

Malmesbury and District U3A

Privacy Policy

Malmesbury and District U3A (hereafter 'the U3A') treats all member privacy rights seriously. This privacy policy sets out how members' personal information is dealt with; that is, information that could identify, or is related to the identity of, an individual. It sets out to describe the U3A's practice that is governed by the General Data Protection Regulations (hereafter 'GDPR') outlined separately in the U3A's Data Protection Policy.

WHAT PERSONAL INFORMATION IS ESSENTIAL FOR THE U3A TO HAVE?

When a member expresses an interest in becoming a member of the U3A they will be asked to provide certain information. The essential information is effectively part of the contract that enables the U3A to provide you with the service and benefits of membership. It includes:

- Name.
- Home address.
- Email address (if available).
- Preferred telephone number (land-line or mobile)

WHAT OTHER INFORMATION WILL THE U3A SEEK?

Other information is not essential to your membership, so is collected only with your consent. This information facilitates your full participation in the U3A's activities:

- Alternative telephone number (mobile or land-line), if available.
- Local Newsletter and Bulletin preferences
- National Third Age Trust Magazine preferences
- Gift aid details

HOW IS THIS PERSONAL INFORMATION COLLECTED?

All the information collected is obtained directly from the member. This is usually at the point of initial registration, when the information will be collected via hardcopy-membership or online-contact forms. At the point that the member provides personal information for membership purposes, the U3A will indicate that it will store and use the data in order to communicate with you

HOW IS A MEMBER'S PERSONAL INFORMATION USED?

Personal information is used:

- To provide the U3A activities and services to the members.
- For administration, planning and management of the U3A.
- To communicate with individual members about their group activities.
- To monitor, develop and improve the provision of the U3A activities.

The U3A will send messages to members by email, other digital methods, telephone and post to advise them of U3A activities and thereby enable them to participate.

WHO WILL HAVE ACCESS TO THIS INFORMATION?

The U3A will allow access to members' personal information:

- **Internally:**
 - ~ to committee members, group leaders and other group members as required to facilitate individual members' participation in the U3A's activities;
- **Nationally,** with our 'umbrella' organisation, the Third Aid Trust:
 - ~ the U3A uses the Third Aid Trust's *Beacon* national membership management system (see below) to store members' details and to manage general membership information;
 - ~ The Third Aid Trust also offers direct mailing of its magazines, *Third Age Matters* and *Sources* (though members will be asked to opt in to these, too).

- **Externally**, but for very limited, legitimate purposes relevant to running the U3A:
 - ~ The U3A will not share members' data with external agencies for any purpose other than U3A organisation. For example, the Committee may decide to buy-in a service (such as the distribution of the Members Handbook).
 - ~ If such systems were to be used, the committee will insist on confidentiality and scrutinise the Terms and Conditions of each supplier to ensure their digital systems and other procedures are compliant with GDPR.
- **Legally**:
 - ~ If the U3A has a statutory duty to disclose it for other legal and regulatory reasons.

Where the U3A needs to share individual members information outside of the U3A, beyond the purposes listed, the U3A will seek the members' permission and inform them with whom and for what purpose the information will be shared.

HOW LONG IS THE PERSONAL INFORMATION KEPT?

Information about individuals will be stored on the active database for the duration of their membership (which individuals generally opt to refresh annually, each September). The data will also be held (on the active database) until the December of the year following the year in which the membership terminated.

However, there are instances where legal, taxation or insurance circumstances require information to be held for longer lest an issue arises that needs to be investigated or resolved. For example, HMRC and the Charity Commission require us to retain Gift-Aid and other records for seven years. The U3A will archive its de-activated records each December and inform the lapsed members as to how long the information will be held and when it will be permanently deleted. This archived information will only be reactivated if an appropriate authority legally requires it.

HOW CAN MEMBERS' INFORMATION BE UPDATED OR CORRECTED?

