# **Ledbury and District u3a**

## **Privacy Policy**

As you would expect, your committee has always taken the security and use of your data seriously. It is held securely and is only used for u3a business. This policy gives more detail of how your personal data (that is, information which identifies or is related to the identity of an individual person) is gathered, stored and used, and what your rights are over your data.

This policy exists to ensure that the Ledbury & District u3a

- Complies with Data Protection law and follows good practice
- Protects the rights of members and keeps their data secure
- Is open about how it stores and processes members' data.

In order to provide and enhance contracted services, data will be accessed and used by u3a members designated by the Ledbury and District u3a Committee in line with data protection principles of the Data Protection Act 2018, and the General Data Protection Regulation (GDPR).

#### 1. What data do we collect?

When you express an interest in becoming a member of Ledbury and District u3a you will be asked to provide certain information. This may include additional data you choose to share with us to help us communicate with you, either one-to-one or as a possible member of any future social media group you may choose to join:

- Name (forename(s) and surname)
- Suffix after your surname
- Familiar Name, optional, by which you prefer to be addressed
- Gender, optional, or may be derived from your title
- Address including Postcode
- Telephone number
- Mobile number
- Email address
- Partner's u3a Membership Number where you have a joint membership
- Status of Membership (whether you have renewed, resigned etc)
- Pictorial e.g., in a photo of you taken during a group activity
- Gift Aid Date if you elect to allow the Ledbury and District u3a to reclaim tax on your subscription
- Date Joined
- Date Renewed
- Date Lapsed
- Your Group membership(s) if any i.e., name of interest group
- If a Group Leader, which group(s) you lead
- Financial Membership Transactions (e.g., membership fee) (this does **not include** any credit card or similar banking information beyond the joining fees paid).
- Emergency contact details
- If you are willing to provide details, we may also hold social media contact information e.g., handle / label used on Facebook, LinkedIn or Twitter.

### 2. How do we collect your personal data?

In order to inform you about the groups, activities and events that you can access as a member we need to store and process a certain amount of personal data.

All the information collected is obtained directly from you. This is usually at the point of your initial registration. The information will be collected via membership forms or by direct personal secure access to the Beacon system by members when this feature is enabled. The lawful basis for collecting and storing your information is the contractual relationship that you, as a member, have with the Ledbury & District u3a in paying your membership fee to receive services from us.

#### 3. How your data is held

The information that you supply when you become a member, or when you renew your membership, is held on the Beacon database. This is the administrative system that is controlled by Ledbury and District U3A (the Controller) and processed, provided and run as a cloud-hosted service by The Third Age Trust Ltd (the Processor). It is a secure database and all access to it is carefully controlled.

We have in place security safeguards to protect your personal information against loss or theft, as well as unauthorised access, disclosure, copying, use or modification. Security measures include measures such as encryption, which creates a secure connection with our browsers when we register and login with passwords to our online services.

Committee members and group leaders will keep all data secure, by taking sensible precautions including using strong passwords which will not be shared, except in extreme cases of need, such as illness requiring the temporary use of an approved/trusted backup person.

### 4. Access to your data

Access to your data is only allowed for u3a members who need it in order to carry out their u3a duties, including Committee Members, Group leaders and any designated sub committees. (e.g., getting in touch by post, email or telephone for reminders about events, renewals and new member recruitment). All Committee and sub-group committee members to be asked to complete a Confidentiality form.

The Leader of any group that you join may also have access to some of your data (address, telephone number, email address, landlines and mobiles plus any emergency contact information).

Committee members and group leaders will keep all data secure, by taking sensible precautions including using strong passwords which will not be shared, except in extreme cases of need, such as illness requiring the temporary use of an approved/trusted backup person.

Access to devices and locations: Committee members will only use home devices such as PCs, Apple Macs, tablets, and Smart Phones and will ensure that local extracts and copies of Beacon data used for analysis purposes, such as extracted spreadsheets in Excel or Access are kept securely under password-protected access control and deleted when no longer needed.

### 5. How your data is used

Your data is used to provide and improve the services that Ledbury & District u3a offers, including:

- Contacting you on u3a business and making you aware of u3a events and their costs.
- Communicating with you about your membership and reminding you when your annual subscription is due.
- Responding to you about specific issues that may arise during the course of your membership.
- Being used by the group leaders of any group that you join for group business.
- Communicating with you about national, local group and related activities of interest to your group.
- Supplying your name and address to the organisation that sends out Third Age Matters
- Monitoring, administering, planning, developing and improving the provision of Ledbury & District U3A activities.

