

St Albans Masorti Synagogue (SAMS)

SAMS Data Privacy Policy

Version 01.02

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1. Data Privacy Policy

1.1 *Our commitment, general provisions, lawful purpose and consent*

- a) St Albans Masorti Synagogue (SAMS) is committed to ensuring that your privacy is protected when personal information or data about you is provided to us.

This Data Privacy Policy explains:

- (i) The lawful basis for collecting and processing personal information
 - (ii) The types of personal information which we hold;
 - (iii) The purposes for which we hold personal information;
 - (iv) Who we share personal information with and why
 - (v) How long we hold personal information; and
 - (vi) What procedures we have in place to protect your privacy;
 - (vii) What rights you have.
- b) This Data Privacy Policy applies to all personal data collected and processed by SAMS Data subjects (i.e. you) and may include:
- (i) Individuals that we support through our services, including, but not limited to, our members
 - (ii) People who donate to SAMS
 - (iii) People that SAMS employs
 - (iv) People who volunteer for SAMS including our Trustees
 - (v) People who provide professional services to SAMS.
- c) Our Data Privacy Policy explains the purpose and lawful basis for us collecting personal data from you when you become one of the above people, when you provide information to us when visiting our web-site or when you make a general enquiry. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- d) For the purpose of European Union Data Protection legislation, we are the data controller.
- e) SAMS will register with the Information Commissioner's Office as an organisation that collects and processes personal data.
- f) Due to the scale and nature of data that we collect and process, we are exempt from the requirement within the GDPR to appoint a formal Data Protection Officer (DPO). However, SAMS Trustees have appointed a DPO, a voluntary role, from within the Membership to act as a focal point for the organisation and provide guidance for matters relating to the collecting and processing of personal information.
- g) The DPO with oversight from the Chair, Co-Chairs or Vice-Chair is responsible for SAMS ongoing compliance with this Data Privacy Policy.

1.2 **Lawful basis:**

- a) SAMS processes all personal data on one of the following lawful bases: consent, contract, legal obligation or legitimate interests.
- b) The basis for processing the personal data of our service users, supporters and members is legitimate interest, namely that as a community charity, we need to hold a certain amount of personal data relating to these groups so that we can provide a service and communicate with them.
- c) The basis for processing sensitive data (for example, medical information on programme participants) is explicit consent.
- d) The basis for sending electronic marketing communications to any data subjects is their consent.
- e) SAMS will seek consent for processing data and sending electronic marketing as follows:
 - (i) Members will be asked for their consent
 - a) For existing members consent will be sought by 31st December 2018
 - b) All new members joining SAMS from May 25th 2018 will be asked for consent as they join.
 - (ii) All service users and supporters will be asked to provide consent directly when registering for a programme or making a donation
- f) In the case of children aged up to 11, consent will be sought from their parents or guardians. In the case of young people aged 12 and above consent will be sought from the young people themselves.
- g) We will make available a privacy notice to all data subjects and any individual being asked to provide consent for data processing or electronic marketing.
- h) Where consent is relied upon as a lawful basis for processing data, we will keep evidence of opt-in consent with the personal data.
- i) All data subjects may withdraw their consent at any time by notice to us.
- j) Where we send communications to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and systems will be in place to ensure such revocation is reflected accurately in SAMS systems.

1.3 **What Personal Information do we hold?**

We collect information about you when you register with us or use our services. We also collect information when you participate in our events and voluntarily provide feedback. We classify this information as follows:

- a) **Personal Data:** This may include your name (current, maiden and Hebrew), address, contact details (email and phone number for example) and date of birth as well as how you relate to other members of the community.
- b) **Family Data:** We may, because of our community Membership and, where relevant, our Sunflowers children's toddler group, Process, collect information about other members of your family, including, where relevant, minors. Note that this information is only ever collected with the full permission of a parent or guardian and is only ever used for the purposes outlined in this policy. The information collected may include faith and ethnic group for our Sunflowers toddler group purposes.

- c) **Financial Data:** This may include information pertaining to bank/building society account information, income tax status and transaction data (membership fees, donations and payments for events and additional / supplementary services). If you are an employee, we hold your confidential employment information (including salary and benefits) provided in your contract plus national insurance number for HMRC purposes.
- d) **Health and Welfare Data:** This will cover where you, or a member of your family, requires increased care and support due to physical or mental health requirements, or if you have known allergies that need to be taken into consideration when planning events.
- e) **Digital Identifier Data:** Website usage information is collected using cookies (see our Cookie Policy for details).
- f) We store an archive of photographs of individuals and groups of individuals (comprising members, visitors to the community and others) taken across multiple events throughout the history of SAMS. We add new photographs to the archive after each significant event.
- g) We record CCTV images of vehicles parked (and their registration numbers where possible) in SAMS car parking spaces and all people entering, leaving and in the immediate vicinity of the Synagogue premises on our CCTV equipment.
- h) If you correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received online, mail and telephone.

1.4 For what purposes do we hold Personal Data?

- a) We hold the information that you provide to us for our own administrative services, religious services, Sunflowers toddler group sessions, Cheder services, education services, marketing, communications, event management, security management (prevention and reaction), communal and fund-raising purposes.
- b) We use your name, address, email address and telephone number to contact you in relation to the services that we offer and provide and for SAMS management purposes.
- c) We use personal information for purposes of administering our business activities, providing member and visitor services and making available other items and services to our members, prospective members and visitors.
- d) Personal information, together with certain sensitive data, may also be used by the Rabbi and the Care Group for pastoral care. They may disclose such information to community care workers, other organisations and welfare agencies for this purpose.
- e) We hold your financial data and bank account details, where relevant, to manage the Synagogue's income and expenditure and to submit our HM Government Gift Aid claim on a regular basis.
- f) We may disclose information when legally compelled to do so when we, in good faith, believe that the law requires it or for the protection of our legal rights.
- g) We use information obtained by us through users visiting our web-site, www.e-sams.org for our own administrative, Sunflowers, marketing and research and communications purposes and to personalise the website for each user.

