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IFATCA PRIVACY POLICY

On the collection, usage, disclosure, management and disposal of personal and sensitive data

Version 1.0 – May 2024

MANUAL

IFATCA is the recognised international organisation representing air traffic controller associations. It is a non-political, not-for-profit, professional body that has been representing air traffic controllers for more than 50 years, and has more than 50,000 members in over 120 countries.

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Table of Contents

1.	Introduction	5
2.	Summary of key points	6
3.	Information collected by IFATCA	8
4.	Processing the information.....	10
5.	Legal basis for processing the information	11
6.	Conditions for sharing personal information.....	13
7.	Policy regarding third-party websites.....	14
8.	Policy on cookies and tracking	15
9.	Policy on social logins and social media.....	16
10.	International transfer of information	17
11.	Retention of data and information	18
12.	Measures to keep information safe.....	19
13.	Collecting information from minors	20
14.	Privacy rights.....	21
15.	Controls for do-not-track features.....	23
16.	United States specific privacy rights	24
17.	Regional specific privacy rights	32
18.	Updates to the policy	33
19.	Contacting IFATCA about the policy	34
20.	Management of the data collected	35
21.	References.....	36

IFATCA Privacy Policy

Last updated: 1 May 2024.

1. Introduction

- 1.1 This privacy policy for IFATCA ('we', 'us', 'our', 'the Federation'), describes how and why IFATCA might collect, store, use, and/or share ('process') information when engaging with the Federation or when using its services, visiting its website at <http://www.ifatca.org>, or any website of the Federation that links to this privacy policy, or engaging with the Federation in other related ways, including but not limited to: in writing, by email, by telephone, on social media, using online collaboration tools, during events or attending meetings ('Services').
- 1.2 Questions or concerns? Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use IFATCA's Services. If you still have any questions or concerns, please contact the IFATCA Office at office@ifatca.org.

2. Summary of key points

2.1 This summary provides key points from IFATCA’s privacy policy, but you can find out more details about any of these topics by referring to the [table of contents](#) above to find the section you are looking for.

2.2 What personal information does IFATCA process?

2.2.1 When you interact, visit, use, or navigate IFATCA’s Services, the Federation may process personal information depending on how you interact with IFATCA and its Services, the choices you make, and the products, documents, and features you use. [Learn more about personal information you disclose to IFATCA.](#)

2.3 Does IFATCA process any sensitive personal information?

2.3.1 IFATCA may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law. [Learn more about sensitive information IFATCA processes.](#)

2.4 Does IFATCA receive any information from third parties?

2.4.1 IFATCA does not receive any information from third parties, other than what is mentioned in section 7 of this policy.

2.5 How does IFATCA process your information?

2.5.1 IFATCA processes your information to provide, improve, and administer its Services, communicate with you, for security and fraud prevention, and to comply with law. IFATCA may also process your information for other purposes with your consent. IFATCA processes your information only when the Federation has a valid legal reason to do so. [Learn more about how IFATCA processes your information.](#)

2.6 In what situations and with which parties does IFATCA share personal information?

2.6.1 IFATCA may share information in specific situations and with specific third parties. [Learn more about when and with whom IFATCA shares your personal information.](#)

2.7 How does IFATCA keep your information safe?

2.7.1 IFATCA has organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so IFATCA cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat the Federation’s security and improperly collect, access, steal, or modify your information. [Learn more about how IFATCA keeps your information safe.](#)

2.8 What are your rights?

2.8.1 IFATCA is governed by Canadian law. However, depending on where you are located geographically, the applicable privacy law may mean you have certain additional rights regarding your personal information. [Learn more about your privacy rights.](#)

2.9 How do you exercise your rights?

2.9.1 The easiest way to exercise your rights is by submitting a data subject access request, or by contacting IFATCA. IFATCA will consider and act upon any request in accordance with applicable data protection laws in Canada.

