

Privacy Policy for Members

Baddow & Galleywood U3A treats privacy seriously. This privacy policy sets out how we deal with your personal data, i.e. data that could identify, or is related to the identity of, an individual. This policy addresses your right to be informed under GDPR (General Data Protection Regulation) and covers the personal data belonging to our members. Further privacy policies are available from our Business Secretary which additionally cover the data belonging to Committee Members, Interest Group Co-ordinators, non-committee roles such as Newsletter Editor and Website Bluebird mail recipient, and our suppliers etc.

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Definitions

As a U3A member you are deemed to be an **Interest Group member** after attending two meetings and indicating to the Interest Group Co-ordinator that you wish to be a member. You may leave an Interest Group by request to the Co-ordinator, and are deemed to have left after not attending three consecutive meetings without sending apologies or other acceptable reason.

All references to **members** in this policy refer to both full and associate members of the Baddow & Galleywood U3A.

All references to **we, us** or **our** in this policy refer to the Baddow & Galleywood U3A.

1. What personal data do we collect?

If you express an interest in becoming a member of our U3A you will be asked to provide your name, address, email address, telephone number(s), subscription preferences (i.e. receive Third Age Matters), emergency contact details and Gift Aid instructions.

We will collect further personal data during membership, such as health/disability needs and details of any incidents, and we will record your membership number, payments and dates, group membership, and attendance at both main meetings and Interest Groups.

You may appear in photographs taken at events (you may opt out of this, see section 5) and some Interest Groups collect further data such as skills/interests. You may contribute family history in the Family History group.

We may collect data about health/disability needs of members in the event of loss of contact and/or in preparing for events where there are potential limitations such as wheelchair access. Any such data will be limited to basic facts, such as that a member is in hospital or uses a wheelchair; we do not process details of medical conditions or treatments. We may use this data for well wishing and making provisions for disabilities. In the event that we establish that contact has been lost for a non-health related reason (e.g. an extended holiday) then we will not attempt to re-establish contact until an expected return date; no other data is stored.

The **lawful basis**¹ for collecting and storing your membership data is the contractual relationship that members have with us. We maintain statistics of attendance at events, a summary of your disability needs and details of any incidents as necessary for proper operation of our U3A on the basis of our legitimate interest as an organisation. Other data is collected on the basis of your consent, this is explained further in section 5.

2. How do we collect this personal data?

Much of the data collected is obtained directly from members via the membership forms. Some data is provided verbally or by records of meeting attendance. Certain data will also be collected when you join an Interest Group and if you are involved in an incident.

You may email personal data to Committee Members and/or Interest Group Co-ordinators, for example mentioning a health condition as a reason for not attending a meeting. We ask you to limit this to basic facts (e.g. a temporary mobility problem) because we do not process further detail and moreover email suffers from inherent insecurities.

3. How do we use your personal data?

We use your personal data:

- To provide our U3A activities and services to you
- For administration, planning and management of our U3A
- To communicate with you about our Interest Group activities
- To monitor, develop and improve the provision of our U3A activities

We will send members information by email, post or telephone to advise you of our activities.

We do not use automated decision making, i.e. all decision making is by Committee Members and/or Interest Group Co-ordinators.

4. With whom do we share your personal data?

We may disclose some or all of the personal data we hold:

Internally, to Committee Members and Interest Group Co-ordinators, as required to facilitate your participation in our U3A activities.

¹ The term lawful basis is defined by the UK Information Commissioner's Office, for further details see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>. The lawful bases we use for processing data are Consent meaning that you have given consent for the processing, Contract which refers to the contractual relationship that members have with us, and Legitimate Interest which means that the processing is considered to be necessary for proper operation of our U3A.

With members via our newsletter and Facebook Closed User Groups (CUGs). Our newsletter is distributed to members and the Facebook CUGs are restricted to members.

In order to join a Facebook CUG, you must first become a member of Facebook. You are advised to use your Facebook privacy settings to control how much of your personal data on Facebook, that exists independently of the CUG, is visible to the other CUG members.

We may share health data with other members who are likely to be concerned (e.g. fellow Interest Group members).

Externally:

- For products or services such as direct mailing for the Third Age Matters magazine, and transport/tour operators if you join any applicable events;
- If we have a statutory duty to disclose it for legal/regulatory reasons, e.g. HMRC for Gift Aid purposes;
- With the emergency services in the event of an emergency;
- Via information posted on our website which is public;
- Our email addresses are shared with our distributor Mailchimp. Data on our Facebook CUGs are shared with Facebook.

5. What use is made of consent?

Some data are processed on the basis of consent. The data in this category are:

- Some Interest Groups share contact details of their members, i.e. address, email address and/or telephone numbers. This is only done if group members give consent to the Interest Group Co-ordinator.
- If group photographs are taken at our events then you will be asked to step out of shot if you do not consent to be in the photograph. Otherwise consent will be deemed to have been obtained.
- Subscription to the Third Age Matters magazine.
- Skills/interests and family history data contributed to Interest Groups.

If you take photographs that include identifiable people then you must obtain consent before posting the photographs at meetings, in newsletters, on our website, on our Facebook CUGs, and/or any other shared site/publication. Note that identifiable people include those who are not members of our U3A.

6. How long do we keep your personal data?

We need to keep your data so that we can provide our services to you and trade with suppliers.

We keep primary membership data (i.e. name, address, payment record, Gift Aid) for six years. Other data is kept for one year, with the following exceptions:

- There is no planned deletion of published data such as photographs. They may be refreshed after a few years or when storage space is short. However printed copies are not deleted.
- Main meeting attendance is deleted after two months, and converted to attendance statistics.
- Details of incidents are held for three years.

Erasure of material you post on a Facebook CUG is your responsibility.

Consent based data are deleted as soon as possible after you remove consent, except in the case of printed material where removal is not practical.

Email addresses that have been removed from our membership database may remain in email storage used by Committee Members and/or Interest Group Co-ordinators.

7. How your data can be updated or corrected

To ensure the data we hold is accurate and up to date, members need to inform us of any changes to their personal data. You can do this by contacting the Membership Secretary at any mutually convenient time. In addition you will have the opportunity to update your data, as required, via the annual membership renewal process.

Should you wish to view the data that the U3A holds on you, you can make this request by contacting the Membership Secretary. There may however be certain circumstances where we are not able to comply with this request. This would include where the data may contain references to other individuals or for legal, investigative or security reasons. Otherwise we will usually respond within 28 days of the request being made.

8. How do we store your personal data?

We have in place a range of security safeguards to protect your personal data against loss or theft, as well as unauthorised access, disclosure, copying, use or modification. Security measures include file encryption, password protection and offsite backups. The full set of membership data is held on a database and can be accessed only by nominated Committee Members.

Further information about our security procedures is in our Data Protection Policy which is available by request to the Business Secretary.

9. Your rights

In addition to your right to check your personal data, you have a right to withdraw consent for consent-based data and to object to certain other forms of processing. You may exercise your rights by contacting the Membership Secretary, and you may contact the Chairman if you are not satisfied with the way your rights are handled.

10. Availability and changes to this policy

This policy is available on our website and a printed version can be supplied on request to the Business Secretary. This policy may change from time to time. If we make any material changes we will make members aware of this via the monthly meetings and newsletters.

11. Contact

If you have any queries about this policy, need it in an alternative format, or have any complaints about our privacy practices, please contact our Business Secretary via our website <https://u3asites.org.uk/baddow/contact>. Please supply a stamped addressed envelope if you require paper copies of policies.

Version: 1

Date: October 2019