



# Privacy Policy

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**FOR FLIGHT SIMULATION ONLY - NOT TO BE USED FOR REAL OPERATIONS**

# Virtual Privilege Style Privacy Policy

Effective Date: 14/03/2025

Welcome to Virtual Privilege Style. This privacy policy describes how Virtual Privilege Style collects, uses and protects the personal information of its users. By using our website (<https://virtualprivilege.es/>), you agree to the terms described in this policy.

## 1. Information Collected:

- Basic user data: either
  - Name
  - either Surnames
  - either Birthdate
  - either Country
  - either Pilot ID
  - either Company API Key
  - either Range
  - either Discord ID
  - either Pilot profile picture (if you wish to provide it)
- Activity and performance data: either
  - Number of flights
  - either Flight hours
  - either Time zone
  - either IP
  - either Last access time
  - either ICAO ID
  - either VATSIM ID
- Account data: either
  - Password (encrypted)
  - either Account creation date and time Email verification
  - either Date and time Account update date and time
  - either Internal notes that the management team may wish to include

## 2. Collection of Information from Minors:

Virtual Privilege Style recognizes the importance of protecting the privacy of minors online. Therefore, our policy clearly states that we collect information from minors only with the express consent of their parents or legal guardians. For practical reasons, this consent cannot be requested and verified every time a user registers. That is why only users who are under 14 years of age will require the explicit consent of their parents or legal guardians. When the user's registration request arrives, the template will be sent by email and must be signed by their parents to give consent. Users over 14 years of age (inclusive) already accept and assume that they have the express consent of their parents when the privacy policy is accepted at the time of registration.

This includes the collection of basic data, such as name, pilot ID, email and any other information necessary for participation on our platform, which is more explicitly shown in point 1 of this document. In doing so, we seek to ensure that minors' participation is carried out safely and with proper supervision by responsible adults.

Additionally, we provide parents or guardians the option to review, modify or delete their children's personal information at any time. If you have any questions or concerns about information collected from minors, please do not hesitate to contact us at [info@virtualprivilege.es](mailto:info@virtualprivilege.es) so that we can address any concerns in a timely and effective manner. We are committed to protecting the privacy of minors and complying with all applicable laws and regulations regarding the collection and processing of data from minors.

### 3. Purpose of the Compilation:

The collection of information on Virtual Privilege Style is primarily intended to improve the user experience and ensure the efficient functioning of our operations. Below are the specific purposes for which we collect and use our users' personal information:

- **Personalization of User Experience:**

The information collected allows us to personalize each user's experience on our platform. We use data such as country, rank, and individual preferences to tailor content and interaction, providing a unique and relevant experience to each community member.

- **Communication and Sending of Information:**

We collect email addresses to facilitate communication with our users. This includes sending important updates, relevant news about the virtual airline, event notifications and any other information that may be of interest to the community.

- **Internal Company Operations:**

The information collected, such as pilot ID, flight hours and range, is used to efficiently manage Virtual Privilege Style's internal operations. This includes assigning roles and responsibilities, planning events, and evaluating pilot performance.

- **Continuous Improvement of Our Services:**

We analyze the information collected to obtain information about the use of our platform. This helps us identify areas for improvement, optimize website functionality, and adapt our offerings to meet the changing needs of the community.

- **Compliance with Legal Requirements:**

The collection of certain data, such as date of birth, may be necessary to comply with specific legal requirements or to ensure that users comply with Virtual Clickair's terms of service.

#### 4. Collection Process:

At Virtual Privilege Style, the collection of information is carried out carefully and transparently, using specific and secure methods to guarantee the integrity and confidentiality of our users' data. Below are the key processes by which information is collected:

- **Registration through the Online Form:**

Basic user information such as first name, last name, pilot ID, email, country, and other data is collected through an online registration form. This process is essential to create a personalized account and allow active participation in the virtual community.

- **Automatic Activity Registration with vmsACARS:**

To accurately track flight hours and simulation-related activity, we use vmsACARS. This system automatically records data such as the number of flights, flight hours, time zone, IP and last access time. It is important to note that the Management Team does not have direct access to this data unless it is necessary to address specific queries.

- **Data Storage Security:**

The information collected is stored securely in several locations, including the website, an internal Management Team spreadsheet, and a MySQL database. Access to this information requires a password to access the control panel, and sensitive data, such as passwords, is stored in an encrypted manner, ensuring an additional layer of security.

- **Periodic Updates and Verifications:**

User information, such as the date and time of account creation, email verification, and account update, is recorded and updated regularly to maintain the accuracy and relevance of the stored data.