2.10 Want to learn more about what IFATCA does with any information it collects?

2.10.1 Review this privacy policy in full.

3. Information collected by IFATCA

3.1 IFATCA collects personal information that you voluntarily provide to the Federation when you express an interest in obtaining information about IFATCA or its products and Services, when you participate in activities related to IFATCA or otherwise when you contact the Federation.

3.2 Personal information provided by you

3.2.1 The personal information that IFATCA collects depends on the context of your interactions with the Federation and its Services, the choices you make, and the products and features you use. The personal information IFATCA collects may include the following:

- Names;
- Phone numbers;
- Email addresses;
- Mailing addresses;
- Job titles;
- Contact preferences;
- Billing addresses;
- Banking details;
- Debit/credit card numbers; and
- Contact or authentication data.

3.3 Sensitive information

3.3.1 When necessary, with your consent or as otherwise permitted by the law, IFATCA processes the following categories of sensitive information, according to the Canadian law:

- information revealing trade union membership.

3.4 Social media and login data

3.4.1 IFATCA may provide you with the option to register with the Federation using your existing social media account details, like your Facebook, Twitter, or other social media account. IFATCA may also provide you with login details for one or many of its website(s) and online platform(s). If you choose to register in this way, IFATCA will collect the information described in Section 9 of this policy.

3.4.2 All personal information that you provide to IFATCA must be true, complete, and accurate, and you must notify the Federation of any changes to such personal information when requested.

3.5 Information automatically collected

3.5.1 Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit IFATCA Services.

3.5.2 IFATCA automatically collects certain information when you visit, use, or navigate its Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use IFATCA's Services, and other technical information. This information is primarily needed to maintain the security and operation of IFATCA's Services, and for the Federation's internal analytics and reporting purposes.

3.5.3 Like many businesses, IFATCA also collects information through cookies and similar technologies. The information collected includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information IFATCA servers automatically collect when you access or use IFATCA Services and which the Federation records in log files. Depending on how you interact with IFATCA, this log data may include your IP address, device information, browser type, and settings and information about your activity in its Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- **Device Data.** IFATCA collects device data such as information about your computer, phone, tablet, or other device you use to access its Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data.** IFATCA collects location data such as information about your device's location, which can be either precise or imprecise. How much information IFATCA collects depends on the type and settings of the device you use to access its Services. For example, IFATCA may use GPS and other technologies to collect geolocation data that tells the Federation your current location (based on your IP address). You can opt out of allowing IFATCA to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Federation's Services.

4. Processing the information

4.1 IFATCA processes your information to provide, improve, and administer the Federation, communicate with you, for security and fraud prevention, and to comply with Canadian and international laws. IFATCA may also process your information for other purposes with your consent.

4.2 IFATCA processes your personal information for a variety of reasons, depending on how you interact with the Federation, including:

- **To deliver and facilitate delivery of services to the user.** IFATCA may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** IFATCA may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** IFATCA may process your information to send you details about the Federation’s products and services, changes to the Federation’s terms and policies, and other similar information.
- **To enable user-to-user communications.** IFATCA may process your information if you choose to use any of the Federation’s offerings that allow for communication with another user.
- **To request feedback.** IFATCA may process your information when necessary to request feedback and to contact you about your use of IFATCA Services.
- **To protect our Services.** IFATCA may process your information as part of the Federation’s efforts to keep its Services safe and secure, including fraud monitoring and prevention.
- **To save or protect an individual's vital interest.** IFATCA may process your information when necessary to save or protect an individual’s vital interest, such as to prevent harm.

5. Legal basis for processing the information

5.1 IFATCA only processes personal information when the Federation believes it is necessary and has a valid legal reason (i.e. legal basis) to do so under applicable Canadian law, namely: with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil IFATCA’s legitimate business interests.

