



Dulwich and District u3a Privacy Policy

1 Introduction

Dulwich and District u3a treats member privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you. By **personal data** we mean information which is about you and which identifies you.

In this Privacy Policy:

- the word **Trust** means The Third Age Trust (charity number 288007)
- the word **TATTL** means Third Age Trust Trading Limited (company number 11899419)
- the **Beacon System** means the membership data system operated by TATTL
- the words **we** and **us** mean the Trustees of Dulwich and District u3a.

This Policy describes:

- who is responsible for the personal data that we collect about you;
- the personal data we collect about you;
- how we will use it;
- who we may disclose it to; and
- 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?

The Trustees are the data controller for the purposes of data protection law, in respect of your personal data collected and used by us.

3 What personal data do we hold?

When you express an interest in becoming a member of Dulwich and District u3a you will be asked to provide information including: your name, home address, email address, telephone numbers, interests and skills, and Gift Aid declaration (if you have chosen to complete it). You may also express subscription preferences – for example to opt-out of receiving the Third Age Matters magazine.

All the information collected is obtained from the members. This information may be provided:

- at the point of initial registration when the information is collected via membership forms;
- in the course of communications between you and us (including by phone, email or otherwise);
- when you provide personal data via our websites or using other systems that we provide to you;
- via our social media pages, other social media content, tools and applications.

4 Information about third parties

In the course of us communicating with you, you may provide us with personal data relating to 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.

5 How do we use the personal data?

5.1 Purposes

We use your personal data for a variety of different purposes when providing services to you. The purposes for which we use your personal data are set out below. Under data protection law, we can only use your personal data if we have a legal basis to do so. Examples of where we have a legal basis to process your personal data, includes when:

- we have your **consent**;
- it is necessary to enter into or perform a **contract** we have with you (or to take steps at your request prior to entering into that contract);
- it is necessary to comply with a **legal obligation**; or
- it is in our **legitimate interests** to process your personal data.

5.2 Legal Basis

The reasons for using your personal data are set out in the table below under the heading **Legal Basis**.

Purpose	Legal Basis
To set up and manage your membership	Contract, legitimate interests
To manage membership information on the Beacon system	Contract, legitimate interests
To share with the Trust and TATTL to manage, develop and make improvements to the Beacon system	Legitimate interests
To administer, plan and manage our u3a	Legitimate interests
To monitor, develop and improve the provision of our u3a activity	Legitimate interests
To communicate with you about our u3a products, services, activities and events	Contract, legitimate interests
To communicate with you about Trust products, services, activities and events	Contract, legitimate interests
To deliver Trust publications including Third Age Matters	Contract, legitimate interests

To comply with any legal or regulatory obligations (including in connection with a court order)	Legal obligation
To enforce or apply the agreements concerning you (including agreements between you and us).	Contract, legitimate interests
To manage any issues, complaints, feedback and enquiries.	Consent, contract, legitimate interests

6 Automated processing

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

7 Who may we disclose your personal data to?

We may share information about members with:

- trustees and group convenors, in order to facilitate participation in u3a activities;
- other members supporting us as volunteers, to allow members other than trustees to help with administrative tasks;
- the Third Age Trust and Third Age Trust Trading Limited, to provide membership support, advice and guidance, and various services such as the Third Age Trust magazines (*Third Age Matters* and *Sources*) and the Beacon System;
- our service providers and business partners, such as Mailchimp or organisations which are responsible for direct mailing of e.g. the Dulwich and District u3a Directories;
- HMRC, for the purpose of claiming Gift Aid;
- our professional advisers, for example accountants or lawyers;
- government authorities and third parties involved in court action;
- police and law enforcement agencies;
- regulatory bodies;
- other third parties if we are under a duty to disclose personal data in order to comply with any legal obligation.

8 How long do we keep personal data?

We need to keep personal data so that we can provide our services to members. 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.

In most instances information about a member will not be stored on the Beacon System for longer than 12 months after their membership of Dulwich and District u3a has ceased. The exceptions to this are instances where there may be legal (e.g. Gift Aid) or insurance circumstances that require information to be held for longer.

Please note that the 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.

9 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. To exercise these rights please contact the Membership Secretary at membership@dulwich-u3a.uk.

	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 Dulwich and District u3a of any changes to their personal information by sending an email to the Membership Secretary at membership@dulwich-u3a.uk.</p> <p>Should you wish to view the information that the U3A holds on you, you can make this request by contacting the membership secretary. 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>
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 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; · 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

	<ul style="list-style-type: none"> · 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 data portability	<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> <ul style="list-style-type: none"> · to personal data you provided to us; · where we rely on the following legal bases: <ul style="list-style-type: none"> · consent; or · for the performance of a contract; and · when the use of your personal data is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal data	<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> <ul style="list-style-type: none"> · 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).
Right to withdraw consent	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal data.</p>
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>

10 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.

11 Cookies

Our website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and also allows us to improve the website. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

12 Availability and changes to this policy

This policy is available on the Dulwich and District u3a website and printed copies may be obtained from the Membership Secretary. The policy will be reviewed every two years or sooner if required by updated legislation or guidance.

Version	Date	Lead Author	Approved by/date	Review date
1.5	10 Jan 2021	Anne Sharpley	Dulwich and District u3a Trustees 14 January 2021	January 2023
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