

Cheltenham u3a Privacy and Data Access Policy

1. Introduction

Cheltenham u3a (registered charity number 299146) treats your privacy seriously. This Privacy Policy sets out the basis on which Cheltenham u3a (**we** or **us**) collect and use personal data about you.

The justification for why the personal data is needed and access by specific individuals is allowed is given in **Appendix I**.

2. Type of personal information we collect

We collect the following information:

- a. about you (name, address, telephone number, email, emergency contact info).
- b. about your membership (membership number, membership type, status and history).
- c. about your preferences (can Gift Aid be claimed, have you opted out of the Newsletter or Third Age Matters).
- d. about which groups you have joined.

3. How we get personal information

Most information is provided to the membership secretary when you join or renew your membership. Group leaders can also provide information on which groups you have joined.

4. How we store your personal information

The information that we hold about you is stored on the Beacon database. This is an online management system designed to support the operation and administration of individual u3as. It is a secure database and all access to it is logged. Third Age Trust Trading Limited (company number 11899419) provides the Beacon system as a service to individual u3as. Whilst the system supports multiple u3as, each u3a can only administer and view its own data.

5. Why we have personal information

Under data protection law, we can only use your personal data if we have a legal basis to do so. The legal bases are:

- a. we have your **consent**.
Your consent is requested when you join. You can withdraw your consent to the use of your data at any time by contacting the Membership Secretary, although this will usually mean that you will effectively be resigning your membership.
- b. it is necessary to enter into or perform a **contract** we have with you
- c. it is necessary to comply with a **legal obligation**
- d. it is in our **legitimate interest** to process your personal data.

6. How your data is used

Your personal data is used for the following purposes

- a. to manage membership information on the Beacon system
- b. to communicate with you about u3a products, services, activities and events
- c. to claim Gift Aid (if you have indicated that this is permitted)
- d. to deliver information through the post, including our Cheltenham Newsletter (unless you have opted out)
- e. to deliver Third Age Trust publications through the post, including Third Age Matters (unless you have opted out)
- f. to allow building, maintaining, managing, developing and improving the Beacon database and investigating system problems.

7. Who has access to your personal data

The following persons have access to your personal data:

- a. The Beacon Administrator, Webmaster and Committee members through their logged access, to enable them to perform their roles.

- b. The leader of any group that you join (provided they have chosen to use Beacon), through their logged access. This access is only to the subset of your personal data relevant to group membership.
- c. HMRC is sent information as part of the process to claim Gift Aid.
- d. The company that prints and distributes our Newsletters is sent a list of names and addresses, currently In2Print Cheltenham*.
- e. Third Age Trust Trading Limited is sent a list of names and addresses to allow the distribution of Third Age Matters*.
- f. Those authorised by Third Age Trust Trading Limited occasionally need access so that they can support the Beacon system*.

Occasionally access will be given to non-committee members under strictly limited conditions who are assisting a committee member with a task. These conditions are identified in **Appendix I** below.

*All data access for persons who are not members of Cheltenham u3a is subject to confidentiality agreements.

8. How long we will keep your personal data

Your data will be marked as:

- a. resigned if you tell us that you no longer wish to be a member, or
- b. lapsed if you do not renew your membership by the end of February of any year i.e. after a 2-month period following the end of your current membership.

Details for inactive members are deleted from the database when they are no longer required for legal and regulatory reasons (currently 7 years).

9. Your data protection rights

Under the data protection law you have the following rights:

- a. **Your right of access** – you have the right to ask us for copies of your personal information.
- b. **Your right of rectification** – you have the right to ask us to rectify or complete personal information you think is inaccurate.
- c. **Your right to erasure** – you have the right to ask us to erase your personal information in certain circumstances.
- d. **Your right to restriction of processing** – you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- e. **Your right to object to processing** – you have the right to ask us to object to the processing of your personal information in certain circumstances
- f. **Your right to data portability** - you have the right to ask that we transfer the personal information you gave us to another organisation, or you, in certain circumstances.

