

VATJPN

Privacy Policy

VERSION 1

1st August 2021

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Section 1 | Summary

1.1 Definitions

The key words “MUST”, “MUST NOT”, “REQUIRED”, “SHALL”, “SHALL NOT”, “SHOULD”, “SHOULD NOT”, “RECOMMENDED”, “MAY”, and “OPTIONAL” in this document are to be interpreted as described in RFC 2119.

VATSIM refers to the organization at <https://www.vatsim.net/>.

VATJPN refers to the organization at <https://vatjpn.org/>.

Section 2 | Policy

2.1 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 VATJPN 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 2.4 below), IP addresses and other data which may result in you being identifiable. If you wish to utilize our services while retaining anonymity, this is possible by taking appropriate anonymization measures within your browser’s settings.

2.2 Information Collection and Use

VATJPN retains copies of any centrally held data, provided by VATSIM, to allow us to carry out division activities and provide services to you. Any supplementary data is owned by VATJPN 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.

VATSIM and VATJPN has several legal responsibilities to you with regard to the collection of your personal data:

1. VATJPN has a responsibility to be accountable and transparent in how and why we collect, store and process your data (we do this via this Privacy Policy). Members with access to your data are bound by our Data Protection and Handling Policy, which details and controls how we do this.

2. VATJPN has a responsibility to only collect, store, and process your data on a lawful basis. VATJPN asserts it has a legitimate interest to do so in order to ensure the smooth functioning of the division and to ensure interactions between members and our services conform to the applicable VATSIM and VATJPN policies. The legitimate interest constitutes a lawful basis for data collection, storage, and processing. Your consent will be sought in changes to our privacy policy (this document); where this consent cannot be asserted in a timely manner, we will assume you are exercising your right to object and restrict access to our services as necessary.
3. VATJPN has a responsibility to ensure that data protection is managed in accordance with our Data Protection and Handling Policy.
4. VATJPN has a responsibility to report any data breaches to the appropriate authorities and will do so without prejudice, undue delay or hesitation.

You, as a user of VATJPN, have several rights:

1. You have the right to be informed why we collect your data. This policy explains these reasons.
2. You have a right to access your data and view the data collected about you. This data will be released to you on a written request to webmaster@vatjpn.org, providing there is no legal basis to refuse such a request. 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 a 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. Note: VATSIM.net data is only transmitted to VATJPN services via explicit consent, obtained through SSO. This can take up to 72 hours after consent to be reflected across VATJPN's services. As a result, the data held in VATJPN 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 webmaster@vatjpn.org to have it corrected.
4. Membership of VATJPN 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 to be erased from the VATSIM systems as defined in the VATSIM privacy policy. Supplementary data which VATJPN retains may be erased by contacting webmaster@vatjpn.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, we may restrict your ability to connect to our services.
6. You have the right to object to our legitimate interests (which we assert in section 2.9). While your objection is being considered, processing of your data may be frozen, and this may restrict your ability to connect to our services.

2.3 Cookies

VATJPN uses 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 system security. In addition to cookies placed by VATJPN, cookies may be created and accessed by additional services, such as Google services utilized by VATJPN.

2.4 Log Files

VATJPN uses IP addresses to analyze trends, administer its website, track user's movements, and gather broad demographic information for aggregated use. IP addresses are associated with individual users to enhance security by allowing authorized persons to inspect audit logs in the event that your account is compromised.

2.5 Sharing of Certain Information

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

Our chosen partner for handling backups is Sakura Internet. Personal data is transmitted to them and encrypted for secure storage. Sakura Internet does not have the ability to decrypt the data we store on their systems.

2.6 Links to Outside Websites

The VATJPN website contains links to other websites. Please be aware that VATJPN is not responsible for the privacy practices or policies of such sites. VATJPN encourages its visitors to be aware when they leave its website and to read the privacy statements of each website that collects personally identifiable information. This privacy statement applies solely to information collected by VATJPN and its services.

2.7 Required Subscriptions

VATJPN utilizes your email address only for the transactional emails necessary for the processing of the agreed services between VATJPN and yourself (including changes in status of your account).

2.8 Security

VATJPN takes every reasonable precaution to protect its members' information.

Certain information about members is considered to be restricted and is held in parts of our systems that are only accessible to those who have been explicitly granted access. Only those people who need the information to perform a specific job (including, but not limited to, instructors, division staff, and administrative assistants) are granted access to personally identifiable information.

The VATJPN Data Protection and Handling Policy details the circumstances and the manner under which those authorized to see and access your data may do so.

All persons with such access are required to indicate their agreement to be bound by these policies before access is granted.

If you have any questions about the security of the information you submit to VATJPN, you should send your query to webmaster@vatjpn.org.

2.9 Minimum Age Requirement

VATJPN entrusts VATSIM to only accept members above the legal age of consent for data processing.

Where a prospective member is below the minimum age, VATJPN entrusts VATSIM to ensure consent from the appropriate individual has been received.

VATJPN will work to ensure that everyone accessing VATJPN services has provided consent for their personal data to be processed. Where there is doubt that legitimate consent has been obtained, VATJPN will work with 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 VATJPN services restricted until clarity is sought.

Section 3 | Changes to This Policy

3.1 Notification of Changes

If VATJPN decides to update this Privacy Policy, notice of such changes will be made easily available for all those concerned.

If at any point VATJPN decides to change the way in which it uses personally identifiable information, then all information collected previously will be bound by the version of the Privacy Policy that was enforced at the time of collection.

We will notify those users who log in to our services of changes to this policy. Any user that has not agreed to the changes will have access to our systems suspended until their agreement is sought or they contact us to arrange an alternative arrangement.

3.2 Queries

Questions concerning this Privacy Policy should be directed to webmaster@vatjpn.org.

3.3 Review

This policy must be reviewed by at least one member of the VATJPN management team, a VATJPN Director of Web Services and at least one other VATJPN Division Staff Group member at a minimum interval of 24 months.

The next review will take place and be published prior to 1st August 2023.