



# **Spelthorne U3A K2 Legitimate Interest Assessment - Issue 3.**

*(Registered Charity No. 1110936)*

This legitimate interest assessment has been compiled in order to set out the reasons why Spelthorne U3A K2 processes membership information.

## **Purpose Test.**

Spelthorne U3A K2 requests personal data in order to be able to register individuals for membership of Spelthorne U3A K2. The personal data provided will also be used to communicate with members regarding the activities of Spelthorne U3A K2 and to keep members informed regarding any groups or activities that they undertake with Spelthorne U3A K2. Members information is shared with a third party processor for the supply of the Third Age Trust publication "Third Age Matters". Each Spelthorne U3A K2 member has a choice as to whether they opt to receive this publication. Members who sign a Gift Aid declaration will have the relevant information passed to HMRC on an annual basis to enable tax to be reclaimed on their membership fee. Other than this Spelthorne U3A K2 does not share membership information outside of Spelthorne U3A K2.

Membership information is securely held and access is restricted to those who need to process data for membership purposes. Storage and processing of membership data is done in line with GDPR and safeguarding requirements.

Spelthorne U3A K2 operates with a data protection policy and privacy statement and has sought advice from the Third Age Trust in developing guidance in respect of its practice in relation to data protection.

## **Necessity Test.**

Spelthorne U3A K2 requests minimal information from potential members which includes personal details and contact details. This information is proportionate to the requirements of Spelthorne U3A K2 fulfilling its responsibilities in relation to being able to communicate effectively with its membership. Spelthorne U3A K2 would not be able to register members or process applications without the provision of a certain amount of membership information. Spelthorne U3A K2 has a duty of care to its membership and needs to retain a certain amount of personal information in order to know who its members are and which members are paid up members of Spelthorne U3A K2. This is necessary for meeting the requirements of the insurance provision for U3A members.

## **Balancing Test.**

The personal data requested are those which are needed for registering and processing individuals as members of Spelthorne U3A K2. The data requested are minimal personal data and those which are needed for communicating with members. All the data gathered are from individuals who provide the information as part of their application to join Spelthorne U3A K2 and its Groups. Membership is for a 12 month period at the end of which time members have the option as to whether or not they wish to renew as well as having the opportunity to update their personal information. The reasons for collecting personal information is explained to potential members at the point of joining. A copy of Spelthorne U3A K2's privacy statement is

available to all members who wish to have further details about how their information is used and who it is shared with.

Members who are unhappy about their data being shared with the third party processor are able to opt out of receiving those publications for which the processor is used. Spelthorne U3A K2 holds information securely and it will only be accessed by those who need to see it. Membership data will not be processed for any purpose other than in connection with an individual's membership.

Communications sent will be relevant and targeted to the individual's membership activities. Spelthorne U3A K2 members will not be sent marketing materials or information that does not relate to Spelthorne U3A K2. Spelthorne U3A K2 Group Leaders will be informed of the importance of restricting their communications with members to those which are needed for organisation of the group. All those who process membership information for Spelthorne U3A K2 will receive an induction into the requirements of GDPR and the restrictions around data processing. In addition, volunteers will be informed of the need to keep data secure and restricted to those who need access to it.

Through compilation of this assessment, Spelthorne U3A K2 considers that it has a legitimate interest to collect, hold and process membership information. This document will be held by the Committee and communicated to the membership, as required. The assessment will be reviewed every 2 years in order to ensure that legitimate interest remains the most appropriate lawful basis for gathering membership information.

*Adopted: 01/09/2023*

*Review date: 03/09/2025*