This collection process is carried out with a commitment to respecting the privacy and security of our users. Virtual Privilege Style is dedicated to ensuring that personal information is handled with the highest level of care and compliance with best practices in data security.

## 5. Storage and Security:

The security and integrity of our users' personal information is of utmost importance to Virtual Privilege Style. Below we detail how we store and protect the data collected:

- **Secure Storage:**

Personal information collected is stored in multiple secure locations to ensure data redundancy and integrity. These places include the website, an internal spreadsheet of the Management Team and a MySQL database associated with the website. This diversified storage approach contributes to continuous data availability and facilitates efficient information management.

- **Password Access:**

Access to stored information requires specific credentials and a password to enter the corresponding control panel. This helps ensure that only authorized Management Team personnel have access to information necessary to carry out their assigned functions. Passwords are managed securely and stored using strong encryption methods.

- **Sensitive Data Encryption:**

Sensitive data, such as user passwords, is stored using advanced encryption techniques. This means that even in the unlikely event of a security breach, sensitive information remains protected and is not accessible in its original form.

- **Periodic Security Updates:**

We implement regularly updated security measures to align with industry best security practices. This includes applying security patches, constantly monitoring for potential vulnerabilities, and adopting new security technologies and processes as cyber threats evolve.

Data security is an ongoing priority for Virtual Privilege Style, and we are committed to continuing to strengthen and improve our security practices to ensure the continued protection of our users' confidential information.

## 6. Share Information:

At Virtual Privilege Style, we recognize the importance of transparency regarding the sharing of personal information. Below we describe how we manage and share certain data in order to foster a complete and transparent community experience:

- **Accessible Information for the Community:**

Some basic user data, such as callsign, name, last initial, airline, country, airport where the pilot is located, number of flights and flight hours, are accessible to anyone who visits the website, whether they are or not logged in. This information contributes to transparency and positive interaction within the Virtual Privilege Style community.

- **Limitation of Data Sharing:**

It is important to note that only basic data is shared and no sensitive data or information that could compromise the security or privacy of users is shared. The information shared is limited to details that are relevant to active participation in the virtual airline.

- **Public Access and User Privacy:**

Users have the option to display or not display certain details on their profiles, such as country and avatar. This provides additional control over privacy and allows each user to manage the visibility of their information within the community.

- **Do Not Share Sensitive Personal Information:**

More sensitive data, such as the company's API key, Discord ID, and private Discord channel, are not shared publicly and are protected to ensure user privacy and security.

This information sharing approach is designed to balance transparency with individual privacy. Virtual Privilege Style is committed to safeguarding personal information and ensuring that any sharing of data contributes positively to the user experience within the virtual community.

## 7. Cookies and Similar Technologies:

At Virtual Privilege Style, we strive to provide a seamless and personalized online experience for our users. Although we do not use advertising on our website, cookies and similar technologies are still valuable in improving site functionality and performance. Below we explain how we use these technologies and how users can manage their preferences:

- **Use of Cookies:**

We use cookies, which are small text files stored on the user's device, to improve the browsing experience and personalize content. These cookies may include session cookies, which are temporary and are deleted when you close the browser, as well as persistent cookies, which remain on the device for a longer period.

- **Purpose of Cookies:**

Cookies allow us to remember users' preferences and settings, such as preferred language and display options. Additionally, we use cookies to collect information about how users interact with our website, which helps us make continuous improvements to functionality and design.

- **Preference Management:**

Users have the option to manage their cookie preferences. Through the browser settings, it is possible to accept, reject or delete cookies. However, it is important to note that disabling cookies may affect the functionality and user experience on our website.

- **Third Party Cookies:**

Although we do not use advertising, some third parties, such as analytics service providers, may use cookies on our website to collect information about user performance and interaction. These third-party cookies are subject to the privacy policies of those providers.

- **Preferences Updates:**

We will inform users about the use of cookies through notifications on the website and provide clear information on how to manage and update their cookie preferences.

Although we do not use ads, we continue to use cookies and similar technologies to improve user experience and ensure the effective functioning of our website. We are committed to informing and allowing users to manage their cookie preferences transparently.

## 8. User Rights:

At Virtual Privilege Style, we recognize and respect the rights of our users regarding privacy and the management of their personal data. Below, we detail the fundamental rights that users have and how they can exercise them:

- **Access, Update and Deletion of Information:**

Users have the right to access the personal information we store, as well as update or correct any inaccurate data. Additionally, they may request deletion of their personal information, subject to any legal or contractual requirements that we must comply with.

