



Registered Charity No. 1029004

Crawley u3a Privacy Policy

Introduction

Privacy

Crawley u3a (we/us) treats your privacy rights seriously. This **Privacy Policy** sets out the basis on which we collect and use **personal data** about you.

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.

This Policy describes:

- 1) Who is responsible for the personal data that we collect about you;
- 2) The personal data we collect about you;
- 3) How we collect it;
- 4) How we use it;
- 5) Your rights relating to photographs and videos;
- 6) Which third parties we share it with;
- 7) Who in Crawley u3a has access to your data;
- 8) How we store and process your data;
- 9) How long we will retain your data for;
- 10) Your rights and choices in relation to your personal data;
- 11) How you will be informed if there are any changes to the Privacy Policy.

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

1. Responsibility for the personal data that we collect

We, the members of Crawley u3a Committee and Crawley u3a Trustees, are the **Data Controllers** for the purposes of data protection law, in respect of your personal data collected and used by us.

2. The personal data do we hold about you

(i) Data we require from all members

- (a) Members Contact Data
 - Name
 - Address
 - Telephone number (home and/or mobile)
 - E-mail address
- (b) Members Gift Aid status
- (c) Members Emergency Contact Data:
 - Name
 - Telephone number (home and/or mobile)
- (d) Primary u3a (for Associate members only)
- (e) Whether you wish to take the Third Age Matters (TAM) magazine

(ii) Data given on a voluntary basis only

- (f) Bank account details, when members require a refund of expenses incurred or some other payment
- (g) Members Previous Occupation
- (h) Any particular accessibility needs, such as wheelchair user, sight or hearing impaired

3. How we collect this data

All data collected is obtained directly from you.

Data other than bank account details are collected by:

- (a) Through your application form (new members)
- (b) Through your renewal form or an annual e-mail or letter contact to check that the data we hold on you is correct (for renewing members)

Bank account data (normally only relevant to members requiring a refund of expenses, fees or a deposit paid for a trip) is collected either through the expenses form submitted or via an e-mail or letter.

4. How we use this data

(i) Data we require from all members

- (a) To set up and manage your membership of Crawley u3a
- (b) To set up and manage your membership of Crawley u3a activity groups, for those who join groups
- (c) To manage attendance at Crawley u3a outings and events open to all members
- (d) To communicate with you about activities and events
- (e) To send you the monthly Crawley u3a newsletter
- (f) To deliver Trust publications including Third Age Matters
- (g) To conduct occasional surveys on members' views
- (h) To manage any issues, complaints, feedback and enquiries
- (i) To make Gift Aid claims to His Majesty Revenue and Customs (HMRC) (Gift Aid registering members only)
- (j) To invoice Members for any other services they consume

(ii) Data given on a voluntary basis only

Bank Details: To refund expenses incurred or to make any other payments to members

Previous Occupation: To assist the Committee in identifying members who have skills which could be useful to the Committee or specific Groups.

Accessibility Needs: To assist the Committee and Group Leaders in improving the u3a experience for relevant members.

GDPR requires that personal data must only be collected for specified, explicit and legitimate purposes and that you consent to us collecting it. It requires that all organisations need to establish a **lawful basis** for processing data.

We use the **lawful basis of legitimate interest** the data we require from all members. In accepting membership applications the u3a has a legitimate interest in requesting and processing personal information from those who wish to join. In addition, the u3a has a **legitimate interest** in communicating with existing members to inform them about activities relating to their membership.

To meet the requirements of this lawful basis we have completed a **legitimate interest assessment (LIA)**. The Secretary (Data Protection Officer) retains a copy of this.

5. Rights regarding Photographs and Videos

Photographs and videos constitute personal data and your consent will be requested when taking photographs. Photographs will only be taken for u3a purposes, and you will be informed of the purpose for which the photograph is to be used (e.g. the monthly newsletter, a leaflet advertising the u3a).

Where group photographs are being taken, or videos shot, any members of the group who don't wish to be included in the photograph or video will be asked to move out of shot.

If a member objects subsequently to a photo which includes themselves then they need to contact the Secretary (Data Protection Officer) who will then ensure that the photo is removed from any publicity or display.

6. Sharing data with third parties

We share personal data only with the Third Age Trust (TAT), and Third Age Trust Ltd (TATTL), for the national mailing of the Third Age Matters (TAM) magazine. The only information passed to them is your name, address and the u3a to which you belong (your main u3a in the case of Associate members). The data is submitted via a secure portal.

Members will be informed and have a choice as to whether or not they wish to receive TAM.

For those who are Gift Aid registered, we share your name, address and the amount of your membership fee and any other donation with HMRC

We do not use members information for sending information on non-u3a matters or information on behalf of other organisations.

The Third Age Trust SiteBuilder tool, used to create the Crawley u3a website, does not support the use of cookies, including third party cookies, on individual u3a sites. No third-party advertising cookies are permitted anywhere within the u3asites.org.uk domain.

For coach trips within the UK organised and booked by Crawley u3a no personal data is shared with the coach operator or the venue. U3a trips abroad are operated by professional tour companies, to whom members provide personal details, so it is the Privacy Policy of the tour company which is relevant in these cases, not that of Crawley u3a.

