



Privacy Policy

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The inspiration of Hong Kong

Privacy Policy for CX Virtual

Version: 2.0

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Website: cxvirtual.hk

CX Virtual (“**CX Virtual**”, “we”, “us”, or “our”) is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, process, disclose, and safeguard your information when you use cxvirtual.hk and its sub-domains, including the CX City pilot portal at cxcity.cxvirtual.hk, the CX Tracker desktop application, and our automated flight review.

This Policy is written to meet the European Union (EU) and United Kingdom (UK) General Data Protection Regulation (GDPR) and the Hong Kong Personal Data (Privacy) Ordinance (PDPO).

1. Data Controller

For the purposes of the GDPR, **CX Virtual** operates as the **Data Controller** for all personal data collected and processed through the services described above. We are responsible for ensuring that your data is processed transparently, securely, and lawfully.

2. Age Eligibility

CX Virtual enforces a minimum age to protect younger users and comply with international data protection laws:

- **Minimum Age:** You must be at least 16 years old to join **CX Virtual**. We do not accept memberships from, nor allow participation by, anyone under the age of 16.
- **Age Confirmation:** When you register, you confirm that you are 16 or older.
- **Under-age Accounts:** If we learn that a member is under 16, we will close the account and delete its personal data.
- **False Representation:** Any account created under false pretenses regarding age will be terminated upon verification.

3. Information We Collect

We collect information directly from you, automatically through your use of our services, and via integration with third-party virtual aviation networks.

A. Personal Data Provided Directly by You

- **Registration & Account Information:** Full name, email address, assigned **CX Virtual** ID number, display name/callsign, and secure cryptographic password hash.
- **Profile Details:** Country and time zone, your profile picture if you upload one, and your choice about receiving news emails.

- **Network & Linked Accounts:** Virtual network identifiers (VATSIM CID and IVAO VID), your SimBrief pilot ID, and your Discord account ID if you link Discord. If you sign in with Discord, VATSIM, or IVAO, we also store the sign-in tokens they issue.
- **Application Details:** Your answers to the entry quiz and any extra registration questions.
- **Staff Notes:** Notes that staff record about your membership.
- **Surveys, Contests, & Support:** Contact details or demographic feedback submitted voluntarily through support tickets, user surveys, or community contests.

B. Flight Data & Personal Statistical Information

- **Flight Tracking (ACARS):** While you track a flight with CX Tracker or another supported ACARS client, we receive your aircraft's position, altitude, heading, and speeds about every 10 seconds from the gate until you park, plus flight events such as engine start, take-off, landing rate, fuel, and weights. We also receive the aircraft name your simulator reports, which often includes the livery, and any notes you add to your report.
- **Flight Reports:** The route, flight level, fuel, landing rate, and notes you submit with each flight report. For a manual report, this includes the link to your flight log and your reason for filing manually.
- **Public Roster Data:** In the normal course of operating **CX Virtual**, statistical flight information, callsigns, ranks, and flight hours are logged and displayed on our roster, as described in Section 7.

C. Technical & Automated Collection

- **Technical Logs:** Internet Protocol (IP) addresses, browser type, operating system, time zone settings, referring URLs, and access timestamps.
- **Sign-in IP Address:** The IP address you last signed in from, stored on your account for security.
- **App Update Checks:** When CX Tracker checks for updates, it sends your operating system type, processor type, and app version.
- **Cookies:** Identifiers stored on your device to keep you signed in and keep your session secure. See Section 11.

4. Legal Bases for Processing (GDPR Article 6)

Under the GDPR, **CX Virtual** relies on the following lawful bases to collect and process your personal data:

Legal Basis	Purpose / Activity
Performance of a Contract (Art. 6(1)(b))	Creating and managing your membership; issuing CX Virtual IDs; logging flight hours; managing pilot rank advancements; maintaining user rosters.

Legal Basis	Purpose / Activity
Legitimate Interests (Art. 6(1)(f))	Maintaining network stability; ensuring user behavior complies with the CX Virtual User Agreement and Code of Conduct; checking flight reports against our operating rules, including automated checks; preventing fraud/multi-accounting; enforcing security.
Consent (Art. 6(1)(a))	News and announcement emails you opt in to; voluntary participation in surveys, marketing initiatives, or contests.
Legal Obligation (Art. 6(1)(c))	Complying with law enforcement requests or applicable regulatory requirements.

