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3 YEARLY OR CHANGE OF LEGISLATION

Version 2 – Revised July 2018

April 2021 – Section 6 – How long do we keep your personal information.

Recommended Third Age Trust model privacy policy adopted – November 2024

1. Introduction

Saltburn District u3a ('SDu3a') treats your privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you.

In relation to SDu3a website, the policy applies to both the members of SDu3a and visitors to the site.

Personal Data

In this Privacy 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 Privacy Policy

- the word Trust means Third Age Trust (charity number 288007);
- the word TATTL means Third Age Trust Trading Limited (company number 11899419);
- the Beacon system means the membership data system operated by TATTL.

This Policy describes:

- who is responsible for the personal data 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 make sure 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?

SDu3a is 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?

Collection and use

We collect and use personal data about you for the purpose of communicating with you as a member of SDu3a. The personal data we hold includes:

- Information that you provide to us/we collect from you;

The following information that you provide to us/we collect from you may include the following:

- your name;
- home address;
- email address;
- telephone number;
- emergency contact information;
- details of any marketing preferences that you express including any opt outs you provide;
- technical information through your internet browser or electronic device. Certain information is collected by most websites or automatically through your electronic device, such as your IP address (your computer's address on the internet).
- Technical information using and online tracking. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the website and the pages visited.

This information may be provided:

- in the course of communications between you and us (including by phone, email or otherwise);
- when you provide personal data via our website or using other systems which we provide to you;
- via our social media pages, other social media content, tools and applications;

4. Information about third parties

Third parties

- In the course of us communicating with you, you may provide us with personal data relating to third parties.
- We will use this personal data in accordance with this Privacy Policy. If you are providing personal data to us relating to a third party, you confirm that you have the consent of the third party to share such personal data with us and that you have made the information in this Privacy Policy available to the third party.

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

Purposes

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

- where we have your consent;
- it is necessary to enter into or perform a **contract** we have with you (or to take steps at your request prior to entering into that contract);
- 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 under the heading Legal Basis. Where we rely on our legitimate interests, we have set out those interests in the table below:

Purpose	Legal Basis
To set up and manage your membership	Contract Legitimate Interests
To manage membership information on the Beacon system	Contract Legitimate Interests
To share with the 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 Interest
To communicate with you about our u3a products, services, activities and events	Contract Legitimate Interest
To communicate with you about Trust products, services, activities and events	Contract Legitimate Interest
To deliver Trust publications including u3a Matters	Legal Obligation
To comply with any legal or regulatory obligations (including in connection with a court order)	Legal Obligation
To enforce or apply the agreements concerning you (including agreements between you and us)	Contract Legitimate interest
To manage any issues, complaints, feedback and enquires	Consent Contract Legitimate Interest

6. Automated processing

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

7. Who may we disclose your Personal data to?

We may share your personal data with:

- the Third Age Trust;
- Third Age Trust Trading Limited;
- our service providers and business partners.

For more information, please refer to Schedule 1 and Schedule 2

We may also disclose your personal data to other third parties for example:

- if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our agreements concerning you (including agreements between you and us).

8. Where will we transfer your personal data?

Within the United Kingdom.

9. How long will we keep your personal data?

No personal bank details are retained, electronically or manually, by the Treasurer following payments issued to members.

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.

Please note that the above retention period 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.

10. 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. Please see the table below for a summary of your rights. Details of who to contact to exercise these rights can be found in paragraph 14.

10.1 Summary of your rights

Right of access to your personal data

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.

Right to rectify your personal data

- 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 SDu3a as to any changes to their personal information. You can do this by contacting the **membership secretary** at the monthly update meetings or by using the contact form on our website for the **membership secretary**.
- On an annual basis you will have the opportunity to review and update your information, as required, via the membership renewal process. Should you wish to view the information that SDu3a holds for 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. Otherwise, we will usually respond within one month of the request being made.

Right to delete your personal data

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 the use of your personal data

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 deletion 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 the use of your personal data

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;
- 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 to the relevant data protection authority

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

11. Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit.

12. Our website

Our website address is: <https://saltburndistrict.u3asite.uk>.

When people leave comments on the site, we collect the data shown in the comments form, and their IP address and browser user agent string to help spam detection.

Media

- If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Other members will be able to download and extract any location data from images on the website.
- Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.
- These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Cookies

- If you leave a comment on our site, you may opt in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.
- If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.
- When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for

a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

- If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

Who We Share Your Data With

- If you request a password reset, your IP address will be included in the reset email.

How Long We Retain Your Data

- If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.
- For members, we also store the personal information they provide in their user profile. All Members can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

What Rights you have over your data

Any Member or visitor who leaves comments can request to receive an exported file of the personal data we hold about you, including any data they have provided to us. They can also request that we erase any personal data we hold about them. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

Where your data is sent

Comments may be checked through an automated spam detection service.

13. Changes to our privacy policy

This Privacy Policy is available on our website and from the secretary. This policy may change from time to time. Members will be informed via the newsletter and the monthly meetings when any material changes are made to Saltburn District u3a policies and procedures.

14. Queries

Queries regarding this policy or use of data:

If you have any questions regarding this Privacy Policy or the way we use your personal data, please contact the SDu3a secretary or any member of the committee.

SCHEDULE 1

WHO IS PERSONAL DATA SHARED WITH?

General

- Our service providers and business partners
- Our professional advisers
- Government authorities and third parties involved in court action
- Law Enforcement and Regulation
- Police and law enforcement agencies in connection with the prevention and detection of crime
- Regulatory bodies

SCHEDULE 2

OUR SERVICE PROVIDERS AND BUSINESS PARTNERS

Name of third party –Purpose

- Third Age Trust–For Third Age Trust to provide membership support, advice and guidance
- Third Age Trust Trading Limited–For Third Age Trust Trading Limited to provide various services
- Other relevant u3as – for social activities you are signed up to.