

Legitimate Interest Assessment

This legitimate interest assessment has been compiled to set out the reasons why Lancaster and Morecambe u3a (L&M u3a) collects and processes membership information. This document outlines the three Legitimate Interest Assessment tests to ensure a lawful basis for collecting and processing personal information, as outlined in the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

This document forms one of 4 documents that have relevance to Data Protection and should be read alongside our Data Protection Policy, Privacy Policy, and the Retention of Records documents.

Purpose Test

Why personal data is collected.

L&M u3a requests personal data to be able to register individuals for membership. The personal data provided will also be used to communicate with members regarding the activities of L&M u3a and to keep members informed regarding any groups, activities or other relevant information relating to L&M u3a.

If a member chooses to receive copies of the Third Age Trust publication (u3a Matters), member information is shared with a third-party processor for the supply of that publication. If a member chooses to have the monthly newsletter from L&M u3a posted to their address, then information is shared with a third-party processor for distribution purposes only. Without collecting, processing and sharing data then the operations of L&M u3a and distribution of both u3a Matters magazine and our postal newsletters is not possible.

Other than this L&M u3a does not share membership information outside of the u3a. Membership information is securely held, and access is restricted to those who need to process data for membership purposes only. Storage and processing of membership data is done in line with GDPR and safeguarding requirements. L&M u3a operates with a Data Protection Policy and Privacy Guidelines and has sought advice from the Third Age Trust in developing guidance in respect of our practice in relation to data protection.

Necessity Test

Asking if we really need to process data.

L&M u3a requests minimal information from potential members which includes personal and contact details. This information is proportionate to the requirements of L&M u3a fulfilling its responsibilities in relation to being able to communicate effectively with its membership.

L&M u3a would not be able to register members or process applications without the provision of a certain amount of membership information. L&M u3a has a duty of care to its membership and needs to retain a certain amount of personal information to know who its members are, and which members are paid up members of L&M u3a.

This is necessary for meeting the requirements of the insurance provision for L&M u3a members along with the requirement of HMRC in relation to Gift Aid.

Balancing Test

Weighing up the Data Controller and Data Subjects' interests.

The personal data requested is that which is needed for registering and processing individuals as members of L&M u3a. The data requested is minimal personal data and that which is needed for communicating with members. All the data gathered is from individuals who provide the information as part of their application to join L&M u3a.

Membership expires on 31st August each year, before which time members have the option as to whether they wish to renew, as well as having the opportunity to update their personal information. Personal information can also be updated throughout the year as laid out in both the Data Protection Policy and Privacy Guidelines.

The reason for collecting personal information is explained to members at the point of joining or renewing. A copy of the L&M u3a Privacy Guidelines is available to all members who wish to have further details about how their information is used and who it is shared with. Members who are unhappy about their data being shared with third party processors can opt out of receiving those publications for which a processor is used.

Other Information

L&M u3a holds information securely and it will only be accessed by those who need to see it. Membership data will not be processed for any purpose other than in connection with an individual's membership. Communications sent will be relevant and targeted to the individual's membership activities. L&M u3a do not send marketing materials or information that does not relate to L&M u3a, however information from third parties is sent out with the u3a Matters Magazine which is under the responsibility of The Third Age Trust.

L&M u3a group leaders and other volunteers of our organisation will be informed of the importance of restricting their communications with members to that which is needed for organisation of the group. All those who process membership information for L&M u3a will receive an induction into the requirements of GDPR and the restrictions around data processing. In addition, volunteers will be informed of the need to keep data secure and restricted to those who need access to it.

Through compilation of this assessment L&M u3a considers that it has a legitimate interest to collect, hold and process membership information. This document will be held by the Committee and communicated to the membership, as required. The assessment will be reviewed periodically, and whenever there are changes to relevant legislation and regulations, to ensure that legitimate interest remains the most appropriate lawful basis for gathering membership information.

| Legitimate Interest Assessment | | | |
|---------------------------------------|--|-----------|-------------|
| Version | Description of change | By | Date |
| 1.0 | Drafted | | 28/03/2019 |
| 1.1 | Approved | | 30/05/2019 |
| 2.0 | Redrafted and revised | RAL | May 2025 |
| 2.0 | Added ref to other documents | MPH | May 2025 |
| 2.0 | Approved by Committee | | May 2025 |
| 2.1 | Word 'at' in first paragraph on page 2 changed to 'before' for precision | MPH | April 2026 |