

WHITE CLIFFS COUNTRY

PRIVACY POLICY

1. Introduction

Privacy

White Cliffs Country U3A treats your privacy rights seriously. This Privacy Policy sets out the basis on which we collect and use personal data about you.

Personal Data

In this Privacy Policy: the word Trust means White Cliffs Country u3a and the Beacon System means the membership data system operated by the White Cliffs u3a

This Policy describes:

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

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

- The White Cliffs Country u3a is the data controller for the purposes of data protection law.

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 the U3A.

The personal data we hold includes:

- your name
- home address
- email address
- telephone number
- any other data that you ask for
- your subscription and marketing preferences
- Technical information including cookies and your IP address, but nothing over and above usual website usage. 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.



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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 and this will be used in accordance with this Privacy Policy.

If you are providing personal data to us relating to a third party, it is assumed 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 comply with a legal obligation;
- it is in our legitimate interests to process your personal data.

Our reasons for using your personal data are listed below

- To set up and manage your membership
- To manage membership information on the Beacon system
- To share with the Third Age rust and TATTL to manage, develop and make improvements to the Beacon system
- To administer, plan and manage our U3A
- To monitor, develop and improve the provision of our U3A activity
- To communicate with you about our U3A services, activities and events
- To communicate with you about Trust products, services, activities and events
- To deliver Trust publications including Third Age Matters
- To comply with any legal or regulatory obligations (including in connection with a court order
- To enforce or apply the agreements concerning you (including agreements between you and us).
- To manage any issues, complaints, feedback and enquiries.



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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 and
- Third Age Trust Trading Limited and
- Service providers and business partners.
- Where we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

8. Where will we transfer your personal data?

- Within the united Kingdom.

9. 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.

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.

11. 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-



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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, member's need to inform the U3A as to any changes to their personal information. You can do this by contacting the membership secretary.

On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process.

Right to erasure of 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- 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.



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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);
- 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

12. 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.

13. Our Website

- Our website address is: <https://wcc.u3asite.uk>.
- When people leave comments on the site we collect the data shown in the comments form, and also their IP address and browser user agent string to help spam detection.



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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.



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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.

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 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
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Law Enforcement and Regulation

- Police and law enforcement agencies in connection with the prevention and detection of crime
- Regulatory bodies



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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.

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