

Tenterden U3A Data Protection Policy

This policy sets out the requirements for Tenterden U3A to gather personal information in order to provide services and information about U3A activities to its membership and to manage the U3A. The policy defines how personal information will be gathered, stored and managed in line with the General Data Protection Regulation (GDPR) and is designed to ensure that Tenterden U3A:

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects itself from the risks of a data breach.

The policy will be reviewed and updated by Committee Members annually and whenever there is a change of circumstance or new guidance from U3A National Office to ensure that Tenterden U3A remains compliant with GDPR and national legislation. It should be read in tandem with Tenterden U3A's Privacy Policy.

Data protection principles

The General Data Protection Regulation requires that personal data shall be:

- (a) Processed lawfully, fairly and in a transparent way
- (b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered incompatible
- (c) Adequate, relevant and limited to what is necessary in relation to the legitimate purposes
- (d) Accurate and up to date
- (e) Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- (f) Processed in a manner that ensures security, with protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Lawful, fair and transparent data processing

Tenterden U3A collects personal information from members and applicants for membership for the purpose of communications about their involvement with the U3A. The legal basis for obtaining member information is a 'legitimate interest' in holding and processing the data in order to provide the information and services that members expect from Tenterden U3A. A Legitimate Interest Assessment has been conducted and will be reviewed annually or when circumstances change.

The forms used to request personal information will contain a privacy statement stating why the information is being requested and what the information will be used for.

If a member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

Processed for specified, explicit and legitimate purposes

Members will be told how their information will be used and the Committee of Tenterden U3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Tenterden U3A events and activities
- Enabling the direct mailing of the Third Age Trust magazines - Third Age Matters and Sources
- Sending members information about Third Age Trust events and activities
- Communicating with members about their membership and/or membership renewal
- Communicating with members about specific issues that may arise during the course of their membership

Inappropriate communications include sending U3A members marketing or promotional materials from external service providers.

Tenterden U3A will ensure that members' information is managed in such a way as to not infringe an individual member's rights, which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object.

Adequate, relevant and limited data processing

Members of Tenterden U3A will be asked to provide information that is relevant for membership purposes, which include:

- Name
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement.

If additional information is required, such as health related information, this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose for which it may be used.

If Tenterden U3A organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will be completed before this information is requested and members will be made aware that the assessment has been completed.

Photographs

We may post non-identifiable photographs of Tenterden U3A members, such as group photographs or background photographs, on the Tenterden U3A website or distribute them to members without specific prior consent. Any photo with associated information that can uniquely identify an individual will be treated as personal data and will not be published in any form without prior consent. Should a member wish at any time to remove

their consent and to have their photograph removed they should contact the Committee Member responsible (Tom Evans) to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Tenterden U3A has a responsibility to ensure members' information is kept up to date. Members will be asked to inform the Membership Secretary when any of their personal information changes. The annual membership renewal process will provide an opportunity for members to inform Tenterden U3A of any changes in their personal information.

Accountability and governance

The U3A Committee are responsible for ensuring and demonstrating that Tenterden U3A remains compliant with data protection requirements. Where consent is required for specific purposes, evidence of this consent (either electronic or paper) will be obtained and retained securely. The U3A Committee will ensure that new Members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Committee Members shall also stay up to date with guidance and practice within the U3A movement and seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee will review data protection and access to information on a regular basis as well as reviewing what data is held. When a Committee Member or IT advisor with access to or copies of Tenterden U3A personal data relinquishes their role, they will pass on that data and/or data access to their successor and delete the data and access passwords from their systems.

Secure Processing

Tenterden U3A Committee Members and the U3A IT advisor have a responsibility to ensure that data is held and processed securely by:

- Using strong passwords to protect the data and access to them
- Not sharing passwords
- Restricting access to member information to the IT advisor and those on the Committee who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain or access personal information
- Using password protection and secure cloud systems when sharing data between Committee Members and/or the IT advisor
- Maintaining firewall security on their laptops or other devices that access or store personal information.

Subject Access Request

Tenterden U3A members are entitled to request access to the information about them that is held by the U3A. Requests should be made in writing to the Membership Secretary. Requests will be formally acknowledged and dealt with within no more than thirty days unless there are exceptional circumstances as to why the request cannot be granted. Tenterden U3A will provide a written response detailing all information held on the member. A record will be kept of the date of the request and the date of the response.

Data Breach Notification

If a data breach occurs action will be taken to minimise the harm. All Committee Members will be made aware that a breach has taken place and how the breach occurred. The Committee will seek to rectify the cause of the breach as soon as possible and to prevent any further breaches. The Chair of the U3A will notify National Office of the breach within 24 hours of the breach's discovery. The Chair and National Office will review the seriousness of the breach, the action to be taken and the possible need to notify the Information Commissioner's Office. The Committee will also contact the U3A members affected to inform them of the breach and actions taken to resolve it.

If a U3A member feels that there has been a breach by the U3A, a Committee Member will ask them to provide an outline of the breach. If the initial contact is by telephone, the Committee Member will request an email or a letter detailing the concern. The alleged breach will be investigated by Committee Members who are not implicated. If the Committee needs support or if the breach is serious they will notify National Office. The U3A member will be informed that they may report their concerns to National Office if they are not satisfied with the response from Tenterden U3A.

All breaches will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

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