

# **Bishops Cleeve u3a**

## **PRIVACY POLICY**

### **Introduction**

Bishop's Cleeve u3a treats your privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you.

### **1. Personal Data**

In this Privacy Policy, where we use the words personal data, we use these words to describe information that is about you and which identifies you.

#### **1.2 In this Privacy Policy:**

- a) The word Trust means The Third Age Trust (charity number 288007)
- b) The initials TATTL means Third Age Trust Trading Limited (company number 11899419) and
- c) The Beacon System means the membership data system operated by TATTL
- d) The word Website means the public website (<http://u3asites.org.uk/bishops-cleeve>) run by Bishop's Cleeve u3a

#### **1.3 This Policy describes:**

- a) Who is responsible for the personal data that we collect about you
- b) The personal data we collect about you
- c) How we will use it
- d) Who we may disclose it to
- e) Your rights and choices in relation to your personal data

This is to make sure you have a full picture of how we collect and use your personal data.

### **2. Who is responsible for the personal data that we collect?**

Bishop's Cleeve u3a Trustees collectively are the data controllers in respect of your personal data collected and used by us for the purposes of data protection law.

### **3. What personal data do we hold about you?**

We collect and use personal data about you for the purposes of communicating with you as representative of your u3a and of managing the u3a.

### **4. Information that you provide to us / we collect from you**

The information that you provide to us / we collect from you may include the following:

| Type of Personal Data   | Examples  |
|---|---|
| General   |   |
| Contact information   | <p>When you express an interest in becoming a member of Bishops Cleeve u3a you will be asked to provide certain information. This includes:</p> <ul style="list-style-type: none"> <li>• your name</li> <li>• home address</li> <li>• email address</li> <li>• telephone number</li> <li>• emergency contact details</li> <li>• your Gift Aid status</li> </ul>   |
| Marketing   |   |
| Subscription Preferences  | Details of any marketing preferences that you express including any opt outs you provide.   |
| Other   |   |
| Online activity information (to the extent that it constitutes personal data) | <p>Technical information, through your internet browser or electronic device. Certain information is collected by most websites or automatically through your electronic device, such as your IP address (i.e. your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, electronic device manufacturer and model, language, time of the visit and pages visited.</p> <p>Technical information, using cookies and online tracking: Cookies are pieces of information stored directly on the device you are using to access our Website or Beacon. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the Website and the pages visited.</p> <p>Information about the groups you lead or belong to</p> <p>Any posts or other responsibilities you may have</p> |

|  |   |
|--|---|
|  | Details of monies given by you to us or by us to you. |
|--|---|

## 5. This information may be provided:

- a) in the course of communications between you and us (including by phone, email or otherwise);
- b) when you provide personal data via our Websites or using other systems which we provide to you;
- c) via our social media pages, other social media content, tools and applications;
- d) via photographs and information received from other members.

In all cases of data provided by third parties we will ask them to confirm that they have your consent to share such personal data with us and that they have made the information in this Privacy Policy available to you.

## 6. Information about third parties

In the course of us communicating with you, you may provide us with personal or other data relating to third parties for example who to contact in an emergency.

### 6.1 Consent and third parties

We will use this personal data in accordance with this Privacy Policy. If you are providing personal data to us relating to a third party, you confirm that you have the consent of the third party to share such personal data with us and that you have made the information in this Privacy Policy available to the third party.

## 7. How do we use the personal data we collect about you?

### 7.1 Legal Bases

We have set out our reasons for using your personal data in the table below under the heading **Legal Basis and/or Legitimate Interest and/or Contract**.