We will send you messages by email, post, other digital methods and telephone to advise you of Ledbury & District u3a activities.

\*These organisations will all be subject to the same Data Protection legislation. This requires that they can only use the data for the purpose that it is supplied for and that they cannot give it to anyone else or use it for their own marketing.

### 6. Who we share you data with?

We may disclose information about you, including a limited set of your personal information to other members (unless you request otherwise) – limited to only name, email and a contact number of either landline or mobile to facilitate u3a group activities, friendships, social interaction and mutual support.

- Externally for the direct mailing of Third Age Matters, if you have chosen to subscribe
- Externally to HMRC for Gift Aid purposes where you have elected to use this facility.
- Externally to selected third parties for the provision of contracted services to enable us to deliver the service to you'
- If we have a statutory duty to disclose it for other legal and regulatory reasons.

\*Where we wish or need to share your information outside of the Ledbury & District u3a other than as above we will seek your consent in writing or by electronic means and inform you as to with whom the information will be shared and for what purpose.

### 7. How long do we keep your data for?

We need to keep your information so that we can provide our services to you. In most instances information about your membership will not normally be stored for longer than 12 months after the membership renewal date following your ceasing to be a member of the Ledbury & District u3a. The exceptions to this are instances where there may be legal or insurance circumstances that require information to be held for longer whilst the issues are investigated or resolved. Where this is the case member/s will be informed as to how long the information will be held for and when it is deleted.

### 8. How your information can be updated or corrected

To ensure the information we hold is accurate and up to date, members are able at present to correct their personal information by sending details to our Chairman - via letter, telephone, or

email. It is hoped that members will have the option with secure password access to make their own changes to Beacon in the future.

The Chairman's email is chair@ledburyu3a.org.uk.

Changes to your subscriptions to '*Third Age Matters*' published by the Third Age Trust can be made by also contacting the membership secretary.

On an annual basis you will also have the opportunity to update your information, as required, via the membership renewal process.

Should you wish to view the information that the Ledbury & District u3a holds on you, you can make this request by contacting the membership secretary – as detailed above. 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, whilst the legal time period for us to supply this is one month, we will usually respond within 14 days of the request being made.

### 9. Removal of your data

If you tell us that you no longer wish to be a member, or if you don't renew your membership by the end of November of any year following the end of your current membership, then your details are marked as lapsed. Lapsed details are then deleted from the database when they are no longer required unless for legal and regulatory reasons they need to be kept for longer.

### 10. Your rights as a data subject

You have certain rights under data protection law which are summarised below. If you wish to exercise any of these, you should contact the Membership Secretary.

- Right of access you have the right to request a copy of the information that we hold about you, which we will supply within a calendar month.
- Right of rectification you have a right to ask us to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply you have a right to restrict the processing of your data.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated decision making, including profiling you also have the right not to be subject to the legal effects of automated processing or profiling.
- Where we have asked for your consent to use your data for a specific purpose, you have the right to withdraw that consent at any time.

All of the above requests will be forwarded to the Ledbury & District u3a Membership Secretary or a third party, if a third party has been involved in the processing of your personal data.

### 11. Your Responsibilities

It is your responsibility to ensure that your details are kept up to date by notifying the Membership Secretary.

If you take a photograph for publication in the Newsletter, Third Age Matters etc., or on a website, and it contains pictures of other people, you must obtain their recorded consent to that publication.

If your role enables you to see the personal details of other members, you must treat these as confidential and not share them with anyone else, including your partner, unless that is necessary to carry out u3a business.

You should also use the BCC option when sending group emails so as not to distribute other's personal details to all of those on any email going out to multiple people.

### 12. Complaints

If you feel your data has been accidently or deliberately mis-used, you should tell the Chairman of Ledbury and District u3a so that we can put it right for you if we can.

You also have the right to complain to the Information Commissioner Office (ICO), if you feel that your complaint has not been satisfactorily resolved by us. Their contact details are: -

The Office of the Information Commissioner Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: +44 (0) 01625 545 745 Website: <u>www.ico.org.uk</u>

### 13. Availability and changes to this policy

You may request a printed copy of this policy by contacting the Membership Secretary. It will also be available on the Ledbury and District u3a website https://ledburyu3a.org.uk. This policy may change from time to time. If we make any material changes, we will make members aware of this via the Newsletter and the monthly members' meetings and by email where available.

If you have any queries about this policy, need it in an alternative format, or have any complaints about our privacy practices, please contact the Membership Secretary of the Ledbury and District u3a.

Date: 22 February 2021

Review: February 2023