

Tetbury & District u3a

Privacy Policy

1. Introduction

Tetbury & District u3a (**we** or **us**) treats your privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you.

In this Policy, where we use the words **personal data** we use these words to describe information that is about you and which identifies you.

In this Policy:

- the word Trust means The Third Age Trust (charity number 288007)
- the word TATTL means Third Age Trust Trading Limited (company number 11899419) and
- the Beacon system means the membership data system operated by TATTL and used by us to manage membership records and communication with you.

This Policy describes:

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

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

2. Who is responsible for the personal data that we collect?

We are the data controller for the purposes of data protection law, in respect of your personal data collected and used by us.

3. What personal data do we hold about you?

We collect and use personal data about you for the purpose of communicating with you about our u3a activities. The personal data we hold includes:

- Your name and title
- Your address
- Your email address
- Your telephone number/s
- Details of who you would like us to contact in an emergency
- Whether you wish to Gift Aid your membership fee



This information may be collected:

- (a) from your completion of a membership application form
- (b) subsequently in the course of communications between you and us (including by phone, email or otherwise) to update your personal information;

4. How do we use the personal data we collect about you?

We use your personal data for a variety of different purposes during the course of us providing services to you. The purposes for which we use your personal data are set out below. Under data protection law, we can only use your personal data if we have a legal basis to do so. Examples of where we have a legal basis to process your personal data, includes when:

- we have your **consent**;
- it is necessary to comply with a **legal obligation**;
- it is in our **legitimate interests** to process your personal data.

We have set out our reasons for using your personal data in the table below.

Purpose	Legal Basis
To set up and manage your membership	Legitimate interests
To manage membership information on the Beacon system	Legitimate interests
To share with the Third Age 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 activities and events	Legitimate interests
To communicate with you about Third Age Trust products, services, activities and events	Legitimate interests
To deliver Third Age Trust publications including Third Age Matters magazine	Legitimate interests
To comply with any legal or regulatory obligations (including in connection with a court order)	Legal obligation



Purpose	Legal Basis
To manage any issues, complaints, feedback and enquiries.	Consent Legitimate interests

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

We may share your personal data with:

- the Third Age Trust
- Third Age Trust Trading Limited
- our service providers and business partners for the performance of any contract we enter into with you
- our professional advisors including accountants, lawyers and others that assist us in carrying out our business activities
- Government authorities and third parties (including the police and other law enforcement agencies) involved in court action for the purpose of complying with applicable legal and regulatory obligations, or for the prevention and detection of crime
- Regulatory bodies if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or instructions (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)

5. Where will we transfer your personal data?

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. Generally we will keep your information for no longer than two years after you have ceased to be a member or 7 years if you have used Gift Aid.

Please note that the above retention periods 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. These rights are:

Right of access: 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. Should you wish to view the information that the u3a holds on you, you can make this request by contacting the membership secretary. There may be certain circumstances where we are 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. We will usually respond within one week of the request being made.

Right to rectify: You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete. To ensure the information we hold is accurate and up to date, members need to inform us of any changes to their personal information. You can do this by contacting the Membership Secretary via our website.

Right to erasure: You have the right to ask that your personal data be deleted in certain circumstances. For example:

- where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used;
- 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 use: You have the right to suspend our use of your personal data in certain circumstances. For example:

- 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: 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. The right only applies:

- to personal data you provided to us;
- where we rely on the following legal bases:
- 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 use: You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example:

- 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.

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: 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:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

8. Queries

If you have any questions about this policy please contact the Chair (contact details are available on our website).

Approved by Trustees: 21st May 2025

Next scheduled review: May 2028 (unless relevant legislation changes before this date)