DEFINITIONS

For the purpose of this policy, **Trust** means ***The Third Age Trust*** (charity number 288007), **TATTL** means ***Third Age Trust Trading Limited*** (company number 11899419) and with "**we**", "**our**", "**us**" or "**the u3a**" we mean "***Coleshill and District u3a***".

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

INTRODUCTION

We respect your privacy and are committed to protecting it by complying with this privacy policy ("***Policy***"). Safeguarding the data entrusted into our care by our club members, program participants, and others is of the utmost importance to us.

This policy applies to both the members of the u3a and visitors when attending our general meetings, visiting our website and when attending interest groups.

As we knowingly collect your personal data, we will do so in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ("***GDPR***") and any UK laws that implement or regulate the collection, processing and privacy of your personal data.

This policy describes the types of data we may collect from you or that you may provide and describes our policies and practices for collecting, using, protecting, disclosing and destruction of that data.

DATA WE COLLECT ABOUT YOU

We collect several types of personal data that can be used to identify you ("***Personal Data***") which will include your: name, postal address, email address, telephone number and/or other information that might identify you.

Depending on the type of interaction that you have with us, we may also collect: Gender, Birth date, Marital status, Spouse's or parents' name, Photographs/Images, etc that may be sensitive..

How we collect it

We collect data from the following sources:

- Users of our Website
- Membership of the u3a
- People who attend or participate in u3a organised events

We collect this data:

- When you become a member of a u3a
- When you use our services

- Directly when you provide it to us through any interaction offline or in person
- From our website
- From the ***Trust***
- Automatically as you navigate through our Website (data collected automatically may include usage details)
- IP addresses, and information collected through cookies and other tracking technologies
- When you participate in our programs or sign up for and/or attend any events that we host
- From third parties we contract with to provide services on our behalf, such as event organizers, travel service
- When you interact with us in another way, for example, contacting us with an inquiry

You also may provide data to be published or displayed (hereinafter, "*posted*") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "*User Content*"). Your *User Content* is posted on the Website and transmitted to others at your own risk. We limit access to certain pages and you may set certain privacy settings for this data from your account profile. However, we cannot control the actions of other Website users with whom you may choose to share your User Content.

USAGE DETAILS, IP ADDRESSES, COOKIES, ETC

As you navigate through and interact with our Website, we may automatically collect certain data about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website
- Information about your computer and internet connection, including your IP address, operating system, and browser type

You should be able to control what cookies are placed on your device through your browser settings. Go to aboutcookies.org to find out more about cookies, including how to see what cookies have been set and how to manage and delete them.

HOW WE USE YOUR PERSONAL DATA

We use your personal data that we collect or that you provide to us:

- To present our Website and its contents to you
- To provide you with information or services that you request from us
- To offer and fulfil our core purpose, which includes:
    - Fulfilling our obligation to u3a members and other individuals
    - Communicating with you via email, postal mail or by phone
    - Financial processing
    - Facilitating event planning

  - Supporting the programs and membership of the u3a
  - Complying with any legal obligations
- To fulfil any other purpose for which you provide it and have given your consent
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us
- To store information about your preferences, allowing us to customize our Website according to your individual interests
- In any other way we may tell you when you provide your personal data
- We do not use your personal data to make any automated decisions that might affect you

DISCLOSURE OF YOUR PERSONAL DATA

We may disclose aggregated data about our users or data that cannot be used to identify any individual, without restriction.

We may disclose the personal data that we collect or that you provide as described in this Policy to:

- The u3a in which you are a member
- The Trust, to meet the u3a membership and program requirements

We may also disclose your personal data:

- To comply with a court order, law, or legal process, or respond to a government or regulatory request
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of members, participants in the u3a programs and events or others

DISCLOSING YOUR PERSONAL DATA TO THIRD PARTIES

We may disclose your personal data to certain third-party organizations that are processing data solely in accordance with our instructions ("*Data Processors*"), such as companies and/or organizations that support our club business (for example; providers of web or database hosting, IT support, payment providers, event organizers, or email management service providers), as well as professionals we use such as lawyers, insurers, auditors, or accountants. We use only those Data Processors, companies and professionals that can guarantee to us that they have put adequate safeguards in place to protect the personal data they process on our behalf; these guarantees are established by entering data processing agreements that contain appropriate data transfer mechanisms or provisions where the Data Processors state they are certified under the EU-US Privacy Shield Framework.

Other than as described above, we will treat your personal data as private and will not routinely disclose it to third parties without your knowing about it. The exceptions are in relation to legal proceedings or where we are legally required to do so and cannot tell you (such as a criminal investigation). We always aim to ensure that your personal data is used only by third parties we deal with for lawful purposes and who observe the principles of any applicable Data Protection Law.

ACCESSING AND CORRECTING YOUR PERSONAL DATA

You may access and correct your data by:

- Contact us (see end of this policy) to request access to, correct, or delete any personal data that you have provided

We may choose not to accommodate a request to change or delete data if we believe the change or deletion would violate any law or legal requirement or cause the data to be incorrect.

If you delete your User Content from our Website, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of data provided on our Website, including User Content, is governed by our Terms of Use.

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.

- 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.
- 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 via the Coleshill and District u3a website.
    - On an annual basis you will have the opportunity to update your information, as required, via the membership renewal process. 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. Otherwise we will usually respond within *one month* of the request being made.
- 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
    - if your personal data needs to be erased to comply with a legal obligation
- 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
  - 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
  - when the use of your personal data is carried out by automated (i.e. electronic) means
- 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.
- You have the right to withdraw your consent at any time where we rely on consent to use your personal data.

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

RETENTION PERIOD

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.

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.

COOKIES

Our Website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.

CHANGES TO OUR PRIVACY POLICY

We may change, add, or remove portions of this Policy at any time. These modifications shall take effect immediately on being posted on our website. The date the Policy was last revised is noted at the bottom of the page. It is your responsibility to review this Policy for any changes.

This Privacy Policy is available on the *Coleshill and District u3a* website. 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 Coleshill and District u3as policies and procedures.

QUERIES

If you have any questions regarding this Privacy Policy or the way we use your personal data, please contact us as follows:

- Secretary of the u3a
- President of the u3a

Contact details are on our website: https://coleshillanddistrictu3a.org.uk

ADOPTION AND REVIEW

This policy will be reviewed as and when required due to changing circumstances, legal requirements, and other reasons.

This policy was adopted on 4 March 2025 by the u3a committee.