



Privacy and Data Protection Policy

The Joseph Cowen Lifelong Learning Centre (JCLLC) processes and stores personal information in accordance with [Data \(Use and Access\) Act 2025](#)¹ which amends the [Data Protection Act 2018](#), and the [General Data Protection Regulation \(GDPR\)](#)² and, in so doing, is guided by this policy document.

General principles

According to the legislation an organisation that is responsible for using data has to follow strict rules called 'data protection principles'. They must make sure that the information is:

- used fairly and lawfully and in a transparent manner in relation to the data subject
- used for specified, explicit and legitimate purposes
- used in a way that is adequate, relevant and not excessive
- accurate and kept up to date, and inaccurate information is erased or rectified without delay
- kept for no longer than is necessary, and time limits must be established for the periodic review of the need for their continued storage
- handled in a manner that ensures appropriate security of the personal data

Accountability – this underpins the six principles above. It's about taking responsibility, having appropriate measure in place, and keeping records to demonstrate how you achieve data protection compliance.

As an organisation that is not established or conducted for profit, and that processes data relating to its members, employees, trustees, tutors and supporters only for the purposes of the organisation's activities, JCLLC is exempt from the requirement to register with the Information Commissioner's Office.

We must however ensure that we;

- only process information necessary to establish or maintain membership or support
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it, e.g. tutors and marketing list recipients
- only share the information with people and organisations necessary to carry out the organisation's activities

¹ Royal Assent on 19 June 2025, and most provisions came into force on 19 June 2026. There is a new way for charities to send electronic mail marketing that has been added to the Privacy and Electronic Communications Regulations 2003 (PECR) by the [Data \(Use and Access\) Act 2025](#).

² The GDPR is an EU law, (Regulation (EU) 2016/679 of the European Parliament and of the Council) that is no longer directly applicable in the UK, but its provisions have been incorporated into UK law as the UK GDPR.
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- only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration. This is subject to any current specific legislative duty to do so, for example, there are specific legislative provisions requiring the retention for six years of payroll and certain tax, financial and accounting data

How JCLLC stores and uses personal data

JCLLC may store and use your data to administer your membership, for the processing of financial transactions and maintaining accounts and to produce summary information for statistical, regulatory and audit purposes.

We may use your data to inform you about events and activities being run by JCLLC and other organisations, and to manage your involvement with any committees you might join. In practice, this means that we can maintain a database of names and contact details (email addresses, telephone numbers, postal addresses) for members and for people who have expressed an interest in the programme and/or membership.

We are aware that some sensitive types of personal data, sometimes referred to as 'special category data' and criminal offence data, require special protection under the legislation:³ e.g. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, a person's sex life or sexual orientation.

The information that JCLLC holds is provided personally by members (eg via online and hard copy membership forms) or by request from non-members (eg joining mailing list via website). Tutor and speaker contact details are exchanged with their individual programmer initially, before they are passed to the *Explore* office for central communications. Additional details (eg emergency contact numbers of tutors) might also be provided directly. The information is held securely and is only accessed by JCLLC staff, officers, trustees or members of JCLLC committees, who have been authorised to do so by the trustees.

Members' data is kept and used for the duration of your membership and some information may be kept by JCLLC for the purposes of managing our records. JCLLC will keep records for no longer than is necessary to meet the intended use for which they were obtained (unless there is a legal requirement). If you have asked/agreed, via our website, taster events or other medium, to be added to the *Explore* mailing list, we will occasionally email you to let you know about our offers and events that may interest you. We keep our mailing list secure as detailed above and do not share our mailing list with other parties.

Direct electronic mail marketing: 'Soft opt in' for charities

When contact details are collected the law requires that people are given a simple way to opt out of *Explore's* electronic mail marketing. The legislation generally provides that unsolicited electronic mail marketing to individual subscribers is not

³ See Articles 9 and 10 UK GDPR and Schedule 1 DPA 2018.

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permitted without their consent. However, there are certain limited exceptions, one of which is the charitable purposes 'soft opt-in'. As a charity, JCLLC is allowed to send electronic mail marketing, which is solely relevant to its charitable purposes, to members and others who support or express an interest in its work, unless they object.

Website usage and data processing

We may process data about your use of the Explore website and services "usage data". The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent. Google's privacy policy is available [here](#). The database must be kept up to date and held securely.

Any additional data (e.g. age, employment status, ethnic origin) that may be obtained for a specific purpose, such as a funding application, must not be retained for longer than is necessary for data analysis.

Third parties

Your information will not be distributed to third parties unless you give us explicit consent to do so, or we are required to do so under a statutory or legal obligation. There are a small number of occasions where we may need to share some of your information with third parties, for example, for processing payments via your bank.