| Purpose   | Legal Bases         |
|---|---------------------|
| To set up and manage your membership  | Legitimate interest |
| To manage membership information on the Beacon system   | Legitimate interest |
| To share with the Trust and TATTL to manage, develop and make improvements to the Beacon system | Legitimate interest |
| To administer, plan and manage our u3a  | Legitimate interest |
| To monitor, develop and improve the provision of our u3a activity                               | Legitimate interest |

| Purpose   | Legal Bases                        |
|---|------------------------------------|
| To communicate with you about our u3a products, services, activities and events and those of other u3as or clusters of u3as | Legitimate interest                |
| To communicate with you about Trust products, services, activities and events   | Legitimate interest                |
| To deliver Trust publications including Third Age Matters   | Contract<br>Legitimate interest    |
| To comply with any legal or regulatory obligations (including in connection with a court order)                             | Legal Basis                        |
| To enforce or apply the agreements concerning you (including agreements between you and us).                                | Legal Basis                        |
| To manage any issues, complaints, feedback and enquiries.   | Legal Basis<br>Legitimate interest |
| To provide means for members to pay for services  | Legal Basis<br>Legitimate Interest |

## 8. Automated processing

We do not use your personal data to make any automated decisions that might affect you.

## 9. Who may we disclose your Personal data to?

### 9.1 We may share your personal data with:

- a) The Beacon Administrator, Group Leaders and the Editor of our newsletter
- b) The Third Age Trust
- c) Third Age Trust Trading Limited (TATL)
- d) Our service providers and business partners.

For more information please refer to Schedules 1 and 2.

## 10. We may also disclose your personal data to other third parties, for example:

- a) if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group) personal data held by us will be one of the transferred assets; and
- b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you (including agreements between you and us).

## 11. Where will we transfer your personal data?

If we transfer personal data outside the UK or the European Economic Area (**EEA**), we will implement appropriate and suitable safeguards to ensure that such personal data will be protected as required by applicable data protection law.

## 12. How long will we keep your personal data?

We will keep your personal data for different periods depending on the nature of the information, the purpose for which it was collected, any legal obligation and/or business reason to retain.

### 12.1. Extensions

Please note that the above retention period may be extended where we need to preserve and use personal data for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal data for as long as is necessary to deal with the legal proceedings.

## 13. Your rights

You have certain rights with respect to your personal data. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. Details of who to contact to exercise these rights can be found in paragraph 14.

|  | Summary of your rights   |
|--|--|
| <b>Right of access to your personal data</b> | You have the right to receive a copy of your personal data that we hold about you and information about how we use it, subject to certain exemptions.  |
| <b>Right to rectify your personal data</b>   | <p>You have the right to correct your personal data that we hold where it is incorrect or incomplete directly through Beacon or to ask the Beacon Administrator or Memberships Secretary to do so.</p> <p>On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process. You can view the information that the u3a holds on you:</p> <ol style="list-style-type: none"><li>1. by contacting the membership secretary</li><li>2. by logging into your personal account via Beacon</li><li>3. by contacting the Treasurer regarding financial matters</li><li>4. by asking to see Committee minutes which refer to you</li></ol> <p>There may be certain circumstances where we are not able to comply with this request. This would include where the information may contain references to other individuals or for legal, investigative or security reasons. Otherwise we will usually respond within one month of the request being made.</p> |

|   | Summary of your rights  |
|---|---|
| <b>Right to erasure of your personal data</b>           | <p>You have the right to ask that your personal data be deleted in certain circumstances. For example:</p> <ol style="list-style-type: none"> <li>1. where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used;</li> <li>2. if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal data;</li> <li>3. if you object to the use of your personal data (as set out below);</li> <li>4. if we have used your personal data unlawfully; or</li> <li>5. if your personal data needs to be erased to comply with a legal obligation.</li> </ol>  |
| <b>Right to restrict the use of your personal data</b>  | <p>You have the right to suspend our use of your personal data in certain circumstances. For example:</p> <ol style="list-style-type: none"> <li>1. where you think your personal data is inaccurate but only for so long as is required for us to verify the accuracy of your personal data</li> <li>2. the use of your personal data is unlawful and you oppose the erasure of your personal data and request that it is suspended instead</li> <li>3. we no longer need your personal data, but your personal data is required by you for the establishment, exercise or defence of legal claims</li> <li>4. you have objected to the use of your personal data and we are verifying whether our grounds for the use of your personal data override your objection.</li> </ol> |
| <b>Right to data portability</b>                        | <p>You have the right to obtain your personal data in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>The right only applies:</p> <ol style="list-style-type: none"> <li>1. to personal data you provided to us;</li> <li>2. where we rely on the following legal bases: <ol style="list-style-type: none"> <li>a) consent; or</li> <li>b) for the performance of a contract</li> </ol> </li> </ol>  |
| <b>Right to object to the use of your personal data</b> | <p>You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:</p> <ol style="list-style-type: none"> <li>1. where you have grounds relating to your particular situation and we use your personal data for our legitimate interests (or those of a third party)</li> <li>2. if you object to the use of your personal data for direct marketing purposes</li> </ol>   |