5.2 If you are located in the EU or UK, this section applies to you:

5.2.1 The General Data Protection Regulation (GDPR) and UK GDPR require IFATCA to explain the valid legal bases the Federation relies on in order to process your personal information. As such, IFATCA may rely on the following legal bases to process your personal information:

- **Consent.** IFATCA may process your information if you have given the Federation your permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** IFATCA may process your personal information when the Federation believes it is necessary to fulfil its contractual obligations to you, including providing its Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** IFATCA may process your information when the Federation believes it is reasonably necessary to achieve its legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, IFATCA may process your personal information for some of the purposes described in order to:
 - Diagnose problems and/or prevent fraudulent activities; and
 - Understand how IFATCA’s users use its documents, websites, products and services so the Federation can improve user experience.
- **Legal Obligations.** IFATCA may process your information where the Federation believes it is necessary for compliance with its legal obligations, such as to cooperate with Canadian law enforcement bodies or regulatory agencies, exercise or defend the Federation’s legal rights, or disclose your information as evidence in litigation in which IFATCA is involved.
- **Vital Interests.** IFATCA may process your information where the Federation believes it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

5.3 If you are located in Canada, or if the information is related to IFATCA’s headquarters located in Montréal, Canada, this section applies to you:

5.3.1 IFATCA may process your information if you have given the Federation specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time.

5.3.2 In some exceptional cases, IFATCA may be legally permitted under the applicable Canadian law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely manner;
- For investigations and fraud detection and prevention;
- For business transactions provided certain conditions are met;
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim;
- For identifying injured, ill, or deceased persons and communicating with next of kin;
- If IFATCA has reasonable grounds to believe an individual has been, is, or may be victim of financial abuse;
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada and/or the province of Québec;
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records;
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced;
- If the collection is solely for journalistic, artistic, or literary purposes; and
- If the information is publicly available and is specified by Canadian regulations.

6. Conditions for sharing personal information

6.1 IFATCA may share information in specific situations described in this section and/or with the following third parties.

6.2 Namely, IFATCA may need to share your personal information in the following situations:

- **Business Transfers.** IFATCA may share or transfer your information in connection with, or during negotiations of, any partnership, sale of the Federation’s assets, financial transaction, or acquisition of all or a portion of business assets from another company, business or organisation.
- **Affiliates.** IFATCA may share your information with its affiliates and partners, in which case the Federation will require those affiliates and partners to honour this privacy policy. Affiliates and partners include any subsidiaries, joint venture partners, or other entities or organisations that IFATCA controls or that are under common control with the Federation.
- **Other Users.** When you share personal information (for example, by posting comments, contributions, or other content of the Federation) or otherwise interact with public areas of the Federation, such personal information may be viewed by all users and may be publicly made available outside the Federation in perpetuity. If you interact with other users of the Federation and register for its Services through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within the Federation’s Services, online or not, and view your profile.

7. Policy regarding third-party websites

- 7.1 IFATCA is not responsible for the safety of any information that you share with third parties that the Federation may link to or who advertise on IFATCA Services, but are not affiliated with, IFATCA Services.**
- 7.2 IFATCA Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with the Federation and which may link to other websites, services, or applications.
- 7.3 Accordingly, IFATCA does not make any guarantee regarding any such third parties, and IFATCA will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications.
- 7.4 The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by IFATCA. IFATCA cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy.
- 7.5 IFATCA is not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from IFATCA's Services. You should review the policies of such third parties and contact them directly to respond to your questions.

8. Policy on cookies and tracking

- 8.1 IFATCA may use cookies and other tracking technologies to collect and store your information.**
- 8.2 IFATCA may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.
- 8.3 Specific information about how IFATCA uses such technologies and how you can refuse certain cookies is set out in IFATCA's Cookie Policy, which can be accessed here: <https://ifatca.org/cookie-policy-ca/>.

9. Policy on social logins and social media

9.1 If you choose to register or log in to IFATCA Services using a social media account, IFATCA may have access to certain information about you.

