

# **Privacy policy**

# Introduction

Following the introduction of the UK's Data Protection Act 2018 (implementing the General Data Protection Regulation (GDPR) mutually agreed by the EU) which controls how your personal information is used, U3AC implemented this privacy policy, which covers:

- The legal basis we rely on to use your information
- Why we need your information and how we use it

## Your personal data

At U3AC the Trustees (Council), who are defined as the Data Controllers under the Data Protection Act, take your privacy seriously. We will use your personal information only to administer your membership account for the delivery of the activities offered by the organisation. We do this on the basis of Legitimate Interests, which is that we use the personal data you provide to us in ways you would reasonably expect and which have a minimal privacy impact.

#### What we need and why we need it

In order to manage the activities offered by U3AC we ask you to provide limited personal data. We will not collect any personal data from you that we do not need in order to provide and oversee this service to you.

#### What we do with it

We have Data Protection procedures in place to oversee the effective and secure processing of your personal data.

Only members of our staff, based in the UK, process the personal data we hold. For the purposes of IT hosting and maintenance our database is located on servers within the European Union. No third parties have access to this database unless there is a legal requirement.

U3AC uses the secure e-mailing service Mailchimp to send out the weekly Bulletin. This service is hosted in the United States; members' email addresses are provided to this service unless you tell us not to.

We will publish tutor contact information only in agreement with the tutor's wishes. To assist in the delivery of classes we will provide your contact information to your class tutor unless you tell us not to. Tutors will only share this data with other members of your class with your permission. Tutors will not share your data in any other circumstances. Tutors are instructed to delete and destroy the contact details of class members at the end of each academic year.

## How long we keep it

We keep your personal data while you are a member of U3AC. If you leave U3AC we will retain data that would enable you to re-join without incurring a joining fee. We will remove your data immediately if you request us to do so.

## What are your rights?

You can view your personal data by logging on to your account via the U3AC website. You can ask the U3AC Office to provide you with the details of your personal data on presentation of your membership card. If at any point you believe the information we process on you is incorrect you can request to have it corrected or deleted.

The Data Protection Act provides the following 8 rights for individuals:

- 1. The right to be informed; this is provided via this Privacy Notice
- 2. The right of access; provided in the section above 'What are your rights?'
- 3. The right to rectification; provided in the section above 'What are your rights?'
- 4. The right to erasure; provided in the section above 'What are your rights?'
- 5. The right to restrict processing; *If processing is restricted, your access to U3AC activities would be limited*
- 6. The right to data portability; this allows individuals to obtain and reuse their personal data for their own purposes across different services. This is not applicable to the data held by U3AC
- 7. The right to object; individuals can object to processing based on legitimate interests, direct marketing (not undertaken by U3AC); and processing for purposes of scientific/historical research and statistics (only anonymised data is used by U3AC for any statistical analysis)
- 8. Rights in relation to automated decision making and profiling; we only undertake automated processing for course allocation, see section above 'Why we need it'

# Complaints

If you wish to raise a complaint on how we have handled your personal data, you can contact the U3AC Office in the first instance on office@u3ac.org.uk who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO). If you require further information, please contact the U3AC Office on <u>office@u3ac.org.uk</u>.

# Approved by Council: 31 October 2023

Next review date: October 2025