|  | Summary of your rights  |
|--|---|
|  |   |
| <b>Right to withdraw consent</b>                                   | You have the right to withdraw your consent at any time where we rely on consent to use your personal data.   |
| <b>Right to complain to the relevant data protection authority</b> | <p>You have the right to complain to the relevant data protection authority, which is in the case of us, the Information Commissioner's Office (<b>ICO</b>), where you think we have not used your personal data in accordance with data protection law. The ICO's contact details are:</p> <p>Information Commissioner's Office<br/> Wycliffe House<br/> Water Lane<br/> Wilmslow<br/> Cheshire<br/> SK9 5AF</p> |

#### 14. Third party links

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your personal data. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

#### 15. Cookies

The Website and the Beacon System use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse them and also allows us to improve them. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policies:

1. Beacon System: <https://u3abeacon.zendesk.com/hc/en-gb/articles/6432020094109-5-Beacon-Cookies>
2. Website: <https://u3asites.org.uk/Cookie%20Policy%20v2.0.pdf>

#### 16. Changes to our privacy policy

This Privacy Policy is available on our website or on request to the Membership Secretary. This policy may change from time to time. Members will be informed via the newsletter when any material changes are made to Bishop's Cleeve u3a's policies and procedures.

#### 17. Queries

##### 17.1. Queries regarding this policy or use of data

If you have any questions regarding this Privacy Policy or the way we use your personal data, please contact:

##### **The Membership Secretary**

by Telephone: 0790 8490 571

By Email: [membership@cleeve-u3a.org.uk](mailto:membership@cleeve-u3a.org.uk)

## **18. Adoption and Review**

This policy was adopted on 2<sup>nd</sup> February 2024

Policy review date: February 2025



## SCHEDULE 1

### WHO IS PERSONAL DATA SHARED WITH?

| Type of third party   | Examples  |
|---|---|
| <b>General</b>  |   |
| Our service providers and business partners                       | Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you (see Schedule 2)  |
| Our professional advisers   | Including accountants, lawyers and other professional advisers that assist us in carrying out our business activities.  |
| Government authorities and third parties involved in court action | External agencies and organisations (including the police and other law enforcement agencies) for the purpose of complying with applicable legal and regulatory obligations.  |
| Government authorities, third parties and other members           | Safeguarding  |
| Government agencies, the Charity Commission and local venues      | Those who reasonably need to know based on your role  |
| <b>Law Enforcement and Regulation</b>                             |   |
| Police and law enforcement agencies                               | We may share personal data with the police and other law enforcement agencies in connection with the prevention and detection of crime  |
| Regulatory bodies   | We may share personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties |

## SCHEDULE 2

### OUR SERVICE PROVIDERS AND BUSINESS PARTNERS

| Name of third party             | Purpose  |
|---------------------------------|--|
| Third Age Trust                 | For Third Age Trust to provide membership support, advice and guidance   |
| Third Age Trust Trading Limited | For Third Age Trust Trading Limited to provide various services  |
| Other relevant u3as             | To confirm membership with us  |
| Other third party processors    | Printers (distribution of hard copy of Clarion)<br>Google and Dropbox to provide cloud storage and data sharing services<br>GoCardless, Square and PayPal to provide members with means to pay for membership and services |