



# Ludlow u3a Data Protection Policy

## Scope of the policy

This policy applies to the work of Ludlow u3a. The policy sets out the rules Ludlow u3a has to follow when gathering information for membership purposes. The policy provides details of 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 Ludlow u3a's committee members to ensure that we are compliant. This policy should be read in tandem with Ludlow u3a's Privacy Policy.

## Why this policy exists

This data protection policy ensures that Ludlow 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 and members from the risks of a data breach

## General guidelines for committee members and group coordinators

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Ludlow u3a members.
- Ludlow u3a will provide guidance to committee members and group coordinators to help them understand their responsibilities when handling data.
- Committee members and group coordinators 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 Ludlow u3a without prior consent and then only for specific and agreed reasons. Examples of specific and general reasons would include Gift Aid information provided to HMRC or information provided to the distribution company for the Trust publications.
- Member information should be refreshed annually to ensure accuracy, via the membership renewal process.
- Additional support will be available 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 further processed in a manner that is compatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall be considered to be compatible 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**

Ludlow u3a requests personal information from potential members for sending them communications about their involvement with Ludlow u3a. The form used to request personal information contains a privacy statement informing potential members about why the information is being requested and what the information will be used for. The lawful basis for obtaining members' information is due to the contractual relationship that u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes. u3a members will be informed about whom 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.

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

The Privacy Policy explains how members' information will be used and the committee of Ludlow u3a will seek to ensure that this information is not used inappropriately. Appropriate use of information provided by members will include:

- communicating with members about Ludlow u3a events and activities
- group coordinators communicating with group members about specific group activities
- consent being sought in order to add members details to the direct mailing information for the Third Age Trust magazine – Third Age Matters.
- sending members information about Third Age Trust events and activities
- communicating with members about their membership and renewal of their membership
- communicating with members about specific issues that may have arisen during the course of their membership

Ludlow u3a will ensure that group coordinators are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending members marketing and/or promotional materials from external service providers.

Ludlow u3a will ensure that members' information is managed in such a way as to not infringe an individual member's 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 Ludlow 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
- Subscription preferences

Where additional information may be required such as health related information this will be obtained with the consent of the member, who will be told why this information is required and what purpose it will be used for.

## **Photographs**

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they do not 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 Ludlow u3a to advise that they no longer wish their photograph to be displayed.

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

Ludlow u3a has a responsibility to ensure members' information is kept up to date. Members are asked to let the Membership Secretary know at [treasurer@u3ainludlow.org.uk](mailto:treasurer@u3ainludlow.org.uk) 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 Ludlow u3a of any changes in their personal information.

## **Accountability and governance**

Ludlow u3a committee are responsible for ensuring that Ludlow u3a remains compliant with data protection requirements. The committee will ensure that new members joining the committee receive guidance as to the requirements of GDPR and the implications for their role. Ludlow u3a will also ensure that group coordinators 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 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.

## **Secure Processing**

Ludlow u3a committee members have a responsibility to ensure that data is both securely held and processed. This is done using the secure Beacon database (provided by u3a for the use of all u3as through a subscription) to store all the data provided by members of Ludlow u3a.

Officers of Ludlow u3a have access to all members' data and study group coordinators have access to the data about members of their study group.

## **Subject Access Request**

Ludlow u3a members are entitled to request access to the information that is held by Ludlow u3a. The request needs to be made to the Membership Secretary at [treasurer@u3ainludlow.org.uk](mailto:treasurer@u3ainludlow.org.uk) . On receipt of the request, the request will be formally acknowledged and dealt with expeditiously (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. Ludlow u3a will provide a written response detailing all information held on the member.

## **Data Breach Notification**

Were a data breach to occur, action will be taken to minimise the harm. This will include ensuring that all Ludlow u3a 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 Ludlow u3a shall contact the Third Age Trust within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chair and the Third Age Trust about 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 members to inform them of the data breach and actions taken to resolve the breach.

If a Ludlow u3a member thinks that there has been a breach, 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 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 the Third Age Trust. The Ludlow u3a member should also be informed that they can report their concerns to the Third Age Trust if they do not feel satisfied with the response from Ludlow u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

## **Contact**

For queries about this policy, requests for the policy in alternative format, or any complaints about Ludlow u3a's privacy practices, contact:

Email: [info@u3ainludlow.org.uk](mailto:info@u3ainludlow.org.uk) Telephone: 01584 878794

**Policy reviewed: September 2022**

**Next review date: September 2025**