



AIR
DEFENDER
CAN YOU DEFEND OUR SKIES?

Title: ROTOR3 & “Air Defender” – Privacy Policy & Data Policy

Date: 31 JUL 26

Sponsor: [COS] Tommo (Aidan Thomas)

Version: 1.0 (AL0)

Review Period: Annually

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AMENDMENT RECORD

Date	AL State	Amended By	Paragraph of Change
31 Jul 26	AL0	[COS] Tommo	INITIAL ISSUE

PURPOSE

“Air Defender” is a working trademark of ROTOR3 Game Studio.

Air Defender (“we”, “our”, “us”) is committed to protecting your privacy and handling your personal information responsibly, transparently and in line with UK GDPR and the Data Protection Act 2018.

This Privacy Policy explains what information we collect, why we collect it, how we use it and the rights you have over your personal data.

AIM

- This policy aims to apply to all of the following:
- The Air Defender game and its licensing and activation systems
- The Air Defender website and merchandise store (airdefendergame.com)
- The Air Defender Discord server and its support tickets
- The Air Defender Bot, which records certain content from Discord onto our own systems
- The Air Defender community forums
- Bug reports and suggestions, however they reach us, including the records held on our internal staff systems
- Air Defender events, whether physical (shows, exhibitions, cadet and STEM events) or online
- Staff, moderators and volunteers working on the project.

APPLICABILITY

This document applies to all members of the community, staff, and users of the software created by Rotor3.

ANNEX A: CONTROLLING DATA WITHIN ROTOR3 – POINTS OF CONTACTS

The Data Controller

The Data Controller for Air Defender is ROTOR3 Game Studio. The individual with overall responsibility for data protection within ROTOR3 is Allan Akers, who oversees all uses of data and ensures compliance with relevant data protection laws.

Data Protection Lead

The Data Protection Lead for Air Defender is Aidan Thomas (aka [COS] Tommo). This person is responsible for overseeing day-to-day uses of data to ensure compliance with this policy, and for reporting data breaches to the Information Commissioner's Office in the UK.

How to contact us about data protection

Email: privacy@airdefender.uk

Discord: go to the Air Defender Discord server, click "Support", and open a "Contact Game Studio" ticket asking to speak to the Data Controller or the Data Protection Lead — <https://discord.gg/JQw9GcrmhE>

You do not need a Discord account to exercise your data protection rights. Email is always available.

ANNEX B: INFORMATION WE COLLECT

1. Information we Collect

We collect the following information in various ways:

1.1 – Through Discord

When you interact with our discord server or our support staff, Discord may share certain information with us, including but not limited to:

- Discord username, user ID, and tag
- Profile information (e.g. avatar), display name and nickname
- Roles assigned to you on our server
- Messages and content you send in publicly visible channels
- Direct messages sent to our support bots
- Support ticket contents, including anything you attach
- Any information voluntarily provided during support interactions
- Server join/leave logs and moderation logs

Voice channel join/leave metadata (who joined which channel and when) address, or Discord Nitro payment details. These are solely handled by Discord.

We **do not** record voice or video calls. If a briefing, meeting, or event is to be recorded, this will be announced in advance and you will be given the opportunity to leave before recording starts.

Some content you post on Discord is copied onto our own private systems by the Air Defender Bot (Surveillance Director [APP]). SECTION B.2 explains exactly what, and from where.

1.2 Through the Surveillance Director [APP] bot

The Surveillance Director [APP] bot was created internally and under strict control by the creators who are senior members of the Air Defender Staff. Additionally, the bot is hosted and managed on the same hardware infrastructure as where your data is handled but does not have permissions to read information, only write information.

The Surveillance Director bot records the following information:

- Your discord username, display name, and user ID.
- The text of messages you post in channels designed for support criteria.
- Images, Videos and misc attachments you submit when populating both support tickets, suggestions and bug reports.
- Message Metadata – Channel, timestamp, and whether the message was a reply and or any reactions to subsequent messages.
- Command Usage – which bot commands have been used, and what you supplied them (arguments).

Section 5 sets out which channels are covered, why, how long the copies are kept, and how to have them removed.

