

Torbay U3A Data Protection Policy

The General Data Protection Regulation 2018 identifies key data protection principles with which Torbay U3A must comply :

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner .

Torbay U3A requires personal information from members in order to administer their membership and to provide communications about U3A activities. The lawful basis for obtaining member information is to manage the contractual relationship that Torbay U3A has with its members. The forms used to obtain this personal information contain a privacy statement describing the purpose and use of the information. Members will be asked to provide specific consent for certain processing purposes and will be informed as to how they may withdraw consent previously provided. Where consent is withdrawn the request will be acted upon promptly and the member will be notified when the action has been taken.

Principle 2 - Personal data must be 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 purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

On the subscription form members are advised how their information will be used. The Committee of Torbay U3A will endeavour to ensure that member information is never used inappropriately. Appropriate use of information provided by members includes:

- ***Communication with members about U3A events and activities***
- ***Group Leaders contacting group members about group activities***
- ***Subject to consent, adding members addresses to the direct mailing database for the Third Age Trust magazines;***
- ***Evidence of this consent to receive communications will be retained***
- ***Contacting members about their membership and/or renewal of their membership***

Torbay U3A Committee will not allow inappropriate communication such as sending its members marketing and/or promotional materials from external service providers.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

For the purposes of membership records, only name, address, telephone number, email address (optional) and gift aid eligibility are recorded.

Where additional information is required for any purpose such as security identification for the organisation of a trip, members must be notified why this information is required and their consent to use of the information obtained. This information should not normally be retained after such usage.

As photographs are classified as personal data members will be asked to step out of shot if they don't wish to be in group photographs. Otherwise consent should be obtained from members for photographs to be taken and members should be told where photographs will be displayed. A member may withdraw their consent and have their photograph removed by contacting the appropriate Committee member.

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Members may make changes to their personal data by notifying the Membership Secretary at any reasonable time. Any such requests will be actioned promptly on receipt.

On renewal of subscription each year members will be able to confirm or change their information.

Members may request access to the information that is held by Torbay U3A by writing to the Membership Secretary who will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response which should be as soon as expedient and certainly no later than one month.

Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

The Committee will ensure that Torbay U3A complies with data protection requirements and can confirm compliance; it will also ensure that members' rights regarding their information are safeguarded including rights of access, rectification, erasure, and the right to be informed.

When Committee Members and / or Group Leaders relinquish their roles, they should pass on data to their successors and/or delete it.

Principle 6 - Personal data must be processed in accordance a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Membership data will be stored on computer in an encrypted format protected by a non-trivial password. The database file will be held in secure "cloud" storage which will provide backup security, and regular additional backups will also be taken. All copies will be password protected.

Access to the database is restricted to the Membership Secretary, or if necessary an agreed deputy.

Members of Committee may for specific purposes be granted access to a copy of a subset of the data, but may not access or modify the full membership database.

Any breach, or suspected breach, of data security will be investigated immediately and corrective action taken. Any member affected must be kept informed and a record kept of actions taken. Except in minor cases, National Office should be contacted for advice to ensure an appropriate response.

The Committee will review data protection and access to information on a regular basis.

*The operational implementation of this Data Protection policy, and the associated Privacy Policy, is detailed in the document **Torbay U3A – Recording, Usage & Protection of Data** as approved by Committee on 7th December 2017.*

Data Protection Policy approved by Torbay U3A Committee 7 June 2018