other data held about you is incorrect, you may contact support<at>hvacc.org to have it corrected.
4. Membership of HvACC is only possible via membership of VATSIM. In order to exercise your right to erasure, you must do so via a request for your data be erased from the VATSIM systems as defined in the VATSIM privacy policy. Supplementary data which HvACC retains may be erased by contacting support<at>hvacc.org, where that data did not originate from VATSIM. For total erasure across the entire network, requests should be submitted in accordance with VATSIM's Privacy Policy.
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 HvACC Services.
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 HvACC Services.

1.3 Personal Statistical Information

In the normal course of connecting to HvACC services, certain personal statistical information will be collected. This is undertaken via the Google Analytics tool; their policies can be found [here](#).

If at any time you feel that HvACC is not following this Privacy Policy, you should contact the HvACC Staff team at support<at>hvacc.org .

1.4 Cookies

HvACC 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, HvACC has no access to or control over these cookies.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Services.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

1.5 Log Files

HvACC 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

HvACC / 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

The HvACC services contain links to other sites. Please be aware that HvACC is not responsible for the privacy practices or policies of such other sites. HvACC 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 HvACC services.

1.8 Required Subscription

It is not required to be a subscribed member of any mailing list to retain a membership of HvACC. The only compulsory emails are transactional emails necessary for the processing of the agreed services between HvACC and yourself (including changes in status of your account). We endeavour to only send you emails to which you have agreed to receive. In the event you receive unwanted emails from our services which are not compulsory, you always have the right to unsubscribe by contacting support<at>hvacc.org .

1.9 Surveys, Contests and Marketing

From time-to-time, HvACC 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 HvACC. 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 location 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

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

HvACC will make all reasonable efforts to protect member information offline. 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 Staff Members, instructors) are granted access to personally identifiable information.

The HvACC Data Protection and 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.

If you have any questions about the security of the information you submit to the HvACC services, you can send an email to support<at>hvacc.org.

1.11 Minimum Age Requirement

HvACC entrusts VATSIM to only accept members above the legal age of consent for data processing. Where a prospective member is below the minimum age, HvACC entrusts VATSIM to ensure consent from the appropriate individual has been received.

HvACC will work to ensure that everyone accessing HvACC services has provided consent for their personal data to be processed. Where there is doubt that legitimate consent has been obtained, HvACC will work with VATEUD-VATEUR-VATSIM and the member to ensure that it is obtained, and record retained of the agreement (be this from the individual themselves or a parent/guardian).

Where there is reasonable doubt that legitimate consent has been received, individuals will have access to HvACC services restricted until clarity is sought.

1.12 Notification of Changes

If HvACC 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 HvACC 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.

1.13 Contact

Questions concerning this Privacy Policy may be directed to the HvACC Staff team at support<at>hvacc.org.

1.14 Review

This policy must be reviewed by at least one member of the HvACC Lead team and at least one other HvACC Staff team member at a minimum interval of 24 months.

The next review will take place and be published prior to 31st September 2021.