1.3 Through the website and Merchandise Store

If you purchase merchandise, use our website or subscribe to updates, we may collect:

- Your full name
- Delivery address
- Billing address
- Email address
- Phone number (if required for couriers)
- Order details and transaction history
- Payment confirmation (but not full card numbers — this is handled securely by our payment processor)

Website analytics may also collect standard technical data:

- IP address
- Browser type/version
- Device information
- Approximate location
- Pages visited and interaction data (cookies)

Analytics and other non-essential cookies are only set where you have given consent. See Section 14.

1.4 Through the Air Defender Game

To operate and improve the game, we may collect:

- Steam account details (Steam username, email, unique player IDs)
- Gameplay activity logs (progress, achievements, in-game events)
- Crash logs, bug reports, and performance information
- Any information you voluntarily submit through feedback forms or bug reporting avenues
- **Licence and activation data** — where the game is licensed to an organisation, this includes a machine identifier associated with your installation, activation and deactivation events, and periodic check-ins confirming the licence is in use. This is used only to manage the number of seats in use and to prevent unlicensed copies.

1.5 Through Air Defender Support Staff

If you request help from our support team (via Discord or email), we may collect:

- Your name or chosen alias
- Contact details (email/Discord ID)
- Details of your issue or support request
- Screenshots, logs or other information you voluntarily provide
- Internal notes made by support staff relating to the ticket
- Any measures taken to resolve the issue.

1.6 Through the Community Forums

Our community forums run on **NodeBB**, self-hosted on infrastructure we operate ourselves. The forum collects:

- **Account data** — username, email address, password (stored in hashed form), and any profile information you choose to add such as an avatar, signature, location or links
- **Content** — your topics, posts, uploads, reactions and private messages
- **Technical data** — IP addresses, browser user agent, and session and login timestamps, retained for security, spam prevention and ban enforcement
- **Cookies** — a session cookie required to keep you logged in, plus any preference cookies you set (see Section 14)
- **Linked account data** — if you sign in using your Discord account, we receive your Discord user ID, username, avatar and email address from Discord in order to create and link your forum account. We receive nothing further.

1.7 Through Bug Reports and Suggestions

Bug reports and suggestions frequently contain more personal data than people expect. Depending on what you send us, a report may include:

- Your Discord user ID and username, or your forum username, and the text of your report
- **Screenshots and video**, which may incidentally show your computer's user account name, other open applications, browser tabs, or other people
- **Log files, crash dumps and configuration files**, which commonly contain your computer's user account name, file paths, local network addresses, hardware identifiers and a list of installed software
- **System specifications** — operating system, CPU, GPU, memory and driver versions
- **License or activation information**, where the report relates to licensing
- The game build, session or server the report relates to
-

Please remove anything sensitive before you send it. We do not need your real name, home address, school, unit, workplace, or anything unrelated to the fault, and we ask you **not** to include it.

1.8 Through Air-Defender Events

Where Air Defender attends or runs an event, we may collect:

- **Attendance and sign-up information** — name, contact details, unit or organisation, role, and any accessibility or dietary requirements you tell us about
- **Photography and video** taken at the event, for promoting the project (see Section 8.2)
- **Demonstration and feedback data** — comments, scores and gameplay telemetry from public demo sessions
- **Correspondence** relating to organising your or your organisation's attendance

1.9 From Staff, Moderators, and Volunteers

If you hold a staff, moderator, developer, tester coordinator or other volunteer role, we may hold:

- **Identity and contact details** — real name (where you have provided it), Discord ID, email address and any other contact route you have given us
- **Role and access records** — your role, permissions, which systems you can access, and when access was granted and revoked
- **Agreements** — signed confidentiality agreements, role descriptions and policy acknowledgements
- **Activity records** — meeting attendance, task assignments, work logs, and administrative actions taken on our systems
- **Conduct records** — where a concern is raised about a staff member, the record of that concern and its outcome

1.10 Other data we may collect

- Security logs to protect our systems
- Consent records
- Opt-in preferences for newsletters or updates
- Competition entries or giveaway information
- Information required for fraud prevention, abuse mitigation or legal compliance
- Additional information as required if you become a moderator or staff member

ANNEX C: HOW WE USE YOUR INFORMATION

2. How we use your information

2.1 Running the Game and Discord Community

- Providing, maintaining and improving the Air Defender game
- Managing licences and activations for organisational customers
- Handling bug reports, exploits or anti-cheat investigations
- Enforcing community rules
- Providing moderation and safeguarding on our Discord server

