

Wrexham u3aData Protection Policy

Definitions:

‘Trustees’ includes Board of Trustees, Board of Directors, or Executive Committee Members.

Group Leaders: sometimes these are called Group Coordinators.

1. Policy

1.1 Scope of the policy

This policy applies to the work of Wrexham u3a. The policy sets out the requirements that Wrexham u3a has to collect and process information for membership purposes. The policy details how personal information will be collected, stored, and managed in line with data protection principles and the General Data Protection Regulation (GDPR).

The policy is to be reviewed on a biennial basis by the Wrexham u3a Trustees Committee to ensure that Wrexham u3a remains compliant with GDPR regulatory requirements.

All Trustees, on their election/appointment to the Trustees Committee, will be directed to this document on the Wrexham u3a website.

This policy should be read in conjunction with the Wrexham u3a Privacy Policy.

1.2 Why this policy exists

This data protection policy ensures Wrexham u3a:

- Complies with data protection law and follows good practice.
- Protects the rights of members.
- Is open about how it stores and processes members data.
- Protects itself from the risks of a data breach.

1.3 General guidelines for committee members and group leaders

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Wrexham u3a members.
- Wrexham u3a will provide induction training to committee members and group co-ordinators to help them understand their responsibilities when handling data.
- Committee Members and Group Coordinators should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used, and they should never be shared.

- Data should not be shared outside of the u3a unless with prior consent and/or for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided for Trust publications.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

1.4 Data protection principles

The General Data Protection Regulation identifies key data protection principles:

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner.

This means that Wrexham u3a will:

- Inform members as to which lawful basis is being used to gather their information.
- Inform members as to what their personal information will be used for.
- Inform members as to how their information will be held.

Principle 2 - Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

This means that Wrexham u3a will:

- Only use members' information for the purposes that they have previously informed them that it will be used for.
- Inform the membership and, where necessary, gain specific consent for information to be shared with external organisations (third party processors).

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

This means that Wrexham u3a will:

- Limit the information gathered from members to what is needed for membership purposes.

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

This means that Wrexham u3a will:

- Keep up to date and accurate records.
- Identify who on the committee is responsible for keeping information up to date.

Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

This means that Wrexham u3a will:

- Delete information that is no longer required for membership purposes

Principle 6 - Personal data must be processed in accordance a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

This means that Wrexham u3a will:

- Keep personal data and special categories of personal data secure.
- Discuss and agree processing arrangements with any external organisations/third party processors such as venues, travel agents, Beacon.
- Consider who within the Wrexham u3a Trustee Committee needs access to the full membership information and restrict access to those who do not need it.
- Ensure that Wrexham u3a Trustee Committee members/group coordinators who hold information delete or return all data when relinquishing their roles.

1.5 Lawful, fair, and transparent data processing

Wrexham u3a requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with the u3a.

Members will be informed as to why the information is being requested and what the information will be used for. The lawful basis for obtaining member information is due to the contractual relationship that Wrexham u3a has with individual members.

In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs, for example, in the event that Wrexham u3a wanted to use these as part of any external marketing plans to grow the group.

Wrexham u3a members will be informed who they need to contact should they wish their data not to be used for specific purposes for which they have provided consent. Where these requests are received, they will be acted upon promptly and the member will be informed as to when the action has been taken.

1.6 Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Wrexham u3a Trustees Committee will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about Wrexham u3a events and activities
- Group coordinators communicating with group members about specific group activities.
- Member information will be provided to the distribution company that sends out the Trust publication – Third Age Matters. Members will be informed and have a choice as to whether or not they wish to receive the publication.
- Sending members information about Third Age Trust events and activities.
- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.

Wrexham u3a Trustees Committee will ensure that group co-ordinators are made aware of what would be considered appropriate and inappropriate communication. Inappropriate

communication would include sending u3a members marketing and/or promotional materials from external service providers.