You can exercise your rights by contacting the Membership Secretary, who will reply within a calendar month.

Last reviewed and updated: December 2023

Appendix I - Justification for giving access to Member Data on the Beacon System.

The following have access to Member data on the Beacon system:

1. All committee members.
2. The Gift Aid Administrator.
3. The Webmaster.
4. Group Leaders who request to use Beacon.
5. The BEACON administrator(s).
6. Occasionally non-committee members, assisting a committee member with a specific task under the rules below.

This access will be restricted in line with the following rules:

- 6.1 The extent of access and privileges for each member is limited to that required to perform the specific task.
- 6.2 When a task is completed, the access is removed.
- 6.3 The need for continuing access is kept under review.
- 6.4 The extent of access allowed must be agreed with the Cheltenham u3a Beacon Administrator.
- 6.5 The downloading of data must be limited and if it is necessary, kept secure and must be deleted when no longer required.

Members' personal data can be viewed in two places:

- 1) In the member list. This shows the postal address, a telephone number (landline number if there is one, otherwise a mobile number), the member class and the status of the member.
- 2) In a member record. This shows the postal address, an email address, a landline number, a mobile phone number, member class, member status, Gift Aid status, an emergency contact, GDPR consent reference, membership payment record, groups to which they belong (if the Group Leader provides the information to directly or via the administrator to Beacon), whether they have opted out of a posted newsletter or Third Age Matters. There is also a notes field which is used for administration purposes.

There is no way of selectively hiding individual fields in the member record. If a person is given access for one reason, they will be able to see all the information about a member.

Justification

Committee Members

Committee members do a variety of roles in managing Cheltenham u3a. The three most significant users of Beacon are the Membership Secretary, the Treasurer and the Groups Co-ordinator. The Membership Secretary needs full access as he or she needs to maintain the records. The Treasurer needs full access to contact details in order to follow up on payment problems or to work with the Gift Aid Administrator (see below). The Groups Co-ordinator needs access as he or she

needs to add members to groups by name (something Group Leaders cannot do). Also, he or she needs to be able to check the membership status of a member who wants to join a group. In addition, the Groups Co-ordinator needs to be able to contact Group Leaders by post, email or telephone and so needs full access.

For all of the above, there needs to be another person on the committee who can take on the role in the event that role holder is unable to. Who that is can vary, depending on the role and the level of Beacon skills within the committee.

Other committee members will perform a variety of roles including one off tasks or projects. Many of these would require some level of access to member contact information. A particular example of this would be emergency contact details. It would be very inefficient if a committee member had to ask the Membership Secretary to provide such contact details for members. It would also be less secure if contact details were passed around by email.

Gift Aid Administrator

The Gift Aid Administrator generates the gift aid claim from Beacon. The administrator needs to be able to check the gift aid status of a member and the date from which the member opted for gift aid. The administrator also needs to be able to check addresses as the current address may be different to when the member signed a gift aid declaration. Finally, the administrator needs to be able to check historical payments to see if gift aid was claimed.

To see the above, the Gift Aid Administrator needs access to members' individual records.

Note: The current Gift Aid Administrator is an ex-committee member and hence was previously a trustee of Cheltenham u3a.

Webmaster

The Webmaster receives queries from members who are unable to view the members only area of the website or to log in to the Beacon portal. To resolve these, he needs to access individual member records to establish if they are current members and to check that the data they are entering matches what we hold for them. For example, if a member has registered online and entered their name as "bill smith" that is what their membership card will show and if when trying to view the members area they enter "Smith" access will be refused.

Note: Like the Gift Aid Administrator, the current Webmaster is an ex-committee member.

Group Leaders

Group Leaders have limited access to member data. When they add members to their group (something they can only do if the members give the group leader their membership number) the Group Leader can see contact details for the member including postal address, email address (indirectly), landline number and mobile phone number. They can also see the emergency contact for the member if there is one. All the above are necessary for managing their group.

Group Leaders do not have access to the individual member record.