- **Right to Hide Data:**

Virtual Clickair respects users' right to hide certain information, such as avatar and country, based on their privacy preferences. This control allows users to customize the visibility of their information in the community.

- **Right to Data Portability:**

Users have the right to receive a copy of their personal data in a structured, machine-readable format, and to transmit this data to another data controller, as technically feasible.

- **Right to File a Claim:**

In case of concerns or disagreements regarding the handling of personal data, users have the right to file a complaint with the competent supervisory authority. Virtual Privilege Style is committed to responding in a timely and collaborative manner to any concerns raised.

- **Withdrawal of Consent:**

Users have the right to withdraw their consent at any time, when this is the legal basis for the processing of their data. This will not affect the lawfulness of processing based on consent before its withdrawal.

- **Confidentiality and Privacy:**

Virtual Privilege Style ensures that users' personal information is handled confidentially and securely. Sensitive data and individual privacy are fundamental priorities in our data handling practices.

Users can exercise their rights mentioned above or make any privacy-related queries by sending an email to [info@virtualprivilege.es](mailto:info@virtualprivilege.es). This email must include identifying information such as first name, last name, email, and airline ID to ensure proper verification of the user's identity. The user has the right to obtain a response within 15 days, and to have their information provided within 30 days from the moment of the request.

## 9. Notification of Changes in the Privacy Policy:

At Virtual Privilege Style, we value transparency and open communication with our users. We understand the importance of informing the community of any changes to our privacy policy. Below we explain how we notify and manage updates to our policy:

- **Direct Communication to Pilots:**

Any changes to our privacy policy are communicated directly to all our pilots. This is done by sending detailed emails that highlight the specific changes made to the policy and how they affect users.

- **Announcement in the Virtual Airline Discord:**

In addition to email communication, we made a public announcement on the Virtual Privilege Style Discord server. This announcement includes a summary of the privacy policy changes and provides pilots with a space to ask questions or clarify.

- **Notification Clause in the Policy itself:**

The privacy policy is reviewed periodically, and any changes are reflected in the document. We include a clause that notifies users that the policy has been updated and they are encouraged to review the changes to understand how they affect their rights and privacy.

- **Active User Participation:**

We encourage active user participation by providing a channel for comments and questions regarding policy changes. This feedback is valuable to us as it allows us to address specific concerns and continually improve our privacy practices.

- **Respect for Individual Privacy:**

We understand that users may have concerns or questions about changes to the privacy policy. We are committed to addressing these concerns respectfully and working collaboratively with the community to ensure a complete understanding of the updates. This information can be consulted by email at [info@virtualprivilege.es](mailto:info@virtualprivilege.es). This email must include identifying information such as first name, last name, email, and airline ID to ensure proper verification of the user's identity. The user has the right to obtain a response within 15 days, and to have their information provided within 30 days from the moment of the request.

At Virtual Privilege Style, our priority is to keep our users informed and make sure they understand any changes to our privacy practices. We believe in transparency and providing pilots with the tools necessary to make informed decisions about their participation in our virtual airline.

## 10. Data Protection Delegates:

At Virtual Privilege Style, we attach great importance to the data protection and privacy of our users. To ensure compliance with privacy laws and facilitate communication regarding these issues, we appoint Data Protection Officers (DPOs). Below is the role and contact of our DPOs:

- **Functions of Data Protection delegates:**

Our DPO, Sofián García, plays a key role in supervising and advising on all matters related to data protection. He collaborates with the Management Team to ensure that Virtual Privilege Style's practices comply with applicable regulations and the highest privacy standards.

- **Contact by email**

Users can contact our DPOs by sending an email to the address [virtualprivilegestyle.es](mailto:virtualprivilegestyle.es). This channel is dedicated to queries related to privacy and data protection. By providing detailed information in the email, such as first name, last name, email, and airline ID, users make it easy to verify their identity and ensure an effective response to their questions or concerns.

- **Commitment to Confidentiality:**

Virtual Privilege Style guarantees the confidentiality of any communication with our DPOs. Any information provided in the contact process is handled securely and is only shared as set out in our privacy policy.

- **Coordination with Users and the Control Authority:**

Data Protection Officers are available to coordinate with users regarding their privacy rights and also to collaborate with the competent supervisory authority in the event of complaints or investigations.

At Virtual Privilege Style, we strive to establish an open and effective line of communication with our Data Protection Officers, ensuring that users can get clear answers and advice on all data protection and privacy issues.