1.7 Your Rights

You have rights under data protection legislation (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>).

Wrexham u3a Trustees Committee will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

	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 the Wrexham u3a Trustees Committee as to any changes to their personal information. You can do this by contacting the membership secretary on membership@wrexhamu3a.uk 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 Wrexham 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.
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

	Summary of your rights
	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 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.

	Summary of your rights
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; 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. (please note that we do not currently use your personal data to make any automated decisions that might affect you – see Privacy Policy 6)
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

1.8 Adequate, Relevant and Limited Data Processing

Members of Wrexham u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number

- Gift Aid entitlement

Where additional information may be required such as health-related information this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Where Wrexham u3a organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

1.9 Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't wish to be in the photograph. Otherwise, consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact secretary@wrexhamu3a.uk to advise that they no longer wish their photograph to be displayed.

2.0 Accuracy of data and keeping data up-to-date

Wrexham u3a has a responsibility to ensure members' information is kept up to date.

Members should let the membership secretary know if any of their personal information changes. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Wrexham u3a about any changes in their personal information.

2.1 Accountability and governance

Wrexham u3a Trustees Committee are responsible for ensuring that the u3a remains compliant with data protection requirements and can evidence that it has.

Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. (If paper consent is obtained this will then be scanned in and saved securely online).

Wrexham u3a Trustees Committee will ensure that new members joining the Trustees Committee receive an induction into the requirements of GDPR and the implications for their role.

Wrexham u3a Trustees Committee will also ensure that group leaders are made aware of their responsibilities in relation to the data they hold and process.

Trustee Committee Members will stay up to date with guidance and practice within the u3a movement and will seek advice from the Third Age Trust National Office should any uncertainties arise.

Wrexham u3a Trustees Committee will review Data Protection requirements on an ongoing basis (but subject to an overall biennial review) as well as reviewing who has access to data and how data is stored and deleted.

When Trustee Committee Members and Group Coordinators relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

2.2 Secure Processing

Wrexham u3a Trustees Committee Members have a responsibility to ensure that data is both securely held and processed. This should include:

- Committee members using strong passwords.
- Committee members not sharing passwords.
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain personal information.
- Using password protection, a membership database or secure cloud systems when sharing data between committee members and/or group leaders.
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

2.3 Subject Access Request

Wrexham u3a members are entitled to request access to the information that is held by Wrexham u3a.

If any member wants this information this needs to be received in the form of a written request to the Membership Secretary of Wrexham u3a; this can be done by email and sent to secretary@wrexhamu3a.uk.

On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted.

Wrexham u3a will provide a written response detailing all information held on the member.

A record shall be kept of the date of the request and the date of the response.

2.4 Data Breach Notification

Were a data breach to occur action will be taken to minimise the harm.

This will include ensuring that all Wrexham u3a Trustee Committee Members are made aware that a breach has taken place and how the breach occurred.

The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches.

The Chair of Wrexham u3a will contact National Office as soon as possible after the breach has occurred to notify of the breach. A discussion will take place between the Chair and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Committee shall also contact the relevant u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a u3a member feels that there has been a breach by the u3a, a Committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the Committee member will ask the u3a member to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by members of the Committee who are not in any way implicated in the breach.

Where the Committee needs support or if the breach is serious, they will notify National Office. The u3a member will also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from the Wrexham u3a Trustees Committee. Breach matters will be subject to a full investigation; records will be kept and all those involved notified of the outcome.

u3a	Doc u3a KMS-POL-002 Data Protection Policy Sample	The Third Age Trust
Version	Description of changes	Date
2	Updated formatting	18/11/2021
3	Updated formatting and change from Sample to Template =	13/06/23
New 4.1	Updated Draft 1	18/05/2026
New 4.1	Update to Draft 1/ new draft 2	15/06/2026
New 4.2	Update to new draft 2	03/07/2026
	Approved Policy Document	10/07/2026