

Bulkington, Nuneaton and Bedworth u3a Data Protection and Privacy Policy

1. Document purpose

The BNB U3A treats data privacy rights and protection of data seriously. The Policy sets out the requirements that BNB u3a has to gather information for membership purposes. The Policy also details how personal information will be gathered, stored and managed in line with data protection principles and the UK General Data Protection Regulation. The policy is reviewed on an ongoing basis by BNB u3a committee members to ensure that we are compliant. This issue combines the Privacy and Data Protection policies previously issued as separate documents. The Appendix documents data retention policies.

2. General guidelines for Data Protection and Privacy

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the BNB u3a members.
- BNBu3a will provide induction training to committee members and group leaders to help them understand their responsibilities when handling data.
- Committee Members and group leaders should keep all data secure, by taking sensible precautions and following the guidelines below.
- Data stored online or in local devices should be protected by strong passwords and they should never be shared.
- Data should not be shared outside of the u3a unless with prior consent and/or for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided to the national distribution company for the Third Age Trust publication, 'u3a Matters'.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be sought from the Third Age Trust where uncertainties or incidents regarding data protection arise.

3. Data protection principles

The General Data Protection Regulation(GDPR) 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 not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

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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 the 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 accordance 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.

3.1 Lawful, fair and transparent data processing

- BNB u3a requests personal information from potential members and members for membership applications and for sending communications about their involvement with the u3a.
- The forms, paper or online, used to request personal information will contain a privacy statement informing potential members and members as to why the information is being requested and for what the information will be used. Online forms will contain an explicit checkbox requiring users to tick to accept this policy.
- The lawful basis for obtaining member information is due to the contractual relationship that the u3a, as a whole, has with individual members.
- In addition members will be asked to provide consent for specific processing purposes.
- U3a members will be informed as to who 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.

3.2 Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of BNB u3a will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about BNB u3a events and activities
- Group Leaders communicating with group members about specific group activities
- Consent will be sought in order to add members details to the direct mailing information for the Third Age Trust magazines – Third Age Matters
- Group Leaders holding emergency contact information on their group members
- Sending members information about Third Age Trust events and activities
- Communicating with members about their membership and/or renewal of their membership

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- Communicating with members about specific issues that may have arisen during their membership
- Collection of financial data for inclusion in Annual Accounts for presentation to the membership and to u3a National Office and the Charity Commission.

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

BNB 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

3.3 Adequate, relevant and limited data processing

Members of BNB u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number
- Tax/Gift Aid entitlement
- Communication Preferences (e.g. post, email, phone)
- Interest Group preferences and membership

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

Where BNB u3a organises a trip or activity that requires next of kin/emergency contact information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

We may disclose information about members, including personal information:

- Internally – to committee members and group leaders – as required to facilitate participation in the BNB u3a activities
- Externally – with consent for products or services such as direct mailing for the Trust magazine – Third Age Matters, and HMRC for Gift Aid claims

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- We have a statutory duty to disclose it to other legal and regulatory bodies if required

Where we need to share member information outside of the u3a we will seek consent and inform the member as to whom the information will be shared with and for what purpose

3.4 Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't 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 BNB to advise that they no longer wish their photograph to be displayed.

3.5 Accuracy of data and keeping data up to date

BNB u3a has a responsibility to ensure members' information is kept up to date. Members will be informed to let the Membership Secretary know 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 BNB u3a as to any changes in their personal information.

In most instances, membership information will not be stored for longer than 12 months, beyond the membership moving to inactive status. The exceptions to this are instances where there may be legal or insurance circumstances that require information to be held for longer whilst the issues are investigated or resolved. Where this is the case, the member will be informed as to how long the information will be held for and when it is deleted. Financial information relating to subscriptions for those consenting to Gift Aid claims are required to be kept for 6 years after the end of the financial year following closure of membership.

3.6 Accountability and governance

The BNB u3a Committee are responsible for ensuring that the u3a remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The BNB u3a Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. BNB u3a will also ensure that Group Leaders 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 National Office 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. When Committee members and Group Leaders relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

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3.7 Secure Processing

BNB u3a Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords when accessing member information
- Committee members not sharing passwords
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain personal information
- Using password protection or secure cloud systems when sharing data between committee members and/or group leaders

Membership information is held in a Membership Database hosted on the BNBu3a Website and accessed by the Membership Secretary only. The Membership Secretary provides information to committee members and Group Leaders – as appropriate. Information about contact details for emergency purposes is held in paper format by the Groups Leaders of any interest groups you attend, if considered necessary by the Group Leader.

