

Privacy Policy

1 Document control

1.1 Approval

Date approved	25/01/21
Approved by	Woodhall Spa U3A Committee

1.2 Version history

Version	Date	Author	Change summary
1	20/02/20		Taking U3A-KMS-POL-004 from National Office Feb 2020 & Revisions after subcommittee.
2	19/01/2021	C Sefton	To reflect updated Policy from u3a Office namely: Purpose of document in Introduction; replace personal information with personal data; define data controller; include reference to HMRC ; include sections on Your Rights and Third Party links; headings changed to reflect the changes above.

2 Introduction

Woodhall Spa U3A (we or us) treats your privacy rights seriously.

This privacy policy sets out how we will collect and use your 'personal data'. Where we use the words **personal data** we use these words to describe information that is about you and which identifies you.

This policy describes:

- who is responsible for the personal data that we collect about you;
- the personal data we collect about you;
- how we will use it;
- who we may disclose it to; and
- your rights and choices in relation to your personal data

This is to make sure you have a full picture of how we collect and use your personal data.

3 Policy

3.1 Who is responsible for the personal data that we collect?

Woodhall Spa U3A Executive Committee is the data controller for the purposes of data protection law, in respect of your personal data collected and used by us.

3.2 What personal data do we collect?

When you express an interest in becoming a member of Woodhall Spa U3A you will be asked to provide certain information. This includes:

- your name
- postal address
- email address
- telephone number/s
- Gift Aid declaration

3.3 How do we collect this personal data?

All the data collected is obtained directly from you. This is usually at the point of your initial registration or renewal. The information will be collected via membership forms or by writing to the Membership Secretary.

The lawful basis for collecting and storing your information is due to the contractual relationship that you, as a member, have with the U3A.

3.4 How do we use 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.

We use your personal data:

- To provide our U3A activities and services to you
- For administration, planning and management of our U3A
- To communicate with you about your group and U3A activities
- To monitor, develop and improve the provision of our U3A activity
- To collect Gift Aid
- For delivery of the Trust publication – Third Age Matters

We'll send you messages by email, other digital methods, post and telephone to advise you of U3A activities.

You have the right to opt out of some of the above communication methods by selecting the appropriate box on the Membership/Renewal form or by writing to the Membership Secretary.

3.5 Who do we share your personal data with?

We may disclose information about you, including your personal data

- Internally - to committee members and group convenors – as required to facilitate your participation in our U3A activities;
- Externally – for products or services such as email distribution or direct mailing for the Trust magazine – Third Age Matters. The magazine is distributed by a third party processor and your information is shared with the distribution company via a secure online portal. Should you not wish to receive the magazine or the Newsletter please advise the Membership Secretary in writing.
- If we have a statutory duty to disclose it for legal and/or regulatory reasons. In this instance we will seek to obtain your consent. Information would be shared without consent where there were serious safety concerns and it was felt to be in your or the U3A's best interests to disclose information.

3.6 How long do we keep your personal information?

We need to keep your information so that we can provide our services to you. In most instances information about your membership will not be stored for longer than 12 months although HMRC requires us to store Gift Aid information for 6 years.

The exceptions to this are instances where there may be financial, 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.

3.7 Your rights

You have certain rights with respect to your personal data. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights.

	Summary of your rights
Right of access to your personal data	You have the right to receive a copy of your personal data that we hold about you and information about how we use it, subject to certain exemptions. You can do this by writing to the Membership Secretary.
Right to rectify your personal data	<p>You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete.</p> <p>To ensure the information we hold is accurate and up to date, member's need to inform the U3A as to any changes to their personal information. You can do this by writing to the Membership Secretary.</p> <p>On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process. Should you wish to view the information that the U3A holds on you, you can make this request by writing to the Membership Secretary. 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 we will usually respond within one month of the request being made.</p>
Right to erasure of your personal data	<p>You have the right to ask that your personal data be deleted in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used; • if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal data; • if you object to the use of your personal data (as set out below); • if we have used your personal data unlawfully; or • if your personal data needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal data	<p>You have the right to suspend our use of your personal data in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where you think your personal data is inaccurate but only for so long as is required for us to verify the accuracy of

	Summary of your rights
	<p>your personal data;</p> <ul style="list-style-type: none"> • the use of your personal data is unlawful and you oppose the erasure of your personal data and request that it is suspended instead; • we no longer need your personal data, but your personal data is required by you for the establishment, exercise or defence of legal claims; or • you have objected to the use of your personal data and we are verifying whether our grounds for the use of your personal data override your objection.
Right to object to the use of your personal data	<p>You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:</p> <ul style="list-style-type: none"> • where you have grounds relating to your particular situation and we use your personal data for our legitimate interests (or those of a third party); • if you object to the use of your personal data for direct marketing purposes; and • where we use your personal data to take a decision which is based solely on automated processing where that decision produces a legal effect or otherwise significantly affects you.
Right to withdraw consent	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal data.</p>
Right to complain to the relevant data protection authority	<p>You have the right to complain to the relevant data protection authority, which is in the case of us, the Information Commissioner's Office (ICO), where you think we have not used your personal data in accordance with data protection law. The ICO's contact details are:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p>

3.8 How do we store your personal information

Woodhall Spa U3A has in place a range of security safeguards to protect your personal information against loss or theft, as well as unauthorised access, disclosure, copying, use or modification. Security measures include use of cloud storage and firewalls. Your

membership information is held securely and accessed by Committee Members and Group Convenors – as appropriate.

3.9 Third party links

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your personal data. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

3.10 Availability and changes to this policy

This policy is available on Woodhall Spa U3A's website. This policy may change from time to time. Members will be informed via the newsletter and the monthly meetings when any material changes are made to Woodhall Spa U3A's policies and procedures.

This policy will be reviewed annually by Woodhall Spa U3A Committee.

3.11 Contact

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 Secretary of Woodhall Spa U3A.