

# Wymondham U3A Data Protection Policy

## Scope of the policy

This policy applies to Wymondham U3A. The policy details how personal data will be collected, stored and used. The policy will be regularly reviewed to ensure compliance with the General Data Protection Regulation.

## The Purpose of this policy.

The purpose of this data protection policy is to ensure that Wymondham U3A:

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

## General guidelines for users of personal data

It is the policy of Wymondham U3A that:

- Only authorized users may have access to personal data.
- Training and guidance will be given to authorized users of personal data.
- All users of personal data should keep that data secure by taking sensible precautions and following this policy.
- Only strong passwords are to be used and they should never be shared.
- Data shall not be collected, stored, or used without the owner's consent.
- Personal data should accurate and relevant at all times.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

## Data protection principles

The General Data Protection Regulation has identified 6 key data protection principles:

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

Principle 2 - Personal data must only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

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

Principle 4 – Personal data held should be accurate and kept up to date and irrelevant or inaccurate data is erased or rectified without delay.

Principle 5 – Personal data must not be kept in a form which permits identification of data subjects for longer than is necessary.

Principle 6 - Personal data must be processed in a manner that ensures appropriate security including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

## Lawful, fair and transparent data processing

Wymondham U3A requests personal data from applicants in order to function. Application forms and the Wymondham Data Privacy Notice will inform applicants as to why the data is being requested and how it will be used. The lawful basis for obtaining membership data is the contractual relationship that Wymondham U3A has with its members. Members will be asked to provide their consent to use their personal data.

## Processed for specified, explicit and legitimate purposes

Members will be informed how their personal data will be used. Appropriate use of personal data will be:

- To record their memberships.
- To provide them with activities including holidays, trips and events.
- For administration and planning.
- To record their membership to groups.
- To communicate them.
- To monitor, develop and improve our services.
- To inform them of external events and activities.
- To provide them with Third Age Trust magazines.

Wymondham U3A will ensure that all authorized users of personal data are made aware of what would be considered inappropriate. An example of inappropriate use of data would be sending Wymondham U3A members marketing and/or promotional materials from external service providers.

Wymondham U3A will ensure that personal data is handled in such a way as to not infringe the rights of its members which will 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 object

## Adequate, relevant and limited data processing

Members of Wymondham U3A will only be asked to provide data that is relevant for membership purposes. This will include:

- Title
- Name
- Address
- Email address
- Telephone number
- Your subscription preferences
- Gift Aid eligibility
- Who they share an address with

## Photographs

Photographs are classified as personal data. Consent will be obtained from members for photographs to be taken and used. Those who do not consent will be asked to place themselves out of shot. Members may remove this consent at any time and should they wish for a displayed photograph to be removed they should apply to the Wymondham U3A Data Controller by using the contact facility at [Wymondham U3A Contacts](#).

## Accuracy of data and keeping data up to date

Wymondham U3A has a responsibility to ensure members' data is accurate and relevant. Members will be reminded periodically to let the membership secretary know if ~~any~~ of their personal data changes. In addition the annual membership renewal process will provide an opportunity for members to inform Wymondham U3A Data Controller by using the contact facility at [Wymondham U3A Contacts](#) of any changes in their personal data.

## Accountability and governance

Wymondham U3A Committee are responsible for ensuring that Wymondham U3A remains compliant with data protection and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be collected and stored securely. The U3A Committee will ensure that any new Committee members receive adequate training. Wymondham U3A will also ensure that all users of personal data are made aware of their responsibilities. Committee Members shall remain up to date with guidance and practices within the U3A movement and shall seek additional input from the Third Age Trust National Office when appropriate. The Committee will continue to review data protection regulations, monitor what personal data is held and ensure that is still accurate and relevant. Those who have access to personal data will also be monitored and if their access is revoked, they will be required to return any personal data held or to delete it.

## Secure Processing

Wymondham U3A has a responsibility to ensure that data is held securely and used appropriately. This will include:

- The use of strong passwords.
- Not sharing passwords.
- Restricting access to those that need it.
- Using password protection on devices that contain personal data.
- Using password protection and encryption or secure cloud systems when sharing data.
- Only using devices that have up to date operating systems with antivirus and firewall security enabled.
- Not using devices accessible to the public.

## Subject Access Request

U3A members may request access to their personal data at any time. Written requests should be sent to the Data Controller by using the contact facility at [Wymondham U3A Contacts](#) who will acknowledge and deal with within one month unless there are exceptional circumstances as to why the request cannot be fulfilled. A record shall be kept of the date of the request and the date of the response.

## Data Breach Notification

Data breaches will be subject to a full investigation, records will be kept and all those involved will be informed of any outcome. If a data breach should occur action shall be taken to mitigate any harm or further breaches. The Chair of the U3A will contact National Office within 24 hours and if necessary the Data Commissioner's Office. Any affected members will be informed of the data breach and the steps being taken.

If a member contacts Wymondham U3A Data Controller to say that they feel there has been a data breach they will be asked to provide details in written form such as an email or a letter. Members can contact the Third Age Trust National Office if they are not satisfied with the response from Wymondham U3A.

*This policy was last amended in May 2020*

*Next Policy review date: May 2021*