

DATA PROTECTION AND PRIVACY

This document should be read in conjunction with the Third Age Trust Data Protection and Privacy policies, which can be found on the Policies section of the Third Age Trust (TAT) website.

We are exempt from registering with the Information Commissioner's Office, as we are a not-for-profit organisation. However it does not exempt us from the provisions of the General Data Protection Regulations (GDPR), and we can be subject to penalties if we don't comply. The personal data in question is our Membership, photographs, and Groups' data. Members will be informed how we hold and use the personal data they provide when they join and renew and that we will be taking photographs of u3a events for use on our website, newsletter, and notice boards.

Any member should make it known to a Committee Member if they have any issues with this approach. We will always make it clear when photographs are being taken so Members can excuse themselves if they do not wish to be included in the photograph.

The rest of this document outlines how we ensure we will comply with the requirements of GDPR in order to protect Members' data.

- 1) The Committee will appoint a Data Owner who will be a Committee Member responsible for the compliance with this policy.
- 2) The Data Owner will review the Legitimate Interest Assessment every two years, which shows that we are able to use legitimate interest when processing personal data.
- 3) The Membership form will contain a clear privacy statement as follows:
Your personal details will be held on a secure database and will be used solely for the purposes of administration and the distribution of u3a and Third Age Trust communications. Photographs of u3a activities will be taken for use on our website, newsletter and notice boards.
- 4) Membership and Group Membership information will be held on encrypted spreadsheets held on a reputable and secure cloud storage drive protected by a randomly generated password. These spreadsheets will require a password to open the file in order to view the data and a different password to add or change Membership data.
- 5) Passwords will be held by the Data Owner and be changed at least annually to coincide with any changes on the Committee after the AGM.
- 6) The Cloud storage will be automatically backed up to ensure we can restore files in the unlikely event of accidental or deliberate deletion or corruption.
- 7) The Membership Secretary will hold an encrypted master copy of the Membership spreadsheet on the u3a computer.
- 8) Access will be limited as follows (*see overleaf*):

Access to Cloud drive	All Committee Members
View Membership data	All Committee Members who legitimately require it
Receive Members' email addresses	All event organisers and Group Secretary and Group Coordinators
Change or add Membership data	Membership Secretary and Data Owner
Copy Membership data	Chairman, Business Secretary, Events Secretary, Membership Secretary and Publicity Officer
View Group data	All Committee Members who legitimately require it. An unencrypted copy of the Group Membership can be provided to the Group Coordinator on request.
Change/copy or add Group data	Group Coordinator and Data Owner
Back-up access and control	Data Owner

- 9) In order to be granted access to the cloud storage Committee Members must agree:
- a) Once logged in to the Cloud storage to destroy any written version of the password. The Data Owner will hold securely all passwords.
 - b) Not to use the data for any other purpose than that stated in the Privacy Statement.
 - c) Not to save any files outside the Cloud storage.
 - d) To ensure their PC or mobile device requires a password when it is switched on or wakes from sleep.
 - e) If the Cloud storage is accessed through a mobile device it is further protected by a pincode set in the Cloud application.
 - f) To log out of the Cloud storage when they finish their term on the Committee and not access it in future.
 - g) To never share a password with anyone.
 - h) To never save the Membership spreadsheet when asked to when closing the file unless you are authorised to change Membership information (*see above*).
 - i) Membership information held on the spreadsheet will be retained for a maximum of two years, after which it will be deleted and their Membership forms shredded. If Members signed a Gift Aid authorisation form this will be held in paper format for six years to comply with HMRC rules – after which they will be shredded.

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