2.2 Operating the Surveillance Director [APP] bot

- Capturing bug reports, suggestions and submissions so they can be tracked to resolution
- Making submitted content available to staff who are not on Discord at the time
- Keeping a durable record of submissions, so they are not lost if a message is edited or a channel is cleared
- Moderation, safeguarding and enforcement (see Section 5.6)

2.3 Processing Merchandise Orders

- Fulfilling and delivering merchandise orders
- Processing payments securely
- Communicating order updates and resolving delivery issues
- Managing refunds or returns

2.4 Support and Customer Service

- Responding to inquiries, tickets and technical issues
- Troubleshooting bugs and performance problems
- Maintaining support records for quality and auditing

2.5 Bug reports, Suggestions, and Development.

- Reproducing, diagnosing and fixing reported faults
- Tracking a report through to resolution and release
- Contacting you with follow-up questions or to confirm a fix
- Assessing and, where appropriate, implementing suggested features
- Identifying patterns across multiple reports

2.6 Running the Community Forums

- Creating and maintaining your forum account
- Displaying your posts to other members
- Moderating content and enforcing forum rules

- Preventing spam, abuse and ban evasion

2.7 Events and Outreach

- Organising attendance, access and logistics
- Running demonstrations and collecting feedback
- Promoting Air Defender using photography and video, where consent has been given
- Following up with organisations that have expressed interest

2.8 Staff and Volunteer Administration

- Assigning roles, permissions and access
- Coordinating tasks, meetings and workflows
- Maintaining accountability over who holds privileged access to our systems
- Administering confidentiality agreements
- Handling conduct concerns

2.9 Safety, Security, and Legal Compliance

- Detecting and preventing fraud, security threats or misuse
- Complying with UK laws and responding to lawful requests
- Protecting the integrity and fairness of the Air Defender game
- Safeguarding young people in our community and at our events

2.10 Marketing and Communications

Only if you consent:

- Email newsletters and update announcements
- Promotions, competitions, surveys

You can withdraw consent at any time. We do not send marketing to anyone we know or believe to be under 18.

3. Lawful Bases for Processing

Activity	Lawful basis
Maintaining your game account and delivering purchased products	Contract
Licence activation and seat management	Contract
Fulfilling merchandise orders	Contract
Air Defender Bot capture of submissions	Legitimate interests
Moderation, safety and abuse prevention	Legitimate interests
Security logging and fraud prevention	Legitimate interests
Running the Discord server and forums	Legitimate interests
Handling bug reports and suggestions	Legitimate interests
Staff and volunteer administration	Legitimate interests / Contract
Event organisation and attendance	Legitimate interests / Consent
Photography and video for promotion	Consent
Analytics and non-essential cookies	Consent
Marketing emails, competitions and surveys	Consent
Financial and tax record keeping	Legal obligation
Responding to lawful requests from authorities	Legal obligation
Safeguarding referrals	Legal obligation / Vital interests

Where we rely on **legitimate interests**, we have considered your rights and freedoms and are satisfied the processing is proportionate. You have the right to object — see Section 13.

Where we rely on **consent**, you can withdraw it at any time, and withdrawing it will not affect anything done before you withdrew it.

ANNEX D: OUR RELATIONSHIP WITH DISCORD

4. Our Relationship with Discord

4.1 What Discord does and what we do

Discord operates the platform. **Discord's own Privacy Policy governs your Discord account, your profile, your messages as held on Discord's systems, and everything else Discord holds about you.** It is available at <https://discord.com/privacy>. We have no control over Discord's collection or use of your data, and we cannot access, export or delete data held on Discord's systems on your behalf.

We operate a **server (guild)** on the Discord platform, and we operate the **Surveillance Director [APP] bot** within it. In that capacity we see, and in the cases described in Sections 1.1, 1.2 and 5, record some information about you. That processing is what this policy covers.