- 9.2 IFATCA Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, IFATCA will receive certain profile information about you from your social media provider. The profile information received may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.
- 9.3 IFATCA will use the information received only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the relevant IFATCA Services.
- 9.4 Please note that IFATCA does not control, and is not responsible for, other uses of your personal information by your third-party social media provider. IFATCA recommends that you review their privacy policy to understand how it collects, uses, and shares your personal information, and how you can set your privacy preferences on its sites and apps.

10. International transfer of information

10.1 IFATCA may transfer, store, and process your information in countries other than your own.

10.2 Our servers are located in Canada, but also abroad. If you are accessing IFATCA Services from outside Canada, please be aware that your information may be transferred to, stored, and processed by the Federation in its facilities in Canada, and by those third parties with whom the Federation may share your personal information in Canada and other countries.

10.3 If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws that are identical to those in Canada, or to those in your country. However, IFATCA will take all necessary measures to protect your personal information in accordance with this privacy policy and applicable Canadian law.

10.4 European Commission's Standard Contractual Clauses

10.5 The measures implemented by IFATCA to protect your personal information, as required by Canadian law, meet the European Commission's standards for data protection, including those specified in the European Commission's Standard Contractual Clauses for transfers of personal information between the Federation and between it and our third-party providers.

10.6 These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations.

10.7 IFATCA has implemented similar appropriate safeguards with its third-party service providers and partners and further details can be provided upon request.

10.8 Binding Corporate Rules

10.9 IFATCA's set of Binding Corporate Rules ('BCRs') established and implemented by the Federation and contained in this policy meet the standards established by EEA and UK data protection authorities as providing an adequate level of protection to the personal information IFATCA processes internationally.

11. Retention of data and information

11.1 IFATCA keeps your information for as long as necessary to fulfil the purposes outlined in this privacy policy, unless otherwise required by Canadian law.

11.2 IFATCA will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by Canadian law (such as tax, accounting, or other legal requirements).

11.3 When IFATCA has no ongoing legitimate business need to process your personal information, the Federation will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then IFATCA will securely store your personal information and isolate it from any further processing until deletion is possible.

12. Measures to keep information safe

- 12.1 IFATCA aims to protect your personal information through a system of organisational and technical security measures.**
- 12.2 IFATCA has implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information it processes.
- 12.3 However, despite these safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so IFATCA cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat the Federation's security and improperly collect, access, steal, or modify your information.
- 12.4 Although IFATCA will do its best to protect your personal information, transmission of personal information to and from IFATCA Services is at your own risk. You should only access IFATCA Services within a secure environment.

13. Collecting information from minors

- 13.1 IFATCA does not knowingly collect data from or market to children under 18 years of age.**
- 13.2 IFATCA does not knowingly solicit data from or market to children under 18 years of age. By using IFATCA Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of IFATCA's Services.
- 13.3 If IFATCA learns that personal information from users less than 18 years of age has been collected, the Federation will deactivate the account and take reasonable measures to promptly delete such data from our records.
- 13.4 If you become aware of any data IFATCA may have collected from children under age 18, please contact the Federation at office@ifatca.org.

14. Privacy rights

14.1 In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

14.2 In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right to:

- request access and obtain a copy of your personal information;
- request rectification or erasure;
- restrict the processing of your personal information;
- if applicable, the right to data portability; and
- not to be subject to automated decision-making.

14.3 In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting IFATCA, using the contact details provided in Section 19 of this policy. IFATCA will consider and act upon any request in accordance with applicable data protection laws.

14.4 If you are located in the EEA or UK and you believe IFATCA is unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

14.5 If you are located in Switzerland, you may contact the [Federal Data Protection and Information Commissioner](#).

14.6 Withdrawing your consent

14.6.1 If IFATCA was relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting the Federation by using the contact details provided in the Section 19 of this policy.

14.6.2 However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

14.7 Cookies and similar technologies

14.7.1 Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or functions of IFATCA Services.

