

# Penmaenmawr & District U3A

## Data Protection Policy

### **Definitions within this document.**

All references to 'this U3A' refer to Penmaenmawr & District U3A, likewise all references to 'the or our Committee' refer to the Committee of Penmaenmawr & District U3A, and references to the Membership Secretary refer to the Membership Secretary for the time being of Penmaenmawr & District U3A.

### **Scope of the policy**

This policy applies to the work of this U3A. The policy sets out the requirements that this U3A has to gather information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by this U3A's Committee to ensure that we are compliant. This policy should be read in tandem with this U3A's Privacy Policy.

### **Why this policy exists**

This data protection policy ensures this U3A:

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

### **General guidelines for committee members and group conveners**

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the this U3A's members.
- This U3A will provide training to committee members and group conveners and to help them understand their responsibilities when handling data.
- Committee Members and group conveners and should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Data should not be shared outside of the U3A unless with prior consent and/or for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided to the distribution company for the Trust publications.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be support from the Third Age Trust where uncertainties or incidents regarding data protection arise.

## **Data protection principles**

The General Data Protection Regulation identifies key data protection principles:

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

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.

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;

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;

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;

Principle 6 - Personal data must be processed in 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.

## **Lawful, fair and transparent data processing**

This U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with the U3A. The forms used to request personal information will contain a privacy statement informing potential members and members as to why the information is being requested and what the information will be used for. The lawful basis for obtaining member information is due to the contractual relationship that the U3A has with individual members. In addition members will be asked to provide consent for specific processing purposes. U3A members will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received they will be acted upon promptly and the member will be informed as to when the action has been taken.

## **Processed for specified, explicit and legitimate purposes**

Members will be informed as to how their information will be used and the Committee of this U3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about this U3A's events and activities

- Group conveners and communicating with group members about specific group activities
- Consent will be sought in order to add members details to the direct mailing information for the Third Age Trust magazines – Third Age Matters and Sources
- Sending members information about Third Age Trust events and activities
- Communicating with members about their membership and/or renewal of their membership
- Communicating with members about specific issues that may have arisen during the course of their membership

This U3A will ensure that group conveners and are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending U3A members marketing and/or promotional materials from external service providers, unless the member had so requested it, or it was relevant to some specific group activity.

This U3A will ensure that members' information is managed in such a way as to not infringe an individual members rights which 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 data portability
- The right to object

### **Adequate, relevant and limited data processing**

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

- Name
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement

Where additional information may be required such as health related information this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose tfor which it will be used.

Where this U3A organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

## **Photographs**

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't wish to be in the photograph. Otherwise consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the Membership Secretary to advise that they no longer wish their photograph to be displayed.

## **Accuracy of data and keeping data up-to-date**

This U3A has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform this U3A as to any changes in their personal information.

## **Accountability and governance**

The U3A Committee is responsible for ensuring that the U3A remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The U3A Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. This U3A will also ensure that group conveners are made aware of their responsibilities in relation to the data they hold and process. Committee Members shall also stay up to date with guidance and practice within the U3A movement and shall seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held. When Committee Members and Group Conveners relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

## **Secure Processing**

Our Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords
- Committee members not sharing passwords
- Restricting access of sharing member information to those on the Committee who need to communicate with members
- Using password protection on laptops and PCs that contain personal information
- Using password protection or secure cloud systems when sharing data between committee members and/or group conveners
- Using firewall security on Committee Members' laptops or any other devices on which sensitive data is held

## **Subject Access Request**

U3A members are entitled to request access to the information that is held by this U3A. The request needs to be received in the form of a written request to the Membership Secretary. On receipt of the request, the request will be formally

acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. This U3A 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.

### **Data Breach Notification**

Were a data breach to occur action shall be taken to minimise the harm. This will include ensuring that all our Committee Members are made aware that a breach has taken place and how the breach occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of the U3A shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chair and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Committee shall also contact the relevant U3A members to inform them of the data breach and actions taken to resolve the breach.

Where a U3A member feels that there has been a breach by the U3A, a committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the committee member will ask the U3A member to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by members of the committee who are not in any way implicated in the breach. Where the committee needs support or if the breach is serious they should notify National Office. The U3A member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from the U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Adopted by the Committee 26 June 2018.

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## Privacy Policy.

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This U3A treats your privacy rights seriously. This privacy policy sets out how we will deal with your personal information.

### **What personal information do we collect?**

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

- your name
- home address
- email address
- telephone number
- your newsletter delivery preference

### **How do we collect this personal information?**

All the information collected is obtained directly from you, usually at the point of your initial registration. The information will be collected via membership forms or online contact forms. The lawful basis for collecting and storing your information is due to the contractual relationship that you, as a member, have with the U3A. 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.

### **How do we use your personal information?**

We use your personal information:

- To provide our U3A activities and services to you
- For administration, planning and management of our U3A
- To communicate with you about group activities
- To monitor, develop and improve the provision of our U3A activity

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

### **Who do we share your personal information with?**

We may disclose information about you, including your personal information

- Internally - to committee members and group conveners - as required to facilitate your participation in our U3A activities;

- Externally – with your consent for products or services such as direct mailing for the the Trust magazines – Third Age Trust and Sources;
- If we have a statutory duty to disclose it for other legal and regulatory reasons.

Where we need to share your information outside of the U3A we will seek your consent and inform you as to who the information will be shared with and for what purpose.

### **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 15 months. The exceptions to this are instances where there may be 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.

### **How your information can be updated or corrected**

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 contacting the membership secretary. 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 14 days of the request being made.

### **How do we store your personal information?**

We have 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 technological measures such as Secure Socket Layer (SSL) encryption, which creates a secure connection with your browser when you register and login into our online services. (You need to check the security settings of your website and consider how you store and delete information that is collected via the website) Your membership information is held on a spreadsheet and accessed by Committee Members and Group Conveners – as appropriate.

### **Availability and changes to this policy**

This policy is available from the Secretary or the Membership Secretary. This policy may change from time to time. If we make any material changes we will make members aware of this via the Newsletter and the monthly members' meetings.

### **Contacts**

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 Membership Secretary or the Secretary, whose contact details are on our website [www.penmaenmmawru3a.org.uk](http://www.penmaenmmawru3a.org.uk) and are given in our Monthly Newsletter.

Adopted by the Committee 26 June 2018