5. How We Use Your Data

CX Virtual processes your personal data exclusively for the following operational reasons:

1. **Virtual Airline Management:** Processing applications, assigning callsigns, maintaining active flight logs, and issuing virtual promotions.
2. **Community & Public Display:** Displaying flight maps, statistical flight history, and pilot status across cxvirtual.hk.
3. **Network Integrity & Security:** Utilizing IP logging and account verification to enforce our User Agreement and prevent network abuse.
4. **Member Communication:** Sending administrative updates, system announcements, or responding to support enquiries sent to our staff by email, our Discord server and/or other official communication platforms.
5. **Flight Review:** We check each flight report against our operating rules with automated tools. Reports that pass every check may be approved automatically. A report is only ever rejected by a member of staff, and you can ask staff to review any decision.
6. **Discord Status:** If you run Discord while tracking, CX Tracker shows your callsign, route, and flight progress on your Discord profile. You can turn this off in CX Tracker's settings.

6. Data Access Control and Internal Safeguards

CX Virtual treats your personal data with strict confidentiality. We do **not** sell, rent, or trade your personal information to third parties.

- **Internal Access Controls:** Access to personally identifiable data is strictly restricted to authorized staff members (e.g., Administrators, Membership Staff, Operations Staff) who require access to perform specific administrative duties.
- **Policy Compliance:** All authorized staff are bound by our internal Data Protection and Handling Policy.

- **Data Breach Notification:** In the event of a security breach compromising your personal data, **CX Virtual** will notify relevant regulatory authorities and affected users in accordance with applicable GDPR obligations.

7. Sharing and Third-Party Disclosures

We share data only in the following scenarios:

- **Public, Without Signing In:** Flights in progress on our live map, with the pilot's ID, first name and last initial, rank, and flight hours, and the flight number, route, aircraft, and position; the flown track of a flight; and the first name and last initial of news authors.
- **Members Only:** Signed-in members can see other members' first name and last initial, pilot ID, rank, flight hours, flight history, and live position. Staff can also see email addresses.
- **Virtual Aviation Networks:** We may cross-reference identifiers with VATSIM or IVAO to verify membership validity.
- **Service Providers:** The providers below process data to run our services:

Provider	Purpose	Data Received
Cloudflare	Hosting and security for our website and CX City	All traffic to our sites, including IP addresses
Discord	Community announcements and staff alerts	Flight and award announcements with your pilot ID, first name and last initial, and a Discord mention if you linked Discord; direct messages to linked members; server error reports to a staff-only channel
Discord (desktop app)	Flight status on your Discord profile while tracking	Your callsign, route, and flight progress, passed to your own Discord app. Can be turned off in CX Tracker.
Discord, VATSIM, and IVAO	Optional sign-in and membership checks	Your account ID with them
SimBrief	Flight planning	Your full name and SimBrief ID when you plan a flight
Email provider	Account and news emails	Your name and email address
Gravatar	Profile picture when you have not uploaded one	A one-way hash of your email address
DiceBear	Placeholder profile pictures in CX City	Your initials

Provider	Purpose	Data Received
OpenFreeMap	Maps on our website, CX City, and CX Tracker	Your IP address and the map area being viewed
Google Fonts and unpkg	Page fonts and the map library	Your IP address and browser details
GitHub	Runs our automated flight review	Pending flight reports with the pilot's ID, first name and last initial, and linked network IDs. No email addresses. Results are kept for up to 90 days.

- **External Links:** Our site contains links to external websites. **CX Virtual** is not responsible for the privacy practices of external entities.

8. International Data Transfers

Our hosting and many of the service providers listed in Section 7 are located outside the European Economic Area (EEA), mostly in the United States. Whenever personal data is transferred out of the EEA, **CX Virtual** relies on adequacy decisions or on the European Commission-approved Standard Contractual Clauses (SCCs) included in a provider's data processing terms.