4.2 Our commitments under Discord's Developer Terms

Discord requires anyone operating an application on its platform to publish a privacy policy that accurately describes what they collect and how they use it, and that is consistent with Discord's own terms. Accordingly, we confirm that:

- We use Discord API Data **only** for the purposes described in this policy, and only as permitted by Discord's Developer Terms of Service and Developer Policy;
- We **do not sell, rent or license** Discord data, and we do not use it for advertising, profiling or behavioural marketing;
- We **do not scrape** Discord or bulk-collect member lists. Where the Bot copies content, it does so only from the defined channels listed in Section 5.2, and only for the purposes in Section 2.2;
- We do not collect or solicit Discord login credentials, tokens or payment information, and we will never ask you for them;
- We retain Discord data only for as long as needed for the purpose it was collected for, and delete it when it is no longer needed or when the Bot is removed from a server;
- We take reasonable technical and organisational measures to protect the data we hold (Section 16);
- We will notify Discord and affected users of any unauthorised access to Discord API Data, as required by Discord's Developer Terms;
- Where a member blocks the Bot, or a server administrator removes it, we respect that decision and cease the associated processing;
- **Where anything in this policy conflicts with Discord's terms, Discord's terms prevail.** Nothing here is intended to modify, override or reinterpret them.

4.3 Public by default

Please treat anything you post in a public channel on our Discord server, or in a public area of our forums, as **public**. It can be read, quoted, screenshot and repeated by other members. This

policy governs what **we** do with your data; it cannot control what other members do with something you have posted publicly.

4.4 Rights over Discord's own data

Requests about the data **Discord** holds must go to Discord, not to us. Discord's Data Protection Officer can be contacted at dpo@discord.com. Discord has appointed a UK representative for data protection matters under Article 27 of the UK GDPR.

Requests about the data **we** hold, including anything the Bot has copied onto our systems, come to us. See Section 13.

ANNEX E: THE SURVEILLANCE DIRECTOR BOT

5. The Surveillance Director bot

Please read this section. It describes the one place where content you post on Discord is copied onto systems we control, rather than staying on Discord's.

5.1 What the bot is

The Air Defender Bot is a Discord application operated by [COS] Tommo and it is present on the Air Defender Discord server and identifies itself as a bot in the member list, as required by Discord.

5.2 Where the bot captures content

The Bot copies content from the following channels [– channel IDs] only:

- bug-report – 1423093570478411806
- suggestions – 1410006465766490122
- ticket #####

Note: ##### stipulates the ticket number ranging from 0000 to 9999. This is automatically generated following a chronological order of tickets it itself generates.

The Bot does not copy content from general chat, voice channels, or private conversations between members.

5.3 What the bot copies

For each captured submission, the Bot records onto our systems:

- your **Discord username, display name and user ID**;
- the **full text** of your message;
- **any images, video, audio or other files you attach**, copied in full and stored as files on our server;
- the **channel, timestamp and message ID**, and whether the message was a reply to another;
- **reactions and follow-up replies**, where they form part of the thread of a report;
- the command used, if the submission was made through a Bot command.

5.4 Where the copies are held

Captured content is transferred to a **private staff server** operated and owned independently by [COS] Tommo. This is hosted by a third-party infrastructure provider. Text records are held in a tracking database; images, video and other attachments are held in a self-hosted file storage service on the same infrastructure.

Access is restricted to named staff. Administrative interfaces are not exposed to the public internet, and staff accounts require two-factor authentication. Additionally, the server is hardened through recommended practices by the NCSC (National Cyber Security Centre).

5.4 Why we do this rather than leaving it on Discord

Discord is not a record-keeping system. Messages can be edited or deleted, channels are cleared, and history is not reliably searchable. Copying submissions onto our own systems means a bug report is not lost between being posted and being fixed, and means staff working on a fix do not have to trawl a chat channel to find the original report and its screenshots.

5.6 Moderation and Safeguarding

Content captured by the Bot may be used for moderation and safeguarding purposes — for example, as evidence supporting a warning or ban, or where a safeguarding concern arises. Where content is unlawful, we will remove it from our systems and report it to the appropriate authority and to Discord.

5.7 What to avoid posting

Because attachments are copied in full, **do not post anything in the Bot's channels that you would not want stored outside Discord**. In particular:

- do not post images or video containing other people who have not agreed to it;
- do not post screenshots showing personal information, addresses, real names, unit details or workplace information;
- do not post anything relating to a person under 18 without the consent of a parent, guardian or responsible adult;
- redact log files and screenshots before uploading them.

5.8 Deleting your message and having copies removed

Deleting your message on Discord does not automatically delete the copy on our systems.

