



Scottish Charity No SC037928

Data Protection and Privacy Policy and Procedure

Data Protection Policy

This policy describes the administrative procedures of Forth Valley u3a (FVu3a) in compliance with the UK General Data Protection Regulation and the UK Data Protection Act. The policy describes how personal data for membership purposes is gathered, stored and managed. The policy is reviewed by the FVu3a Board on an ongoing basis to ensure continuing compliance. The aim is to ensure that FVu3a:

- complies with data protection law and follows good practice
- only collects data where it has a “legitimate interest”
- protects the rights of members
- is open about how member data is stored and processed
- protects itself from the risks of a data breach

If you have any questions about protection of your personal data you can contact the FVu3a Data Protection Officer. You have the right to take any complaints to The Information Commissioner’s Office – Scotland (6th floor, Quartermile One, 15 Lauriston Pl., Edinburgh, EH3 9EP, Telephone: 0303 123 1115, Email: Scotland@ico.org.uk).

Data Protection Principles

Access to the data covered by this policy is restricted to those who need to communicate with or provide a service to FVu3a members. Data is not shared outside FVu3a and the national u3a office. Member information and consent are refreshed periodically via the membership renewal process. FVu3a Board members and Interest Group Coordinators keep all data secure by following good practice such as use of strong passwords, anti-malware protection and network firewalls.

FVu3a requests personal data from potential, renewing and new members for communicating their involvement in the organisation. The forms used to collect personal data indicate why the information is being requested and how the information will be used. Members are asked to provide consent to this. A record of this consent along with member information is held securely. FVu3a members can, at any time, remove their consent by contacting the FVu3a Membership Secretary.

FVu3a will ensure that member information is recorded and used appropriately, including:

- collecting only the information that is required for the operation of FVu3a
- holding such information only for such time as it is required
- communicating with members about general events and activities
- providing direct mailing information to the Third Age Trust for information about national events, activities and publications
- communicating with members about their membership
- communicating with group members about activities such as interest groups

FVu3a will ensure that member information is managed in such a way as not to infringe an individual member's rights. Were a data breach to occur, action would be taken to minimise the resulting harm and the national u3a office would be contacted promptly. All breaches would be subject to a full and recorded investigation.

Gathering and Use of General Membership Data

FVu3a members are asked to provide only information that is relevant for their membership. This includes name, postal address, email address(es), telephone number(s), communication preference and Gift Aid preference. Where additional information is required, this is obtained with the specific consent of the member. There may be occasional instances where a member's data needs to be shared with an appropriate third party (e.g. due to an accident or request by a statutory authority). Where it is in the best interests of the member or FVu3a, specific consent may not be sought for this.

Members must let the Membership Secretary know if any of their personal data changes. In addition, membership renewal forms provide an opportunity for members to resubmit their personal data and to reconfirm their consent for the specified use of this.

The Membership Secretary collects the following information through membership applications and renewals:

- name, postal and email addresses, phone number, communication preference
- Gift Aid details, membership payment record, data processing consent
- general comments, suggestions about interest groups, helping with FVu3a events
- (for new members) source of information about FVu3a, date of joining

This information is maintained securely by the Membership Secretary.

The Board

In accordance with u3a national policy, the FVu3a Board members will assume joint responsibility as "data controller" for how data is processed and managed.

The Board shall appoint a Data Protection Officer with responsibility for ensuring FVu3a complies with its legal obligations with regard to data protection.

Board members may only access members' personal data where they have a specific need for it.

Suggestions and comments about FVu3a may be summarised anonymously by the Membership Secretary and provided to Board members.

Interest Group Administrator(s)

Interest Group Administrator(s) hold a subset of membership data (name, email address, telephone number, town) about Interest Group Coordinators. With their specific consent, this will appear in the Interest Group Programme provided to members, but may also be passed to potential or current members who need more details of an interest group they wish to join.