14.7.2 You may also opt out of interest-based advertising, emails and other mass publications, by advertisers on IFATCA Services, by the IFATCA Executive Board, or by any of its representatives.

14.8 If you have questions or comments about your privacy rights, email us at office@ifatca.org.

15. Controls for do-not-track features

- 15.1 Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected.
- 15.2 At the time of writing this policy (2024), no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, IFATCA does not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.
- 15.3 If a standard for online tracking is adopted that IFATCA must follow in the future, the Federation will inform you about that practice in a revised version of this privacy policy.

16. United States specific privacy rights

16.1 If you are a resident of California, Colorado, Connecticut, Utah or Virginia, you are granted specific rights regarding access to your personal information.

16.2 What categories of personal information does IFATCA collect?

16.2.1 IFATCA has collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	YES
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO
L. Sensitive personal Information	Account login information, citizenship or immigration status, contents of email or text messages, passport numbers and union membership	YES

16.3 IFATCA will use and retain the collected personal information as needed to provide its Services or for:

- Category A - As long as the user has an account with IFATCA;
- Category B – As long as the user has an account with IFATCA;
- Category I - As long as the user has an account with IFATCA;
- Category J - As long as the user has an account with IFATCA; and
- Category L - As long as the user has an account with IFATCA.

16.4 Category L information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You have the right to limit the use or disclosure of your sensitive personal information.

16.5 IFATCA may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our support channels;
- Participation in surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

16.6 How does IFATCA use and share your personal information?

16.6.1 Learn about how IFATCA uses your personal information in Section 4 of this policy.

16.7 Will your information be shared with anyone else?

16.7.1 IFATCA may disclose your personal information with our service providers pursuant to a written contract between the Federation and each service provider. Learn more about how IFATCA discloses personal information to in Section 6 of this policy.

16.7.2 IFATCA may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be 'selling' of your personal information.

16.7.3 IFATCA has not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. IFATCA will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

16.8 California Residents

16.8.1 California Civil Code Section 1798.83, also known as the 'Shine The Light' law permits IFATCA users who are California residents to request and obtain from the Federation, once a year and free of charge, information about categories of personal information (if any) IFATCA disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which IFATCA shared personal information in the immediately preceding calendar year.

16.8.2 If you are a California resident and would like to make such a request, please submit your request in writing to IFATCA at office@ifatca.org.

16.8.3 If you are under 18 years of age, reside in California, and have a registered account with IFATCA Services, you have the right to request removal of unwanted data that you publicly post on IFATCA Services. To request removal of such data, please contact the Federation at office@ifatca.org and include the email address associated with your account and a statement that you reside in California. IFATCA will make sure the data is not publicly displayed on its Services, but please be aware that the data may not be completely or comprehensively removed from all IFATCA systems (e.g. backups, etc.).

16.8.4 CCPA Privacy Notice

16.8.4.1 This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.

16.8.4.2 The California Code of Regulations defines a 'resident' as:

(1) every individual who is in the State of California for other than a temporary or transitory purpose; and

(2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

16.8.4.3 All other individuals are defined as 'non-residents'.

16.8.4.4 If this definition of 'resident' applies to you, IFATCA must adhere to certain rights and obligations regarding your personal information.

16.8.5 Your rights with respect to your personal data

16.8.5.1 *Right to request deletion of the data — Request to delete*

You can ask for the deletion of your personal information. If you ask IFATCA to delete your personal information, IFATCA will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, IFATCA's compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

16.8.5.2 Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

- whether IFATCA collects and use your personal information;
- the categories of personal information that IFATCA collects;
- the purposes for which the collected personal information is used;
- whether IFATCA sells or share personal information to third parties;
- the categories of personal information that IFATCA sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information IFATCA collected about you.

In accordance with applicable law, IFATCA is not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

16.8.5.3 Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

IFATCA will not discriminate against you if you exercise your privacy rights.