If you want a captured submission removed, contact us using the details at the front of this policy, or use a Discord support ticket, and tell us roughly when and where you posted it. We will locate and delete it, along with any attachments, unless we are required to retain it for a legal, safeguarding or ban-enforcement reason. We will tell you if that is the case.

You can also object to this processing entirely — see Section 13.

5.9 Retention

See the retention table at Section 12.

5.10 Discord permissions and intents

To do the above, the Bot uses only the required parameters to perform its core functions. Nothing more. Nothing less.

For example, the **Message Content** intent is a privileged intent that Discord grants only where it is necessary for an application's core function. We use it solely for the purposes described in this section, and not to build any general archive of server conversation.

ANNEX F: COMMUNITY FORUMS

6. Community Forums

6.1 Where the forum runs

The forums run on NodeBB, on the same infrastructure, owned by [COS] Tommo, operated by Rotor3 and hosted by a third-party hosting provider (see Section 10). Administering the server is handled by two authorised individuals. The hosting provider supplies the underlying infrastructure only.

6.2 Cookies and Session Data

The forum uses **strictly necessary cookies** to keep you logged in and to protect against cross-site request forgery. These do not require consent. If we enable analytics, embedded third-party content or any other non-essential cookie on the forum, we will implement a consent banner first. See Section 14.

6.3 Private Messages

Forum private messages are **not encrypted end-to-end**. Administrators with server or database access are technically capable of reading them. We do not do so as a matter of routine, and will only do so where there is a specific moderation, security, safeguarding or legal reason, and where a less intrusive option is not available.

6.4 Public Posts, deletion and anonymisation

You can request deletion of your forum account. When we action this we will:

- Remove your email address, IP records, profile information and private messages;
- **Anonymise, rather than delete, your public posts** — your account name is replaced, but the post content remains, so that conversations other members have taken part in remain intelligible.

If you need a specific post removed entirely rather than anonymised, ask us and we will consider it.

ANNEX F: BUG REPORTS AND SUGGESTIONS

7. Bug reports and Suggestions

7.1 How reports reach us

Bug reports and suggestions may be submitted through:

- dedicated channels, Bot commands or support tickets on the Air Defender Discord server (see Section 5);
- the community forums;
- in-game reporting tools;
- direct contact with support staff by email.

Reports submitted in a **public** Discord channel or forum topic are visible to other members. If your report contains anything you would rather not share publicly, use a support ticket or email instead.

7.2 What reports are held

See section 1.7.

7.3 Where reports are held

Reports arriving via the Bot are handled as described in Section 5.4. Reports arriving by other routes are recorded on the same private staff server and file storage, so that all reports can be triaged and tracked in one place.

We keep only what is needed to reproduce and resolve the issue. Where a report can usefully be anonymised, we anonymise it.

7.4 Onward transfer to the development team

Reports and suggestions are shared with ROTOR3's development team so they can be acted on. Where a fault relates to a third-party component, we may share a **redacted** version of the report with that third party, with identifying details removed wherever possible.

7.5 Suggestions and intellectual property

If you submit a suggestion or feature idea, we may implement it. We do not treat suggestions as confidential and we do not owe payment or attribution for them unless separately agreed in writing. We hold the right to determine whether we will or will not credit contributors by name, if we do, it will only be done with your consent.

ANNEX G: EVENTS

8. Events

8.1 What we collect

See Section 1.8.

8.2 Photography and Filming

Where we photograph or film at an event we will:

- display or announce notice that filming is taking place;
- honour any request not to be photographed, and remove you from images under our control on request;
- **not publish identifiable images of anyone under 18 without documented consent** from a parent, guardian, or the responsible adult from their organisation;
- avoid publishing names alongside images unless you have agreed to it.

8.3 Cadet Organisations and Youth Groups

Air Defender is used by cadet organisations including Air Training Corps squadrons and Combined Cadet Force (RAF) sections. Where we deal with a cadet organisation or other youth group:

- **we deal with the unit and its adult staff, not with individual cadets**, wherever possible;
- we ask the unit to obtain any parental consents required under its own safeguarding policy;
- we collect the minimum needed — normally a staff contact and a headcount, not a list of cadet names;
- we do not knowingly hold personal data about individual cadets. If a unit sends us a list containing cadet details, we will confirm whether we actually need it, and securely delete it if we do not.

