

PRIVACY POLICY

PURPOSE

High Wycombe and District u3a (hereafter ‘the u3a’) treats its members’ privacy rights seriously. This privacy policy sets out how we will deal with your *personal data*, that is, information that is about you and could identify you.

SCOPE

To ensure members are clear about how their data are collected and used, the information collected and how it is managed is explained in this document. Members’ rights and choices in relation to their data are also included.

In relation to the u3a website, the policy applies to both our members and visitors to the site.

RESPONSIBILITY

The Committee of Trustees of the u3a is the data controller for the purposes of data protection law in respect of the personal data collected from the members.

HOW DO WE STORE YOUR PERSONAL DATA?

Each member’s personal information is recorded and stored on the Beacon System database operated by Third Age Trust Trading Ltd (TATTTL). Access to the records is strictly controlled by our Beacon Administrator, the nominated Committee Member who manages the system. Access is password protected and passwords are never shared.

Other Committee Members have access rights appropriate to their role, for example, the membership information is accessed in its entirety only by the Membership Secretary and the deputy (when necessary) to maintain the membership list, by the Secretary for communication purposes, and by the Treasurer for the Gift Aid Claim and for the Audit. Group Convenors access is restricted to read-only access to their own groups’ information.

Any paper records are treated with care and kept securely. They are maintained in accordance with this policy.

WHAT PERSONAL DATA DO WE COLLECT?

When you express an interest in becoming a member of the u3a you will be asked to provide certain information for the purpose of communicating with you. This includes:

- Name
- Home address
- Email address
- Telephone number
- In Case of Emergency (ICE) numbers (optional)
- Gift Aid entitlement
- Membership of other u3a branches
- Detail of couples who just receive one newsletter
- Subscription preferences (e.g. choice to receive the national magazine)

- On-line activity information (to the extent that it constitutes personal data)

Some technical information is collected through your internet browser or electronic device.

Certain information is collected by most websites or automatically through your electronic device, such as your IP address, screen resolution, operating system and version., internet browser type and version, electronic device manufacturer and model, language, time of the visit, pages visited.

- Technical information, using cookies and on-line tracking.

Cookies are pieces of information stored directly on the device you are using to access our website. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the website and the pages visited.

If the u3a is provided with personal data concerning *third parties*, it will be used in accordance with this policy. The provider/member confirms that consent to share third party data has been agreed, and the party are aware of the content of this policy.

HOW DO WE USE THE PERSONAL DATA WE COLLECT?

In order to ensure our compliance with the data protection legislation, we can only use your personal data if there is a legal basis to do so.

Your personal information is obtained directly from you, usually at the point of your initial membership registration. The information will be collected via a membership registration form.

Under data protection law, u3a can only use your data if there is a legal basis to do so.

Examples of where we have a legal basis to process your personal data includes when:

- We have your **consent**
- To implement the **contract** we have with you
- We must comply with a **legal obligation**
- It is in our **legitimate interests** to process your personal data

The reasons we use your personal data and the legal basis in each case are shown the Table below.

Purpose	Legal Basis
To set up your membership information on the Beacon system	Contract Legitimate Interests
To manage membership information on the Beacon system	Contract Legitimate Interests
To communicate with you about our u3a products, services, activities and events	Contract Legitimate Interests
To administer, plan and manage our u3a	Legitimate Interests
To monitor, develop and improve the provision of our u3a activity	Legitimate Interests
To communicate with you about Trust products, services, activities and events	Contract Legitimate Interests
To deliver Trust publications	Contract Legitimate Interests
To share with the Third Age Trust and TATTL to manage, develop and make improvements to the Beacon system	Legitimate Interests
To comply with any legal or regulatory obligations including in connection with a court order	Legal obligation
To manage any issues, complaints, feedback and enquiries	Consent Contract Legitimate Interests

- **Photographs** constitute personal data and consent is needed to take and display them. Where group photographs are being taken it is sufficient to ask for consent beforehand and those who do not wish to be included to move out of shot. What the photograph will be used for should be explained.

If a member subsequently objects, by contacting the Committee in writing, then the photograph will be withdrawn from display.

DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

- Internally - Committee Members and group Convenors – as required to facilitate your participation in our u3a activities
- Externally – the Third Age Trust and TATTL
- Externally – our service providers and business partners
- If we have a statutory duty to disclose it for other legal 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.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will keep your personal data for different periods depending on the nature of the information, the purpose for which it was collected, or any business reason. In most instances information about your membership will not be stored for longer than 24 months after your membership has lapsed.

Examples of exceptions to this are:

- The Treasurer must keep records of the financial information which includes the Gift Aid Claim for six years.
- Where there are legal proceedings which require information to be held for longer.

HOW YOUR PERSONAL DATA CAN BE UPDATED OR CORRECTED

Should you wish to view the record that the u3a has filed for you, it can be requested from the Membership Secretary by telephone (number in your Newsletter) or email, via the u3a website.

We will usually respond within one month of the request being made.

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 another individual or for legal, investigative or security reasons.

To ensure the information we hold is accurate and up to date, members need to inform the u3a when there are changes to their relevant circumstances or choices. You can notify us of changes at any time. You also have the opportunity to update your information annually via the membership renewal process.

For Gift Aid, it is essential that any change to the declaration is notified promptly, and your address details are up to date.

YOUR RIGHTS CONCERNING YOUR PERSONAL DATA

You have certain rights with respect to your personal data. These apply only in certain circumstances and are subject to exemptions.

The Table below summarises these rights.

	Summary of your rights
<i>Right of access to your personal data</i>	You have the right to <i>receive a copy</i> of your personal data that we hold and information about how we use it (exemptions apply)
<i>Right to rectify your personal data</i>	You have the right to ask us to <i>correct</i> your personal data that we hold where it is incorrect or incomplete
<i>Right to erasure of your personal data</i>	You have the right to ask that your personal data <i>be deleted</i> in certain circumstances - Where it is <i>no longer necessary</i> in relation to the purposes for which it was collected, or If you <i>withdraw your consent</i> and there is no legal ground for which we rely on for the continued use of your data If you <i>object to the use</i> of your data (see next row) If we have used your data <i>unlawfully</i> If your data needs to be erased <i>to comply with a legal obligation</i>
<i>Right to restrict the use of your personal data</i>	You have the right to <i>suspend our use</i> of your personal data in certain circumstances, e.g. Where you think it is inaccurate, but only for as long as is needed for us to verify its accuracy Its use is unlawful and you oppose the erasure and request its suspension instead We no longer need it but it is required by you for a legal claim You have objected and we are verifying whether our grounds for use override your objection
<i>Right to data portability</i>	You have the right to obtain your data in a structured, commonly used and machine-readable format and for it to <i>be transferred</i> to another organization, where technically feasible This right only applies where we rely on the legal bases of consent, or performance of contract, and when carried out by electronic means
<i>Right to object to the use of your data</i>	You have the right to object to the <i>use of your data</i> under certain circumstances and subject to certain exemptions., e.g. If you object to its use for direct marketing purposes
<i>Right to withdraw consent</i>	You have the right to withdraw your consent at any time
<i>Right to complain to the data protection authority</i>	You have the right to complain to our data protection authority where you think we have not used your data in accordance with the law. Information Commissioners Office Wycliffe House, Water Lane, WILMSLOW, Cheshire, SK9 5AF

AVAILABILITY OF THIS POLICY

This policy is available on the High Wycombe and District u3a Website and in the Policy File available at monthly meetings.

CONTACT

If you have any queries about this policy or have any complaints about our privacy practices, contact the u3a Committee. Details are on our Website and in the Newsletter.