16.8.5.4 Right to Limit Use and Disclosure of Sensitive Personal Information

If IFATCA collects any of the following:

- social security information, drivers' licenses, state ID cards, passport numbers;
- account login information;
- credit card numbers, financial account information, or credentials allowing access to such accounts;
- precise geolocation;
- racial or ethnic origin, religious or philosophical beliefs, union membership;
- the contents of email and text, unless IFATCA is the intended recipient of the communication;
- genetic data, biometric data, and health data; and
- data concerning sexual orientation and sex life.

you have the right to direct IFATCA to limit its use of your sensitive personal information to that use which is necessary to perform IFATCA Services.

Once IFATCA receives your request, the Federation is no longer allowed to use or disclose your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

Please note that sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not covered by this right, as well as the publicly available information.

To exercise your right to limit use and disclosure of sensitive personal information, please email office@ifatca.org or submit a data subject access request.

16.8.5.5 Verification process

Upon receiving your request, IFATCA will need to verify your identity to determine you are the same person the Federation has in its system. These verification efforts require IFATCA to ask you to provide information so that it can match it with information you have previously provided us. For instance, depending on the type of request you submit, IFATCA may ask you to provide certain information so that the Federation can match the information you provide with the information already on file, or IFATCA may contact you through a communication method (e.g. phone or email) that you have previously provided the Federation. IFATCA may also use other verification methods as the circumstances dictate.

IFATCA will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, IFATCA will avoid requesting additional information from you for the purposes of verification. However, if IFATCA cannot verify your identity from the information already maintained by the Federation, IFATCA may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. IFATCA will delete such additionally provided information as soon as your identity is verified.

16.8.5.6 Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorised agent to make a request under the CCPA on your behalf. IFATCA may deny a request from an authorised agent that does not submit proof that they have been validly authorised to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, IFATCA will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact IFATCA by submitting a data subject access request, by email at office@ifatca.org, or by referring to the contact details at the end of this document. If you have a complaint about how IFATCA handles your data, IFATCA would like to hear from you.

16.9 Colorado Residents

16.9.1 This section applies only to Colorado residents. Under the Colorado Privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, IFATCA may decline your request as permitted by law.

- Right to be informed whether or not IFATCA is processing your personal data;
- Right to access your personal data;
- Right to correct inaccuracies in your personal data;
- Right to request deletion of your personal data;
- Right to obtain a copy of the personal data you previously shared with IFATCA; and
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling').

16.9.2 To submit a request to exercise these rights described above, please email office@ifatca.org or submit a data subject access request.

16.9.3 If IFATCA declines to take action regarding your request and you wish to appeal the Federation's decision, please email us at office@ifatca.org. Within forty-five (45) days of receipt of an appeal, IFATCA will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

16.10 Connecticut Residents

16.10.1 This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, IFATCA may decline your request as permitted by law.

- Right to be informed whether or not IFATCA is processing your personal data;
- Right to access your personal data;
- Right to correct inaccuracies in your personal data;
- Right to request deletion of your personal data;
- Right to obtain a copy of the personal data you previously shared with IFATCA; and
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling').

16.10.2 To submit a request to exercise these rights described above, please email office@ifatca.org or submit a data subject access request.

16.10.3 If IFATCA declines to take action regarding your request and you wish to appeal the Federation's decision, please email us at office@ifatca.org. Within sixty (60) days of receipt of an appeal, IFATCA will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

16.11 Utah Residents

16.11.1 This section applies only to Utah residents. Under the Utah Consumer Privacy Act (UCPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, IFATCA may decline your request as permitted by law.

- Right to be informed whether or not IFATCA is processing your personal data;
- Right to access your personal data;
- Right to request deletion of your personal data;
- Right to obtain a copy of the personal data you previously shared with IFATCA; and
- Right to opt out of the processing of your personal data if it is used for targeted advertising or the sale of personal data.

16.11.2 To submit a request to exercise these rights described above, please email office@ifatca.org or submit a data subject access request.