8.4 Third-party venues

At events hosted by others — RAF stations, airshow organisers, schools, exhibition venues — the venue or organiser will have its own privacy notice, its own registration process and its own filming arrangements. We are not responsible for their processing, and you should refer to their notices.

ANNEX H: STAFF, MODERATORS, AND VOLUNTEERS

9. Staff, Moderators, and Volunteers

9.1 What we hold and why

See Section 1.9 for what we hold, and Section 2.8 for why.

9.2 Confidentiality Agreements

All Air Defender staff are asked to sign a confidentiality agreement. We hold the signed agreement on the basis of our legitimate interest in protecting project and third-party confidential material. The agreement continues to bind you after your role ends, which is why we retain it (see Section 12).

9.3 When a role ends

When you leave a staff role we will:

- revoke access to all systems and remove privileged Discord and forum roles;
- retain your signed confidentiality agreement for the period in Section 12, because it continues to apply;
- retain a minimal access-history record — who had access to what, and when;
- delete other staff records, other than anything we must keep for a legal or safeguarding reason.

Your public contributions to the Discord server and forums are not automatically deleted when you leave a staff role. See Section 6.4.

ANNEX I: DATA SHARING AND THIRD-PARTIES

10. Data Sharing and Third-Parties

We **do not** sell your personal data, share it with data brokers, or use it for advertising.

We may share your information with:

- Payment Processors
 - Taking payment for merchandise
- Steam / Valve
 - Game distribution, Technical Support, Competition Prizes
- Delivery and Courier services
 - Merchandise Delivery
- Website analytics provider
 - Website analytics – **Only where you have consented**
- Discord Inc. / Discord Netherlands BV
 - Inherent to operating a server and application on their platform
- Our infrastructure provider
 - Hosting the staff server, bot capture storage, file storage, and forums
- Rotor3 Development team
 - Fixing Reported faults and assessing suggestions
- Anti-Cheat or Fraud prevention partners
 - Protecting game integrity
- Event venues and Partner Organisations
 - Access, Registration and Security, where they require it.
- Law Enforcement, Regulators, Safeguarding authorities
 - Where required by law, or where necessary to protect someone's safety.

Where a third party processes personal data **on our instructions**, we put a written contract in place meeting the requirements of Article 28 UK GDPR. Where a third party is an independent controller in its own right — Discord, Steam and payment processors, for example — their own privacy policy governs what they do with your data.

ANNEX J: INTERNATIONAL TRANSFERS

11. International Transfers

Some of the services above process personal data outside the UK, principally in the United States and the European Economic Area. This includes Discord, Steam, our payment processors and, where enabled, our website analytics provider.

Where personal data is transferred outside the UK, that transfer is covered by one of the following safeguards:

- a UK adequacy decision covering the destination country;
- the UK International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses;
- another safeguard permitted under Chapter V of the UK GDPR.

Our own staff server, Bot capture storage, file storage and forums are hosted in the Netherlands.

You can ask us for details of the safeguards applying to any particular transfer using the contact details above.

ANNEX K: DATA RETENTION**12. Data Retention**

We keep information only for as long as needed.

Data	Retention period
Support Tickets	Up to 24 Months
Game and Gameplay Logs	Typically up to 24 Months
Merchandise order records	6 years (legal requirement for financial records)
Discord public profile and role data	While you are a member of a server
Bot Captured text submissions	Until no longer required
Bot captured images, videos, and attachments	Until no longer required
Bot captured content forming part of moderation or safeguarding record	Until no longer required
Discord moderation records (Warnings, Mutes, Kicks)	24 Months from the date of the action
Ban Records	Retained Indefinitely
Bug Reports and Suggestions	Until resolved and Released, then 12 months
Log Files, Crash Dumps, and attachments on reports	90 Days after the report is closed
License activation and heartbeat records	For the duration of the licence, then 12 months
Forum accounts	While active; review after 24 months.
Forum IP and sessions logs	90 days
Event sign-ups and correspondence	12 Months after the event
Event photography and video	Until no longer required or until consent is withdrawn
Staff Confidentiality Agreements	6 Years after the role ends
Staff Access and permission records	2 years after the role ends

Marketing data and consent records	Until you withdraw consent
Security Logs	12 Months

