

UK GDPR Compliance Document

Air Wave Productions, LLC dba eQSL.cc

1. Privacy Notice

Privacy Notice for eQSL.cc

Controller: Air Wave Productions, LLC dba eQSL.cc

Location: United States

Contact: Dave Morris, N5UP, <https://eQSL.cc/Contact>

UK Representative: Alan Floyd, GDPR-UK@eQSL.cc

1. What We Do

eQSL.cc is an online exchange for electronic QSL cards between licensed amateur radio operators. Users voluntarily create a station profile, upload amateur radio log entries, and generate eQSL cards that are delivered to the intended QSO partner. We issue eAwards based on qualifying received eQSLs.

2. What Personal Data We Process

- Callsign
- Station location (QTH)
- QSO log details (date, time, band, mode, frequency, etc.)
- eQSL card designs
- Membership payment metadata (via Stripe or PayPal)
- Account email address
- IP address (for security)

We do **not** process credit card numbers, analytics data, or behavioral tracking data.

3. Why We Process Your Data (Lawful Basis)

We process your data under:

- **Performance of a Contract:** To generate and deliver eQSL cards and maintain award eligibility.
- **Legitimate Interests:**
 - Maintaining the integrity of amateur radio QSL records
 - Preventing fraud in award systems
 - Preserving the historical continuity of QSO confirmations
 - Ensuring recipients retain QSLs once delivered
 - Providing propagation research using depersonalized metadata

4. Why QSO Logs Cannot Be Withdrawn

Once a QSO log is uploaded and an eQSL is delivered, it becomes part of the **recipient's permanent QSL history**, just like a physical QSL card.

For this reason, we cannot delete or retract QSO logs after delivery.

5. Who Receives Your Data

Only the intended QSO partner (recipient) can view your eQSL.

Logs are **not public** and are not shared with third parties. Limited profile information (callsign, name, location) is available to third parties:

- Stripe (payments)
- PayPal (payments)
- Logger publishers (real-time call lookup)
- Member search screen (limited information on bands worked, awards earned, etc)

6. International Transfers

Your data is transferred to the United States via SSL.

We use the **UK Addendum to the EU Standard Contractual Clauses (SCCs)** or the **UK IDTA** to ensure lawful transfers.

7. How Long We Keep Data

- QSO logs: **Permanent** (for award integrity and historical continuity)
- Account data: Until account deletion
- Payment metadata: 7 years (tax/audit requirements)
- Backups: 30–90 days depending on rotation

8. Your Rights

You may request:

- Access
- Correction
- Objection (where applicable)
- Deletion (except QSO logs already delivered)

9. Security Measures

- Encrypted servers accessible only to the administrator and hosting techs
- Access controls
- No analytics or tracking
- No advertising except our own ad rotation system
- Secure backups
- MFA for admin accounts
- Vulnerability testing through our cybercrime insurance carrier

2. Record of Processing Activities (ROPA)

Controller: Air Wave Productions, LLC dba eQSL.cc

Processing Activities:

A. User Accounts

- **Data:** Email, callsign, password hash, QTH, card design, proof of identity
- **Purpose:** Provide access to eQSL services
- **Lawful Basis:** Contract
- **Retention:** Until account deletion
- **Recipients:** Internal SQL database
- **Security:** Encryption, access controls

B. QSO Log Uploads

- **Data:** QSO details contained in ADIF format logs
- **Purpose:** Generate and deliver eQSLs
- **Lawful Basis:** Contract + Legitimate Interests
- **Retention:** Permanent
- **Recipients:** QSO partner only
- **Security:** Encrypted storage

C. Membership Payments

- **Data:** Payment metadata (not card numbers)
- **Purpose:** Membership processing
- **Lawful Basis:** Contract + Legal obligation
- **Retention:** 7 years to Permanent
- **Recipients:** Stripe, PayPal

D. Security Logging

- **Data:** IP address, login attempts, SQL insertion attempts, page accesses
- **Purpose:** Fraud prevention, system integrity
- **Lawful Basis:** Legitimate Interests
- **Retention:** Permanent

3. Legitimate Interests Assessment (LIA)

Purpose of Processing

- Maintain integrity of QSL confirmations
- Prevent fraudulent award claims
- Preserve historical amateur radio records
- Ensure recipients retain QSLs once delivered

Necessity Test

- Permanent retention is required for award verification
- Deleting logs would undermine trust in the system
- No less intrusive alternative exists

Balancing Test

- Users voluntarily upload logs
- Only the intended recipient sees the QSL
- No analytics or profiling
- Minimal personal data involved
- Strong alignment with long-standing amateur radio tradition

Conclusion: Legitimate Interests is appropriate and balanced.

4. Data Retention Schedule

Data Type	Retention	Reason
QSO logs	Permanent	Award integrity, historical continuity
Account data	Until deletion	Service provision
Payment metadata	7 years	Tax & audit
Support emails	Permanent	Service history
Backups	30–90 days	Disaster recovery

5. International Transfer Documentation (Summary)

Mechanism:

- UK Addendum to EU SCCs **or**
- UK International Data Transfer Agreement (IDTA)

Scope:

- Transfers from UK users to US servers via SSL
- Transfers to Stripe/PayPal (US-based) via their payment pages

Risk Assessment Summary:

- Data is low-risk (non-sensitive)
- No analytics or profiling
- Strong security controls
- Reputable processors

6. Data Subject Rights

A. Access Requests

You can access your account profile information on the My Profile page. And you can access all your outgoing QSO logs by going to your OutBox.

Please note that QSO logs already delivered to recipients cannot be deleted.

B. Deletion Requests

You can unsubscribe by going to My Profile. You can permanently delete your account profile according to this GDPR document on the same My Profile screen by checking the GDPR box. This action is irreversible and you would need to create an entirely new account and start over, if you change your mind.

However, QSO logs already delivered to recipients cannot be withdrawn, as they form part of the recipient's permanent QSL history.

C. Correction Requests

You can edit your account profile at any time on the My Profile page. You can edit individual QSO log records on the OutBox screen, unless they have already been viewed by the recipient, in which case they are locked and not subject to change.

QSO logs cannot be deleted once delivered, but you may upload corrected logs (e.g. change in comment line, change of satellite name, change of RST, etc.)

7. Processor Inventory + DPAs

Stripe

- Purpose: Membership payments
- DPA: <https://stripe.com/legal/dpa>

PayPal

- Purpose: Membership payments
- DPA: <https://www.paypal.com/us/webapps/mpp/ua/data-protection> ([paypal.com in Bing](#))

Hosting Provider

- Purpose: Infrastructure
- DPA: Provided by Hostek.com

8. Security Measures Statement

- Encrypted servers
- TLS for all connections
- Password hashing
- MFA for admin accounts
- Access logging
- No analytics or tracking
- Regular patching
- Encrypted backups
- Regular third-party vulnerability testing

9. UK Representative

UK Representative:

Alan Floyd, GDPR-UK@eQSL.cc,

51, Falklands Rd. Sutton Bridge. Spalding, Lincolnshire PE12 9XF

10. Award Integrity & Data Ethics Statement

We do not release email addresses of our members to any third parties. eQSL.cc preserves the integrity of amateur radio award systems by maintaining permanent, tamper-resistant QSO records. This mirrors the long-standing tradition of physical QSL cards, which cannot be withdrawn once mailed. Our system protects both the sender and the recipient by ensuring that QSL confirmations remain historically accurate and verifiable.