Interest Group Coordinators

Interest Group Coordinators collect a subset of personal data through group sign-up forms. Typically, this is name, email address, telephone number and whether these details can be shared with other group members. Where the activities of a group require additional information, such as emergency contacts, this is recorded only with the specific consent of the members.

The information is required to be maintained securely by each Interest Group Coordinator and is available only to this individual. The information collected by each Interest Group Coordinator is used only for the purposes of their group. Email to a group will normally be by Bcc, i.e. be anonymous. Interest group members may agree to have their email addresses made visible to others.

The Membership Secretary may inform all Interest Group Coordinators of those whose membership has lapsed (names only). If an interest group sign-up form contains unclear or missing information, an Interest Group Coordinator may request this information from the Membership Secretary provided it is necessary for the operation of their group.

Information about previous members is kept by Interest Group Coordinators for a maximum of 12 months after someone's membership lapses or members indicate that they wish to leave the group.

Members

As part of their membership, members will become aware of personal data for other FVu3a people such as fellow members, Interest Group Coordinators and Board members. All members must treat this information as confidential and use it only for valid FVu3a purposes.

Following a request from a member for personal data held about them by FVu3a, the Data Protection Officer will respond after consultation with the Membership Secretary and relevant Interest Group Coordinators.

Members have the right to restrict the use of their data or image.

When joining or renewing membership, members are encouraged to provide details of a person who can be contacted in an emergency and to make this information available to the

Coordinator of the group/s they attend. In the event of an emergency, Coordinators will be able to access their group member's emergency contact details via the Beacon system, but only where the member has given permission.

Third Parties

A subset of membership information (name, postal address, Gift Aid details) is provided by the Membership Secretary to the Treasurer so that a Gift Aid claim can be made. His Majesty's Revenue & Customs (HMRC) requires this information to be kept for 7 years.

As a Scottish Charitable Incorporated Organisation (SCIO), FVu3a must keep a member's name and the date on which they ceased to be a member for at least six years.

A subset of membership information (name, postal address) is provided by the Membership Secretary to the u3a centrally (the Third Age Trust and its publishers) so that national publications and information about national events can be communicated to members.

Contact details of members (name, email address, telephone number) may appear with their specific consent in FVu3a publications such as the Monthly Update, but this is restricted to members only.

Members who do not wish their data to be shared with third party processors may opt out of receiving those publications for which a processor is used.

Online Data

Personal data will not be used online without the member's consent.

Data and network security for online sites are the responsibility of the hosting organisation (currently Siteworks) for the main website, Facebook and X for their respective sites).

The FVu3a website itself does not use advertising, analytics or tracking of the kind that commercial sites may employ. However, external sites linked from the FVu3a site may make use of these capabilities which are beyond the control of FVu3a. The FVu3a website may set cookies (information from a web server stored by a browser) on a user's device. The cookies used are strictly necessary for the website to function and will not be used to store any personal or identifying information. External sites linked from the FVu3a site may use their own cookies. Visits to pages on the FVu3a web site are totalled anonymously. Referring websites (e.g. search engines) are tallied. No personal information (e.g. IP address or location) is recorded. Page statistics are used by the FVu3a Board to determine which pages on the FVu3a website are the most relevant.

Photographs and Videos

Photographs and videos may be taken by FVu3a organisers at its major events. These may be used on the FVu3a web site, in its Facebook and X information, and in national u3a publications. Members (and where appropriate, non-members) will be informed at the start of an event that photographs and/or videos will be taken and, if they do not wish to appear, will be invited to move out of shot.

Where a member finds their image in a published photograph or video against their wishes, they may request that it be removed by contacting, in the first instance, their Group

Coordinator who, if unable to resolve the matter shall refer it to the Data Protection Officer for action.

Image data may be stored online indefinitely unless there is a written request to the Web Site Maintainer to remove it.

Revised Document approved by the Board– January 2026

Next review date – February 2028