7. The people within Crawley u3a who have access to your data

(1) All Committee Members (Trustees) as shown on the Contacts page of the Crawley u3a website

(2) The following Committee Support post holders:

- Membership Support
- Welfare Support
- Beacon Administrator
- Assistant Treasurer

- (3) The Group Leader and/or Group Administrator of any activity groups you belong to
- (4) Any member of Crawley u3a leading a walk, a trip or outdoor activity in which you are taking part will be carrying the Emergency Contact Data for all participants

8. Storing and processing your data

(i) Data stored within Beacon

Crawley u3a uses the Beacon management system, provided by the Third Age Trust, to store all your personal data with the exception of any member's bank account details (which are only required for those members needed a refund of expenses incurred or some other payment)

We exercise the following policies to ensure the data within Beacon is kept secure:

- (a) All Beacon users (those people listed under 7 (1)-(3) above) undergo training on their responsibilities under GDPR, as well as on how to use the system
- (b) Access to the data is stored by a two-step login and password system
- (c) Access inside Beacon is restricted on a need-to-use basis, and approved by the Committee

(ii) Paper records

Membership forms, Gift Aid declaration forms, and expense and payment forms are stored in paper form, under the custodianship of the relevant Trustee (the Members' Coordinator stores the membership forms, the Treasurer all others). Once their retention period comes to an end (see 9. below) they are shredded and securely disposed of.

Members' banking details for payment purposes are recorded within our Bank's financial system, but the data is not available for them to access or use.

(iii) On Committee Members Laptops and Computers

Members' banking details collected for payment purposes are collected by e-mail (or from a form completed by the member) and stored in an electronic folder on the Treasurer's laptop, to provide supporting documentation for the financial accounts. These folders are deleted after a maximum time of two years (the end of the financial year to which they refer).

Members' banking details for payment purposes are recorded within our Bank's financial system, but the data is not available for them to access or use. The Assistant Treasurer has access to these details.

The Treasurer also stores the names and addresses of all members in outdoor groups in his Quickbook application on his Laptop. These details are then used to invoice the members for their annual outdoor groups' membership fees. The Treasurer may in future delegate this task to the Assistant Treasurer.

9. How long your data is retained

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.

For those members who register for Gift Aid we have to keep declaration records for 6 years from the end of the accounting period they relate to. This overrides any GDPR policy requirements.

Paper membership forms, expense forms, and other documents supporting payments to members, plus associated bank records are kept to the end of the financial and membership year (which for Crawley u3a

runs from September to the following August) following that to which the document relates. This means the maximum period such documents are retained for is two years.

The exceptions to the above are instances where there may be legal or insurance circumstances that require information to be held longer whilst this is investigated or resolved. Where this is the case then the member/s will be informed as to how long the information will be held for and when it is deleted.

10. Your rights and choices in relation to personal data

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.

	Summary of your rights
Right of access to your personal data	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.
Right to rectify your personal data	<p>You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete.</p> <p>To ensure the information we hold is accurate and up to date, members need to inform the u3a as to any changes to their personal information. You can do this by contacting the Secretary (who acts as the Data Protection Officer) via the Contacts page of the Crawley u3a website or via the e-mail secretary@crawleyu3a.org.uk</p> <p>On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process. Should you wish to view the information that the u3a holds on you, you can make this request by contacting the Data Protection Officer. We will usually respond within one month of the request being made.</p>
Right to erasure of your personal data	<p>You have the right to ask that your personal data be deleted in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used; • 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; • if you object to the use of your personal data (as set out below); • if we have used your personal data unlawfully; or • if your personal data needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal data	<p>You have the right to suspend our use of your personal data in certain circumstances. For example:</p> <ul style="list-style-type: none"> • 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;

	Summary of your rights
	<ul style="list-style-type: none"> the use of your personal data is unlawful and you oppose the erasure of your personal data and request that it is suspended instead; we no longer need your personal data, but your personal data is required by you for the establishment, exercise or defence of legal claims; or 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.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal data (this covers the information on your previous occupation and any physical or mental health conditions you have declared)
Right to complain to the relevant data protection authority	<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 (ICO), 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 Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF</p>

11. How you will be informed of any changes to our Policy

This Privacy Policy is available on the members page of the Crawley u3a web. This policy may change from time to time. Members will be informed via the newsletter when any material changes are made to this policy.

Queries regarding this policy or use of data

If, after reading the above, you have any questions regarding this Privacy Policy or the way we use your personal data, please contact the Secretary via the e-mail secretary@crawleyu3a.org.uk or via the contacts page of the Crawley u3a web.

Version	Description of changes	Date
1.0	Privacy Policy Template for u3as in England, Scotland & Wales	November 2021
2.0	Draft Privacy Policy for Crawley u3a Margaret Lloyd, Secretary	26/02/23
2.1	Draft Privacy Policy for Crawley u3a. A few minor changes to the version on 26/02/23 Margaret Lloyd, Secretary	2/03/23

2.2	Minor changes such as rephrasing the headings for 1 to 11 so they are no longer in the form of questions	22/03/23
2.3	Correction of typos as advised by Treasurer (Graham Friday) 24 th March	26/03/23
3.0	Input of final paragraph under 6. Sharing Data with Third Parties	03/04/23