

Upton & Lytchett u3a Privacy Policy

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1. INTRODUCTION

Upton and Lytchett u3a treats your privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you. In relation to our website, the policy applies to both the members of the u3a and visitors to the site.

In this Privacy Policy, where we use the words **personal data** we mean information that is about you and which identifies you, the word **Trust** means The Third Age Trust (charity number 288007) and the acronym **TATTTL** means Third Age Trust Trading Limited (company number 11899419).

This Policy describes:-

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

This is to make sure you have a full picture of how we collect and use your personal data.

If you have any concerns about this policy or the topics it covers, please contact the Membership Secretary.

2. WHAT PERSONAL DATA DO WE COLLECT?

We collect and use personal data about you for the purpose of communicating with you as representative of your U3A. The information that you provide to us or we collect from you may include the following:

Type of Personal Data	Examples
General	
Contact information	When you express an interest in becoming a member of Upton and Lytchett u3a you will be asked to provide certain information. This includes: <ul style="list-style-type: none"> • your name • home address • email address • telephone number
Marketing	
Subscription Preferences	Details of any marketing preferences that you express including any opt outs you provide.
Other	
Online activity information (to the extent that it constitutes personal data)	Technical information, through your internet browser or electronic device: Certain information is collected by most websites or automatically through your electronic device, such as your IP address (i.e. your computer's address on

	<p>the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, electronic device manufacturer and model, language, time of the visit and pages visited.</p> <p>Technical information, using cookies and online tracking: Cookies are pieces of information stored directly on the device you are using to access our website. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the website and the pages visited.</p>
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This information may be provided in the course of communications between you and us (including by phone, email or otherwise) when you provide personal data via our website or using other systems which we provide to you, or via our social media pages, other social media content, tools and applications.

In the course of us communicating with you, you may provide us with personal data relating to third parties.

We will use this personal data in accordance with this Privacy Policy.

If you are providing personal data to us relating to a third party, you confirm that you have the consent of the third party to share such personal data with us and that you have made the information in this Privacy Policy available to the third party.

3. WHO IS RESPONSIBLE FOR IT?

Upton and Lytchett u3 is the data controller for the purposes of data protection law, in respect of your personal data collected and used by us.

4. HOW DO WE USE YOUR PERSONAL DATA?

We use your personal data for a variety of different purposes when we provide services to you. These are set out below.

Under data protection law, we can only use your personal data if we have a legal basis to do so. One or more of the reasons below can constitute a legal basis:-

- we have your consent;
- it is necessary 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.

The table below sets out the purposes for which we use your personal data and the legal basis for doing so.

Purpose	Legal Basis
To set up and manage your membership	Contract Legitimate interests
To manage membership information on the Beacon system (if appropriate)	Contract Legitimate interests

Purpose	Legal Basis
To share with the Trust and TATTL to manage, develop and make improvements to the Beacon system	Legitimate interests
To administer, plan and manage our U3A	Legitimate interests
To monitor, develop and improve the provision of our U3A activity	Legitimate interests
To communicate with you about our U3A products, services, activities and events	Contract Legitimate interests
To communicate with you about Trust products, services, activities and events	Contract Legitimate interests
To deliver Trust publications including Third Age Matters	Contract Legitimate interests
To comply with any legal or regulatory obligations (including in connection with a court order)	Legal obligation
To enforce or apply the agreements concerning you (including agreements between you and us).	Contract Legitimate interests
To manage any issues, complaints, feedback and enquiries.	Consent Contract Legitimate interests

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

5. TO WHOM MAY WE DISCLOSE IT?

We may share your personal data with the Third Age Trust and Third Age Trust Trading Limited and our service providers and business partners.

Type of third party	Examples
General	
Our service providers and business partners	Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
Our professional advisers	Including accountants, lawyers and other professional advisers that assist us in

Type of third party	Examples
	carrying out our business activities.
Government authorities and third parties involved in court action	External agencies and organisations (including the police and other law enforcement agencies) for the purpose of complying with applicable legal and regulatory obligations.
Law Enforcement and Regulation	
Police and law enforcement agencies	We may share personal data with the police and other law enforcement agencies in connection with the prevention and detection of crime
Regulatory bodies	We may share personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties

Name of third party	Purpose
Third Age Trust	For Third Age Trust to provide membership support, advice and guidance
Third Age Trust Trading Limited	For Third Age Trust Trading Limited to provide various services
Other relevant U3As	For the purposes of reciprocal membership of another u3a

We may also disclose your personal data to other third parties, for example:

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; and

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).

If we transfer personal data outside the UK or the European Economic Area (EEA), we will implement appropriate and suitable safeguards to ensure that such personal data will be protected as required by applicable data protection law.

6. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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.

Please note that the above retention period may be extended where we need to preserve and use personal data for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal data for as long as is necessary to deal with the legal proceedings.

7. 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. Details of who to contact to exercise these rights can be found in paragraph 14.

	Summary of your rights
Right of access to your personal data	You have the right to receive a copy of your 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, member's need to inform the U3A as to any changes to their personal information. You can do this by contacting the Membership Secretary.</p> <p>On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process.</p> <p>If you wish to view the information that the u3a holds on you, you can make this request by contacting the Membership Secretary. We will usually respond within one month of the request being made.</p> <p>However, there may be circumstances in which we cannot comply with this request, for example, if the information contains references to other individuals or for legal, investigative or security reasons.</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;

	Summary of your rights
	<ul style="list-style-type: none"> ● 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	<p>You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:</p> <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.

	Summary of your rights
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	<p>You have the right to complain to the relevant data protection authority, which is in the case of us, 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:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p>