Contacting you

We may need to contact you in relation to the above purposes. It is your responsibility to update your information or notify JCLLC of any changes to your personal details so that the information that JCLLC holds is accurate and kept up to date. You can do this by informing JCLLC's staff, officers, and members of the Board. We use *Mailchimp* to manage our contact lists and emails. Their privacy policy is available [here](#). We also use Eventbrite and Zoom to assist us in organizing some activities. We rely on their privacy policies; Eventbrite's is available [here](#) and Zoom's is [here](#). You have the right to opt-out of any communication you sign up for at any time by contacting JCLLC's staff, officers, and members of the Board.

Photography at events

Please be aware that photography, audio and video recording may take place at our events. These may be used for promotional purposes by JCLLC, including in printed publications, on our website, and on our social media accounts. We would always attempt to gain permissions before publishing any of this material. We are unable to guarantee, however, that you will not be included in the background of photographs that are being taken. If you would not like to be photographed or have your images used, please alert an officer or member of the Board at the start of the event. You can, of course, ask JCLLC to stop using your images at any time.

Accessing your personal data & queries

Under the legislation you have a right to change or access your information at any time. If you have any queries or want to see your personal data held by JCLLC contact any member of staff, officer, or member of the board. You may also make a formal request by submitting a subject access request, please contact JCLLC at the following email address: weareexplore@gmail.com Or by writing to: JCLLC, Explore programme, Brunswick Methodist Church, Brunswick Place, Newcastle upon Tyne, NE1 7BJ

If it transpires that any information we hold is inaccurate or incorrect, you should inform us immediately so that it can be amended.

Deletion of records

Former members can request to have their details removed from the record using the e-mail and postal addresses above. The deletion of records will be reviewed annually by JCLLC; some data of former members may be retained for legal reasons.

Data and internet security

The following precautions will be taken to ensure as far as possible the security of members' personal data.

- Only essential data are held electronically.
- Databases (e.g. Excel, Access files) are password protected
- A secure mailing management system, eg *MailChimp* is used for all mass mailings. It should be noted that the Data (Use and Access) Act 2025 will provide for a direct marketing 'soft opt in'. This will allow charities that have collected your personal information because you've supported, or expressed an interest in, their work, to send you direct marketing emails, unless you ask the charity not to.
- Members' and tutors' personal data held off-site are limited to those essential for a specific purpose, e.g. course enrolments, programme arrangements, and only for as long as necessary for that purpose.
- Following suitable consultation by the Trustees, employees and other relevant members, annual audits are undertaken of what data are held, and any unnecessary data deleted.
- When the *Explore* office is not staffed, the PCs are shut down and any relevant confidential personal data and paper records are kept locked away.
- The office PCs and laptops are protected by up-to-date security software
- Google account passwords are changed at the start of each season and are known only to those who need them. A list of who has access is kept in the office.
- If unauthorised access to the *Explore* account is suspected, the password will be changed immediately and members informed.

Data breach and complaints

A data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

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Members' complaints about data breaches must be reported at the earliest opportunity to the Data Controller for JCLLC. Such complaints must be acknowledged and responded to 'without undue delay', and in any event within 30 days of receipt. The Data Controller, working with concerned individuals, will seek to ensure that the data is no longer unsecured and take all reasonable steps to retrieve or ensure destruction of any leaked data. An investigation into the breach will identify what can be learned to ensure the breach does not reoccur and assess whether any further action, e.g. notification of the breach to the Information Commissioner's Office and the Charity Commission, is required.

The nominated Data Controller for JCLLC is a Trustee of the Joseph Cowen Lifelong Learning Centre (JCLLC), currently Emeritus Professor Trevor Buck who can be contacted at datacontroller@weareexplore.org.uk .

The following Data Protection Statement is appended to any request for personal data:

JCLLC undertakes to keep your personal information secure, and to use it only for the necessary purposes of its activities including the Explore programme. We will not pass on your information to any third party without your consent, unless there is a specific legislative duty to do so.

Update and review record

(i) Privacy Policy

Policy approved by Trustees 20th April 2018. Amended 2nd Feb 2021 to include references to Eventbrite, Mailchimp and Zoom and approved by Trustees 19th Feb 2021

(ii) Data Protection Policy

Draft created 10th November 2024, reviewed by Board of Trustees: 20th November 2024. Last reviewed by Board of Trustees: 10th January 2025

(iii) (Merged) Privacy and Data Protection Policy

Reviewed and approved by Board of Trustees: 7th November 2025

(iv) Privacy and Data Protection Policy

Last reviewed and approved by Board of Trustees: 12 June 2026