Malmesbury and District u3a

Privacy Policy

Malmesbury and District u3a (hereafter 'the u3a') treats all member privacy rights seriously. This privacy policy sets out what, how and why members' personal information is collected, used, stored and deleted and outlines your rights as a member to see, correct and delete the personal information held about you.

The u3a's practice is governed by the Data Protection Act 2018; UK General Data Protection Regulations 2021 (hereafter 'GDPR') and the Data Use & Access Act 2025 and is covered in more detail in the u3a's separate Data Protection Policy.

What personal information is ESSENTIAL for the u3a to have?

If you wish to become or remain a member of the u3a you will be asked to provide certain information. This 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 (landline or mobile).

What other information will the u3a request?

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 landline), if available.
- Local Newsletter and Bulletin preferences.
- National Third Age Trust Magazine preferences.
- Gift aid details.
- Emergency Contact Numbers (this is voluntary and not essential for membership but greatly simplifies the task of organising help and support for you in the case of a serious incident or accident).

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 my personal information stored & kept safe?

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)

How is my personal information used?

Your personal information is used:

- To enable us to provide the u3a activities and services to you.
- For administration, planning and management of the u3a.
- To communicate with you about meetings and group activities.
- To monitor, develop and improve the provision of the u3a activities.
- To uphold our duty of care to you through the use of your emergency contact information in event of a serious incident/accident

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.

In terms of GDPR, M&D u3a is the 'data controller' for the purpose of processing your data (i.e. we are responsible for keeping and using your information appropriately) and this information is processed on the grounds of 'consent' and 'contract' in relation to managing and providing u3a services and activities. Emergency contact information is requested but is voluntary and not necessary for membership. Emergency contact information will only be used in the event of a serious incident/accident to contact someone who is able to support you or liaise on your behalf with e.g. medical professionals.

Who will have access to my 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 or to make contact with your emergency contact in the event of a serious incident/accident;
- **Nationally,** with our 'umbrella' organisation, the Third Aid Trust:
    - The u3a uses the Third Aid Trust's *Beacon* national membership management system to store members' details and to manage general membership information;
    - The Third Aid Trust offers direct mailing of its magazine, Third Age Matters to members who have specifically opted to receive this.
- **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 information 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 my personal information kept?

Your information will be stored on the active database for the duration of your membership. If you cease to be a current member, then your record will be marked as no longer current and your information will be deleted from the system in December of the year following the year in which your membership ended.

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 financial records for seven years. Where there

are legal or regulatory requirements for us to keep your information for longer, your record will be marked as no longer current and will be deleted as soon as those requirements have been met.

Your rights to correct, see or delete your information

To ensure the information that the u3a holds is accurate and up to date, members need to inform the u3a about any changes to their personal information. This can be done by contacting the Membership Secretary at any time. Routinely, on an annual basis each January, you will have the opportunity to update your information on the membership renewal form.

You have a legal right to view the information that the u3a holds about you. Requests to see your data should be made to the Membership Secretary who will usually respond within one month of the request being made. There may be certain limited circumstances where the u3a is 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.

You also have the right to ask for all your personal information (electronic and paper-based), held by u3a to be deleted at any time (known under GDPR as the 'right to be forgotten'). A request for this should be made to the Membership Secretary who will confirm within one month that all personally identifiable data has been deleted. However, please note that the u3a is unable to offer membership to individuals who are not willing for their basic information to be held for the duration of their membership.

For all requests to see, correct or delete your personal information, please contact the Membership Secretary - membership@malmesburyu3a.org.uk

What about Photographs?

From time-to-time members may want to take photographs of u3a activities. All members taking photographs are expected to ensure that anyone pictured has consented to their inclusion. With consent, 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.

Data Protection Officers

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

- a public authority,
- carrying out large scale systematic monitoring of individuals and/or
- processing large amounts of sensitive data.

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. These will generally be the Chair and the Beacon Administrator.

Availability and changes to this policy

This policy is available via the Malmesbury & District u3a website or by application to the 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: secretary@malmesburyu3a.org.uk

If you believe that your data has not been used in line with data protection law, you have the right to complain to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF