

Privacy Policy for Great Glen u3a

1. Statement

Great Glen u3a is a learning co-operative and membership charity which enables members in their third age to share educational, creative and leisure activities. Members of each u3a draw upon their knowledge, skills and experience to teach and learn from each other (peer to peer learning). Great Glen u3a treats your privacy rights seriously. This privacy policy sets out how we will deal with your 'Personal Data' that is, information that could identify, or is related to the identity of, an individual. In this policy, we use the term, personal information to refer to personal data.

2. Scope of the policy

The policy describes:

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

We are the data controller for the purposes of data protection law, in respect of your personal data collected and used by us.

The word Trust means The Third Age Trust (charity number 288007)

The word TATTL means Third Age Trust Trading Limited (company number 11899419) and

The Beacon System means the membership data system operated by TATTL.

3. What personal information do we collect and use?

We collect and use personal data about you for the purpose of communicating with you as representative of your u3a.

When you apply to become a member of Great Glen u3a you will be asked to provide certain information:

- Name
- Home Address
- Email Address
- Signature
- Telephone Number (s)
- Subscription preferences for u3a magazine
- Gift aid status
- In case of emergency contact details
- Details of membership of another u3a
- Name of another member who is your joint partner in u3a

4. How do we collect this personal information?

All the information collected is obtained directly from you. The information will be collected via forms and in the course of communications between you and us (including by phone, email or otherwise). The lawful basis for collecting and storing your information is due to the legitimate interest that Great Glen u3a has in communicating with you as a member. 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.

If you provide information about a third party then you confirm that you have the consent of the third party to share such personal information with you and that you have made the third party aware of this Privacy Policy.

5. How do we use your personal information?

We use your personal data for a variety of different purposes during the course of providing services to you. The purposes for which we use your personal data are set out below. Under data protection law, we can only use your personal data if we have a legal basis to do so. Examples of where we have a legal basis to process your personal data, include when:

- we have your consent;
- it is needed to enter into or perform a contract we have with you (or to take steps at your request prior to entering into that contract);
- it is necessary to comply with a legal obligation; or
- it is in our legitimate interests to process your personal data.

We use your personal information under a legal basis based on both contract and /or legitimate interests (see below for information on legitimate interests):

- To set up and manage your membership
- To manage membership information on the Beacon system
- To share with the Trust and TATTL to manage, develop and make improvements to the Beacon system
- For administration, planning and management of our u3a
- To monitor, develop and improve the provision of our u3a activity
- To communicate with you about our u3a activities and service
- To communicate with you about your group activities
- For delivery of the Trust publication – Third Age Matters (with your consent, see below)
- To manage any issues, complaints, feedback and enquiries
- To comply with any legal or regulatory obligation

We do not use your personal data to make any automated decisions that might affect you.

6. Who may we disclose your personal information to ?

We may share your personal information with:

- the Third Age Trust
- Third Age Trust Trading Limited
- HMRC (for gift aid purposes only), and
- our service providers and business partners.

If we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal data held by us will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our agreements concerning you (including agreements between you and us).

7. How long do we keep your personal information ?

We need to keep your information so that we can provide our services to you. We will keep your personal data for different periods depending on the nature of the information, the purpose for which it was collected, any legal obligation and/or business reason to retain. The exceptions to this are instances where there may be legal or insurance circumstances that require information to be held for longer e.g. the requirements of HMRC.

8. 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.

9. Availability and changes to this policy

This policy is available on the Great Glen u3a website. This policy may change from time to time. If we make any material changes, we will make members aware of this through the newsletter.

10. Contact

If you have any queries about this policy, please contact us at chairman@greatglenu3a.co.uk.

11. 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 the personal data that we hold about you and information about how we use it, subject to certain exemptions.
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, members need to inform the u3a of any changes to their personal information. You can do this by contacting the Membership Secretary, membership@greatglenu3a.co.uk.</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 contacting 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 your personal data; • 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 data portability	<p>You have the right to obtain your personal data in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>The right only applies:</p> <ul style="list-style-type: none"> • to personal data you provided to us; • where we rely on the following legal bases: <ul style="list-style-type: none"> • consent; or • for the performance of a contract; and • when the use of your personal data is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal data	You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:

	Summary of your rights
	<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	You have the right to withdraw your consent at any time where we rely on consent to use your personal data.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is in our case, 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: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

13. Legitimate Interest Assessment

This legitimate interest assessment has been compiled in order to set out the reasons why Great Glen u3a processes membership information. It is to be read in conjunction with the Data Protection Policy.

There are three tests which are used to assess if there is legitimate interest – purpose, necessity and balance.

1. Purpose Test

Great Glen u3a requests personal information in order to be able to register individuals for membership of Great Glen u3a using the Beacon system. The personal information provided will also be used to communicate with members regarding the activities of Great Glen u3a and the Third Age Trust, and to keep members informed regarding any groups or activities that they undertake with Great Glen u3a. Member data is used to enforce or apply the agreements between us and members and to manage any issues, complaints, feedback or enquiries. Member information is shared with a third-party processor for the supply of the Trust publication – Third Age Matters (TAM). Each member has a choice whether to opt to receive this publication. Other than this, Great Glen u3a does not share membership information outside of the u3a. Membership information is securely held and access is restricted to those who need to process data for membership purposes. Storage and processing of membership data is done in line with GDPR and safeguarding requirements. Great Glen u3a operates with a data protection policy and privacy policy and has sought advice from the Third Age Trust in developing guidance in respect of our practice in relation to data protection.

2. Necessity Test

Great Glen u3a requests minimal information from potential members which includes personal details and contact details. This information is proportionate to the requirements of the u3a fulfilling its responsibilities in relation to being able to communicate effectively with its membership. Great Glen u3a would not be able to register members or process applications without the provision of certain membership information. Great Glen u3a has a duty of care to its membership and needs to retain a certain amount of personal information in order to know who its members are, and which members are paid up members of the u3a. This is necessary for meeting the requirements of the insurance provision for u3a members.

3. Balancing Test

The personal data requested are what are needed for registering and processing individuals as members of Great Glen u3a. The data requested are minimal personal data and what are needed for communicating

with members. All the data gathered are from individuals who provide the information as part of their application to join Great Glen u3a. Membership of Great Glen u3a must be renewed each year at which time members have the option whether to renew as well as having the opportunity to update their personal information. The reasons for collecting personal information are explained to potential members at the point of joining. A copy of Great Glen u3a's privacy policy is available to all members on the website. Members who are unhappy about their data being shared with third party processors can opt out of receiving those publications. Great Glen u3a holds information securely and it will be accessed by those who need to see it only. Membership data will not be processed for any purpose other than in connection with an individual's membership. Communications sent will be relevant and targeted to the individual's membership activities. Great Glen u3a Group Leaders will be informed of the importance of restricting their communications with members to that which is needed for organisation of the group. All those who process membership information for the u3a will receive an induction into the requirements of GDPR and the restrictions around data processing.

Summary

Through the compilation of this assessment Great Glen u3a considers that it has a legitimate interest to collect, hold and process membership information. This document will be held by the Committee and communicated to the membership, as required. The assessment will be reviewed every year in order to ensure that legitimate interest remains the most appropriate lawful basis for gathering membership information.

This policy was adopted on: 29 September 2020

Signed: 

Committee Role: CHAIRMAN

Print Name: ROBERT MANSFIELD

Policy Review Date: October 2021