Members are entitled to request access to their information held by BNB u3a. The request needs to be received in the form of a written request to the Membership Secretary. On receipt of the request, the request will be formally acknowledged and dealt with expediently (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). BNB u3a will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

3.8 Data Breach Notification

Where data breaches do occur, action shall be taken to minimise the harm. This will include ensuring all BNB 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 the BNB u3a shall contact u3a National Office within 24 hours of being made aware of the breach occurring to notify of the breach. A discussion will take place between the Chair and National Office as to 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 BNB u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a BNB u3a member feels that there has been a data 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 National Office. The member should also be informed that they can report their concerns to National Office if they don't

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feel satisfied with the response from the BNB u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

4 Availability and changes to this policy

This policy is available on the BNB website and the content may change from time to time. If we make any material changes we will make members aware of this via the BNB u3a Newsletter and at monthly members meetings.

5 Contact

If you have any queries about this policy, need it in a different format, or have any complaints about our Data Protection/Privacy practices, please contact us at chair.bnb@u3anuneaton.org.uk or on 07851 627977. The BNBu3a Chair is designated as the Data Protection Officer for this organisation, to whom all Data Protection issues should be addressed.

6 Issue History

Version	Description of changes	Date of change	Review date
1.0	Initial Issue – based on previous separate documents for Privacy and Data Protection Policies	02/03/2026	

APPENDIX - Membership Data Retention Policy

1 Purpose of this Appendix

During their membership, a lot of data is recorded on each individual, to communicate with them and to record subscription information. This document describes the policy for the retention of such records to comply with both the BNBu3a Data Protection Policy and UK legislation. The document also specifies who is responsible to the retention of this data. As responsibilities are split between the membership Secretary and the Treasurer. Some of the data is held as paper documents and some is held electronically, and this will also be specified. The document also specifies retention policies for Committee documents and AGM notes.

2 Scope

The following data is included in the scope of this document:

- a. Communication data – Name, Address, Email, Phone and preferences for which medium should be used for communications
- b. Subscription Data – date of initial registration, Renewal dates and fees paid, receipts for payment from external payment processor
- c. Gift Aid Declarations – if Members are Tax Payers, they will record that and indicate whether they are willing for BNBu3a to reclaim the tax paid under the Gift Aid scheme
- d. Relationship data – where couples are married or have another relationship, this is recorded as it will be linked to the fees paid
- e. Interest Group data – where members participate in Interest Groups, this will be recorded
- f. Magazine Preference – indicates whether the member would like the regular 'Third Age Matters' magazine
- g. Committee Meeting and AGM documents

The main Financial Data concerning financial transactions required for the Annual Accounts is not in the scope of this document and is covered in the BNBu3a Financial Policy document.

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3 Retention Policies

NOTE: where 'Electronic' Format is specified this is held in the Membership Management database hosted with the Website data.

Data Type	Data Format/Medium	Retention Rule	Responsibility
Members' Communication data	Electronic	Held while the membership is active + 1 year for non-tax-payers and +6 years for those with active Gift Aid declarations	Membership Secretary
Subscription Data	Electronic	Basic data held as for Communication data (i.e. dates, fee amounts). Payment Receipts held separately by Treasurer as part of Accounts	Membership Secretary/ Treasurer
Gift Aid Declarations and subscription data	Paper format for those enrolling/renewing offline, Electronic format for those using website forms	All Gift Aid data to be held for 6 years after the end of the financial year in which last payment is made. <i>Paper forms with GA Declarations where available will be held as well as electronic records</i>	Membership Secretary – main GA data, Treasurer – GA Claim Data and HMRC Receipts + Paypal receipts for member fees receipts
Relationship data	Electronic	Held while the membership is active + 1 year for non-tax-payers and +6 years for those with active Gift Aid declarations	Membership Secretary
Interest Group Data	Electronic	Held while the Group membership is active, removed when the member ceases to be a group member	Membership Secretary
Magazine Preference	Electronic	Held while membership is active or until the member changes their preference	Membership Secretary
Committee Meeting Records and AGM Minutes	Electronic	Held permanently for the life of the u3a	Secretary + AGM records online in Website