

## 1 PURPOSES FOR HOLDING PERSONAL DATA

### 1.1 SCOPE AND CONTEXT FOR DATA HELD

The General Data Protection Regulation (GDPR) applies to all personal information about living individuals held either electronically or in a manual filing system.

### 1.2 TYPE OF DATA HELD AND PURPOSE FOR HOLDING

Leigh & District u3a holds and processes information about its members and others who are defined as **data subjects** under the GDPR. Leigh & District u3a processes personal information for several reasons such as administering the membership process, managing events, recording/ monitoring attendance, enabling communication based on personal interests. Leigh & District u3a may also be required by law to collect and use certain types of personal information to comply with the needs of government departments for business and other data. Leigh & District u3a's lawful basis for collecting this information is contract.

### 1.3 INDIVIDUAL RIGHTS

Leigh & District u3a takes the protection of all personal information extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal information.

## 2 COMPLIANCE WITH THE PRINCIPLES OF THE GDPR.

### 2.1 COMPLIANCE WITH 8 DATA PROTECTION PRINCIPLES

All users of personal information within Leigh & District u3a must comply with the eight Data Protection Principles. The Principles define how data can be legally processed. Processing includes obtaining, recording, holding or storing information and carrying out any operations on the data, including adaptation, alteration, use, disclosure, transfer, erasure and destruction. The eight Principles state that:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the GDPR.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage to personal data.
8. Personal data shall not be transferred to a country or territory outside of the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## 3 ROLES/RESPONSIBILITIES AND OBLIGATIONS

### 3.1 COMMITTEE RESPONSIBILITIES.

Committee members (as trustees) have a responsibility to ensure compliance with the GDPR and this policy, and to develop and encourage good information handling practices within their areas of responsibility.

### 3.2 COMPLIANCE AUTHORITY

Leigh & District u3a has nominated the site Webmaster as Information Compliance Officer, who is responsible for co-ordinating day to day data protection functions.

This includes: development and implementation of the policy; communication with the Information Commissioner when necessary; responding to individual requests for access to personal information; and framing guidelines and procedures with the aim of ensuring that all personal information processed by Leigh & District u3a complies with the GDPR.

### 3.3 COMPLIANCE TASKS ON BEHALF OF THE WEBMASTER/INFORMATION COMPLIANCE OFFICER

Each committee member within Leigh & District u3a will be responsible for working with the Webmaster/Information Compliance Officer to disseminate guidance and standard information relating to data protection to the membership.

### 3.4 INDIVIDUAL MEMBER OBLIGATION

All Members have a responsibility to ensure they process personal information in accordance with the eight Data Protection Principles and other requirements of the GDPR.

In particular, whenever a new form of processing data or an adaptation of an existing system or process is contemplated which would result in personal information being used for a different purpose than the one for which it was originally collected, those concerned must seek advice to ensure that the proposed processing complies with the requirements of the GDPR.

### 3.5 USE OF DATA IN GROUPS AND BY MEMBERS.

Group Facilitators are responsible for the processing and management of data collected and shared in the course of their group activities.

Members should only obtain or use personal information relating to third parties for approved research or other legitimate u3a-related purposes with the knowledge and express consent of an appropriate Group Facilitator or committee member. The use of personal data by members should be limited to the minimum amount of data which is reasonably required to achieve the desired objectives. Wherever possible, personal information should be de-personalised so that the data subjects cannot be identified.

### 3.6 DESTRUCTION OF DATA

All data collected outside of the activities registered above will be retained only for the duration of the project or purpose it was intended for. All such data will be destroyed or erased at the end of projects and events unless specific approval is sought from the data subjects and the compliance officer.

### 3.7 AUDIT OF DATA USAGE IN LEIGH & DISTRICT U3A

The Webmaster/Information Compliance Officer will perform periodic audits to ensure compliance with this policy and to ensure that any notification required to the Information Commissioner is completed as requested.

## 4 DATA SUBJECT RIGHTS AND FEES

### 4.1 DATA SUBJECT RIGHTS

The GDPR gives data subjects the right to access any personal information held about them by the Leigh & District u3a.

### 4.2 DATA ACCESS CHARGE

Any person can exercise this right by submitting a written/email with a subject of “Access Request”, direct to the Webmaster/Information Compliance officer. Any formal subject access request must be responded to within the 40 calendar days laid down by the GDPR, and must be recorded by the Webmaster/Information Compliance Officer as soon as they are received.

Leigh & District u3a may charge the prescribed maximum fee (currently £10) for each subject access request.

## 5 DATA COMMISSIONER

### 5.1 REGISTRATION WITH THE DATA COMMISSIONER

Leigh & District u3a does not need to formally register use of data with the Information Commissioner’s Office that it processes personal data for a number of specified purposes. Any queries relating to the operation of the Data Protection Policy and GDPR should be raised with Leigh & District u3a’s Information Compliance Officer who can be contacted by email on:

[webmaster@leighanddistrictu3a.org.uk](mailto:webmaster@leighanddistrictu3a.org.uk)

## 6 POLICY ADMINISTRATION

### 6.1 POLICY REVIEW CYCLE

This policy will be reviewed once every three years and, if necessary, amended to ensure continued compliance with the GDPR.