9. Data Retention & Erasure

Your flight reports, flight tracks, and support tickets are kept for as long as **CX Virtual** operates, because your flight history, hours, and rank are the core of your membership and our public roster. If you close your account, we remove your contact and account details but keep your flight history under your pilot ID. If you ask us to erase your data, we delete your flight history as well.

Server logs are kept for 3 days unless needed for an active security investigation. Records of changes to your account are kept for 60 days. The IP address you last signed in from is kept on your account and removed when your account is closed.

The table below lists how long each kind of data is kept:

Data	Retention
Flight reports, flight tracks, and ACARS data	Indefinitely. Deleted on an erasure request.
Support tickets	Indefinitely. Deleted on an erasure request.
Account and contact details	While your account exists. Removed when it is closed.
Last sign-in IP address	Kept on your account and replaced at each sign-in. Removed when your account is closed.

Data	Retention
Server logs	3 days
Records of changes to your account	60 days
Cancelled flight reports	12 hours
Flights abandoned during tracking	2 hours after the last update
Automated flight review reports	Up to 90 days
CX Tracker files on your computer	Flight backups are deleted when the flight is filed or cancelled, or when you start a new flight. The app log is cleared at start-up once it passes 40 KB. Your sign-in is kept until you sign out.

10. Your Data Protection Rights under GDPR

Under the GDPR, you hold specific rights regarding your personal data:

1. **Right to be Informed:** You have the right to transparent information regarding how your data is collected and used (as set forth in this policy).
2. **Right of Access:** You may submit a written request to access the personal data **CX Virtual** holds about you. (Note: Internal security staff names or sensitive system security logs may be redacted to protect operational security.)
3. **Right to Rectification:** You have the right to correct inaccurate data. You may update your profile details in CX City or submit a support ticket to the Membership Department.
4. **Right to Erasure (“Right to be Forgotten”):** You can close your account at any time. We then delete your name, email, network and Discord IDs, profile picture, IP address, and sign-in tokens, and keep your flight history under your pilot ID. If you ask for erasure, we also delete your flight reports, flight tracks, comments, and support tickets. **Please note:** Erasure ends your **CX Virtual** membership and cannot be undone.
5. **Right to Restrict Processing:** You may request that we restrict processing during a dispute. This may temporarily restrict your access or ability to connect to the **CX Virtual** network.
6. **Right to Object:** You may object to data processing based on legitimate interests. Your account access may be frozen while the objection is evaluated.
7. **Right to Data Portability:** You have the right to receive your personal data in a structured, commonly used format. On request, staff will send your account details and flight history as a file within 30 days.

To exercise any of these rights, contact our team at ceo@cxvirtual.hk. We will respond within **30 days**. You also retain the right to lodge a complaint with a European data

protection supervisory authority, the UK Information Commissioner's Office (ICO), or the Office of the Privacy Commissioner for Personal Data, Hong Kong (PCPD).

11. Cookies and Similar Technologies

We only use cookies needed to sign you in and keep your session secure. We do **not** use analytics, advertising, or tracking cookies.

Cookie	Where	Purpose	Duration
sanctum.token.cookie	CX City	Keeps you signed in	Until you close the browser, or 30 days with "Keep me signed in"
cx.remember	CX City	Remembers your "Keep me signed in" choice	30 days
phpvms_session	Staff admin panel	Session	2 hours
XSRF-TOKEN	Staff admin panel	Protects forms against forgery	2 hours
remember_web_...	Staff admin panel	"Remember me" sign-in	Up to 400 days, or until you sign out

CX City and CX Tracker also store display preferences (such as map style, which news you have read, and cabin announcements) in your browser or the app. CX Tracker keeps your sign-in on your computer until you sign out.

You can manage cookies in your browser settings, though blocking essential cookies will stop you from signing in.

12. Notification of Changes

CX Virtual reserves the right to update this Privacy Policy. Changes will be posted publicly on [cxvirtual.hk](#). If we make material changes to how personally identifiable information is processed, we will notify members via email so you may choose whether to maintain or close your account.

13. Contact Information

For any questions regarding this Privacy Policy, your rights, or data security, please reach out to us:

- **Website:** cxvirtual.hk
- **Email:** ceo@cxvirtual.hk (Chief Executive Officer) / de@cxvirtual.hk (Director Engineering)