To ensure the information that the U3A holds is accurate and up to date, members need to inform the U3A as to any changes to their personal information. This can be done by contacting the membership secretary at any time:

Email: membership@malmesburyu3a.org.uk

Telephone: 01666 823568

On an annual basis members will have the opportunity to update their information on the membership renewal form. Should members wish to view the information that the U3A holds, they can make this request by contacting the membership secretary, as detailed above. There may be certain circumstances where the U3A is not able to comply with this request. This would include where the information may contain references to another individuals or for legal, investigative or security reasons. Otherwise the U3A will usually respond within 14 days of the request being made.

HOW IS THE PERSONAL INFORMATION STORED?

Membership information is held on an external membership management system (*the U3A Beacon Membership System*) and accessed by committee members and group leaders as appropriate.

The U3A Beacon Membership System has in place a range of security safeguards to protect personal information against loss or theft, as well as unauthorised access, disclosure, copying, use, or modification. Security measures include a powerful encryption system which creates a secure connection with members' browsers when they register and login into our online services.

(NOTE: The M&D U3A website is for the dissemination of information amongst the members; the U3A does not collect information via the website)

WHAT ABOUT PHOTOGRAPHS?

From time to time members will want to take photographs of U3A activities. All members taking photographs are expected to ensure that anyone pictured has consented to their inclusion. The U3A will occasionally use photographs

of its activities for the internal records such as the Newsletter and Information Board and for external publicity on the Website or advertising in other media.

DOCUMENTATION

Please see the Appendix for details about how the U3A uses the data.

DATA PROTECTION OFFICER

The GDPR mandates the appointment of a Data Protection Officer under certain circumstances. These apply if the organisation is:

- a public authority, ^[1]_[SEP]
- carrying out large scale systematic monitoring of individuals and/or ^[1]_[SEP]
- processing large amounts of sensitive data.

^[1]_[SEP]

None of these apply to the U3A, and the Executive Committee will take collective responsibility for data protection. However, the Committee will identify from amongst its number, appropriately skilled member(s) responsible for data security, to be known as the *Data Security Officer(s)*, deputed to ensure compliance with GDPR and from whom others may seek advice.

AVAILABILITY AND CHANGES TO THIS POLICY

This policy is available via the Malmesbury & District U3A website (<http://www.malmesburyu3a.org.uk>) or by application to the Business Secretary. This policy may change from time to time. If the U3A makes any material changes it will make members aware of this via the Newsletter, Bulletin or the monthly members' meetings.

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 us:

Email: secretary@malmesburyu3a.org.uk

Telephone: 01666 829002

Policy review date: 31st May 2019

ADDENDUM: *The Executive Committee Meeting of 21/05/2018 identified two Committee Members to act as Joint Data Security Officers for 2018/19:*

Dick Gray, Vice Chairman: *primarily concerned with the Beacon Membership Database and related practicalities of information management.*

John Fairhurst, Business Secretary: *primarily concerned with policy development, its implications and dissemination.*

Appendix

BEACON DOCUMENTATION

The GDPR requires that organisations document their use and location of data. All personal information is held within the Beacon Membership System (except for accounting documents and original Membership Application forms) and the following table shows who has access to the data that the U3A holds. It also defines how long the data should be retained after use and what considerations need to be given to maintaining data security.

Note: Group Leaders may maintain a sub-list of their group members' information to facilitate communication within the group. Such information will be afforded the same quality of protection as the Beacon Membership System data.

Job Holder	Data Access	Purpose of processing	Retention Policy	How secured
Chair	View contact details	Communication	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Secretary	View contact details	Communication	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Treasurer	Accounting information; View contact details	Accounting	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Treasurer	View contact details	Gift Aid	6 years plus current year to comply with HMRC ruling.	Password access to computer; Username/password access to Beacon System
Membership Secretary	Full Membership List	Membership List Maintenance	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Groups Coordinator	View contact details; group administration	Group Coordination	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Group Leader	View contact details; group info	Group Membership List maintenance; Communication	Duration of membership plus the period until the December of the year following termination.	Password access to computer; Username/password access to Beacon System
Beacon Administrator	Full access	Beacon administration	6 years plus current year.	Password access to computer; Username/password access to Beacon System

PAPER DOCUMENTATION

In certain circumstances, the use of paper records is unavoidable (e.g. in accounting and membership application). In these circumstances, such records will be kept in a locked container.