ANNEX L: YOUR RIGHTS

13. Your rights

Under UK GDPR, you have the right to:

- **Access** your personal data, including anything the Bot has copied onto our systems
- **Correct** inaccurate information
- **Request deletion**, where legally permitted
- **Restrict** processing in certain circumstances
- **Object** to processing carried out on the basis of legitimate interests, including the Bot's capture of your submissions
- **Withdraw consent** at any time, where we rely on consent
- **Request data portability** for data you provided to us
- **Not be subject** to solely automated decisions producing legal or similarly significant effects

To exercise any of these, contact us using the details at the front of this policy. We will respond within one calendar month. We may ask you to confirm your identity first — usually by asking you to message us from the Discord or forum account concerned, or from the email address on the order.

Requests about Discord's own data must go to Discord. See Section 4.4. Requests about our copies come to us.

13.1 Complaints

If you are unhappy with how we have handled your personal data, you have the right to complain to the **Information Commissioner's Office**:

- **Web:** ico.org.uk
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would ask you to raise it with us first so we have the chance to put it right.

ANNEX M: COOKIES

14. Cookies

Our website and forums use cookies.

- **Strictly necessary cookies** — required for login sessions, security and basic site function. These are always set, and do not require your consent.

Disabling cookies in your browser will also work, but may prevent parts of the site from functioning.

ANNEX N: CHILDREN AND YOUNG PEOPLE

15. Children and Young People

Discord requires its users to be at least **13 years old**, and older in some countries. We do not knowingly permit under-13s on our Discord server or forums, and we will remove any account we become aware of. We do not knowingly collect data from children under 13 through any of our services. If we discover such data has been collected, we will delete it promptly.

Because Air Defender may be used in cadet and educational settings, we expect to interact with **young people aged 13 to 18**. Where we do:

- we collect the least data possible, and prefer to deal with a responsible adult;
- we do not send marketing to anyone we know or believe to be under 18;
- we do not publish identifiable images of under-18s without documented consent (Section 8.2);
- **content submitted by a young person and captured by the Bot is subject to the same deletion route as everyone else's** (Section 5.8), and we will action such a request without argument;
- if you are under 18, you can ask us to delete anything you have posted, and we will do so unless we are required to keep it;
- staff and moderators receive safeguarding guidance appropriate to their role.

If you are a parent, guardian or responsible adult and believe we hold data about a child in your care, contact us and we will deal with it promptly.

ANNEX O: HOW WE PROTECT YOUR DATA

16. How we protect your data

We use:

- Encrypted network connections (HTTPS) across all our services
- Secure authentication for staff, including two-factor authentication
- Restricted access to sensitive information, on a need-to-know basis by named role
- Administrative interfaces not exposed to the public internet
- Hashed password storage
- Encrypted transport between the Bot and our storage
- Regular audits, patching and security monitoring
- Data minimisation practices
- Staff training for privacy and safeguarding

ANNEX P: DATA BREACHES

17. Data Breaches

No system is perfectly secure. If we suffer a personal data breach that is likely to result in a risk to your rights and freedoms, we will:

- report it to the Information Commissioner's Office within **72 hours** of becoming aware;
- tell affected individuals directly, without undue delay, where the risk is high;
- notify Discord where the breach involves Discord API Data, as required by Discord's Developer Terms;
- record the breach, its effects and the remedial action taken.

The Data Protection Lead is responsible for breach reporting. If you believe you have found a security issue affecting our systems, please report it via a Discord support ticket or by email rather than posting it publicly.

ANNEX Q: CHANGES TO THIS PRIVACY POLICY

18. Changes to this privacy policy

We may update this policy to reflect changes in law or in our services. Material changes will be announced on the Discord server and the community forums at least **14 days** before they take effect. The revision number and “Last Revised” date will always indicate the current version and will be annotated in the Amendment Record at the top of this document.

ANNEX R: CONTACT US

19. Contact us

For any privacy-related questions or rights requests:

ROTOR3 Game Studio Email: privacy@airdefender.uk

Website: <https://airdefendergame.com>

For the quickest response, contact us via Discord. Go to the Air Defender Discord server, click “Support”, and open a “Contact Game Studio” support ticket, asking to speak to the Data Controller or the Data Protection Lead: <https://discord.gg/JQw9GcrmhE>