16.12 Virginia Residents

16.12.1 Under the Virginia Consumer Data Protection Act (VCDPA):

16.12.2 'Consumer' means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

16.12.3 'Personal data' means any information that is linked or reasonably linkable to an identified or identifiable natural person. 'Personal data' does not include de-identified data or publicly available information.

16.12.4 'Sale of personal data' means the exchange of personal data for monetary consideration.

16.12.5 If this definition of 'consumer' applies to you, IFATCA must adhere to certain rights and obligations regarding your personal data.

16.12.6 Your rights with respect to your personal data:

- Right to be informed whether or not IFATCA is processing your personal data;
- Right to access your personal data;
- Right to correct inaccuracies in your personal data;
- Right to request deletion of your personal data;
- Right to obtain a copy of the personal data you previously shared with IFATCA; and
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling').

16.12.7 Exercise your rights provided under the Virginia VCDPA

- 16.12.7.1 You may contact us by email at office@ifatca.org or submit a data subject access request.
- 16.12.7.2 If you are using an authorised agent to exercise your rights, IFATCA may deny a request if the authorised agent does not submit proof that they have been validly authorised to act on your behalf.

16.12.8 Verification process

- 16.12.8.1 IFATCA may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorised agent, IFATCA may need to collect additional information to verify your identity before processing your request.
- 16.12.8.2 Upon receiving your request, IFATCA will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. IFATCA will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

16.12.9 Right to appeal

- 16.12.9.1 If IFATCA declines to take action regarding your request, the Federation will inform you of our decision and reasoning behind it. If you wish to appeal IFATCA's decision, please email the Federation at office@ifatca.org. Within sixty (60) days of receipt of an appeal, IFATCA will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the [Attorney General to submit a complaint](#).

17. Regional specific privacy rights

17.1 You may have additional rights based on the country you reside in.

17.2 Australia and New Zealand

17.2.1 IFATCA collects and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

17.2.2 This privacy policy satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information IFATCA collects from you, from which sources, for which purposes, and other recipients of your personal information.

17.2.3 If you do not wish to provide the personal information necessary to fulfil their applicable purpose, it may affect IFATCA's ability to provide its Services, in particular:

- offer you the products or services that you want; and
- respond to or help with your requests.

17.2.4 At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting IFATCA at office@ifatca.org.

17.2.5 If you believe IFATCA is unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the [Office of the Australian Information Commissioner](#) and a breach of New Zealand's Privacy Principles to the [Office of New Zealand Privacy Commissioner](#).

17.3 Republic of South Africa

17.3.1 At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting IFATCA at office@ifatca.org.

17.3.2 If you are unsatisfied with the manner in which IFATCA addresses any complaint with regard to the Federation's processing of personal information, you can contact the office of the regulator, the details of which are:

[The Information Regulator \(South Africa\)](#)

General enquiries: enquiries@inforegulator.org.za

Complaints (complete POPIA/PAIA form 5):

PAIAComplaints@inforegulator.org.za & POPIAComplaints@inforegulator.org.za

18. Updates to the policy

- 18.1 IFATCA will update this policy as necessary to stay compliant with relevant laws.**
- 18.2 IFATCA may update this privacy policy from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible.
- 18.3 If IFATCA makes material changes to this privacy policy, the Federation may notify you either by prominently posting a notice of such changes or by directly sending you a notification.
- 18.4 IFATCA encourages you to review this privacy policy frequently to be informed of how the Federation is protecting your information.

19. Contacting IFATCA about the policy

- 19.1 If you have questions or comments about this policy, you may contact IFATCA's Office by email at office@ifatca.org, or contact us by post at:

IFATCA
360 St. Jacques, Suite 2002
Montréal, Québec H2Y 1P5
Canada

20. Management of the data collected

- 20.1 You have the right to request access to the personal information IFATCA collects from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a data subject access request at office@ifatca.org.

21. References

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