- h) We use the photographs in our archive, that may include images of you, for marketing and communications purposes including on our public-facing web pages, Facebook page (closed Group and public facing), Twitter feed and other social media sites, e-mails and printed newsletter.
- i) We record and use CCTV images of vehicles in the car park and approaching the Synagogue premises and their vehicle registration numbers, all people entering, leaving and immediately outside and in the vicinity of the Synagogue premises for crime prevention and the prosecution of offenders. The CCTV system is intended to provide an increased level of security in the community for the benefit of those who study, work or visit the Synagogue. The CCTV system is used to respond to the following key objectives, which are subject to annual assessment:
 - (i) To detect, prevent or reduce the incidence of crime, including terrorism and antisemitism;
 - (ii) To prevent and respond effectively to all forms of harassment and public disorder;
 - (iii) To improve the operational response of security and police patrols in and around the areas where the CCTV system operates;
 - (iv) To create a safer community;
 - (v) To gather evidence by a fair and accountable method;
 - (vi) To provide assistance to emergency services;
 - (vii) To assist with health and safety

1.5 Who we share personal information with, and why?

- a) If you are a Member of SAMS, we share some of your personal information with:
 - (i) The Joint Jewish Burial Society (JJBS) for you to be registered within the JJBS scheme and for them to carry out their official duties.
 - (ii) Mercaz, where you have opted to financially support this organisation within your conditions of membership. We provide a financial "pass-thru" service for Mercaz.
 - (iii) Masorti Judaism for the purposes of demographic and statistical information, as well as to ensure that you are aware of their (NOAM) youth and key events and news. We provide a financial "pass-thru" service to Masorti Judaism.
 - (iv) The Community Security Trust (CST) which provides security support to SAMS– if you are qualified to participate in Synagogue security rotas or if we are requested to provide CCTV images to either prevent a security incident or following a security incident – as per (c) below.
- b) We share employee personal information to our supplier, "Tax Return Adviser", who perform payroll services for us.
- c) We may share CCTV images collected on our CCTV system showing people entering, leaving and in the immediate vicinity of the Synagogue with the CST.

- d) Upon formal request, we may share CCTV images collected on our CCTV system of the immediate vicinity of the Synagogue, showing visitors, members, staff or other people and their or other vehicles (and registration numbers) in the car park and approaching the premises, with the management of Borrás Limited. Such requests are in relation to enquiries from Borrás staff concerning damage to their vehicles when parked in the car parking spaces made available to them by SAMS. The personal information provided will include images of individuals and their vehicles and vehicle registration numbers. Borrás Limited may only use the information provided to pursue incidents of damage to their relevant employees' vehicles whilst parked in authorised car parking spaces.
- e) To deliver the range of services that may be relevant and applicable to you, we may, from time to time, share some of your information with employed and volunteer members of SAMS. This information will be limited to only that which is necessary for them to carry out their duty to SAMS and its community of members.
- f) Whomever we appoint to process your personal information will only be selected provided they agree to adhering to our Data Privacy Policy and the requirements of the law.
- g) If you are a SAMS Trustee and/or a specific employee or contract staff member who has been designated by the Treasurer to qualify as a "Tide Team Card" debit card holder against SAMS Tide Business Account then your date of birth and home address together with your SAMS email address will be shared with Tide Platform Limited which operates the Tide e-money account using Prepay Solutions (PPS) a trading name of Prepay Technologies Ltd.
- h) We do not share your data with any other third parties, in any form, unless requested to do so by court directive.

1.6 For how long to we hold Personal Data?

- a) We hold your personal information for as long as you are a Member of SAMS. If you have resigned your Membership we continue to hold your personal information for a period of months to the end of the current financial year after which, we retain basic information for statistical, demographic, historical and cultural archiving purposes such as names and dates of joining and leaving SAMS and details of where our families have come from and moved to. We retain your financial transactions with us for a period of seven years. Other information is deleted from our systems.
- b) For prospective members, visitors and others we retain personal information for a period of two years.
- c) We delete CCTV images after 28 days, provided they have not been requested to be used in relation to the purposes described above.

1.7 What procedures do we use to protect your privacy?

- a) We manage and process your personal information in accordance with the applicable laws on data protection. Our Data Protection Officer is responsible for overseeing adherence to our Data Privacy Policy within all aspects of SAMS.
- b) We have security procedures covering the capture, storage, processing and deletion of your personal information to prevent unauthorised access. We will always ask for proof of identity before disclosing personal information to you.
- c) We will not sell, trade, rent or otherwise transmit your personal information to any third-party organisations other than those listed at paragraph 1.5.

- d) When we provide information to the specific third parties, we will exercise the strictest control over them contractually, requiring it and any of its agents and/or suppliers to:
- maintain the security and confidentiality of the information and restrict access to those of its own employees;
 - use the data for the agreed purpose only and prevent it being used for any other purpose by any other party;
 - refrain from communicating with you other than concerning the product or service in question;
 - return the data to us at the end of any contract term and destroy or delete any copies made of all or any part of the information unless copies are needed to be kept to comply with regulations.
- e) In addition, we will restrict the information disclosed to a minimum necessary to provide the product or service.
- f) Presently, your personal information is held within a master database that is password protected and stored on our secure cloud storage infrastructure provided by Microsoft Corporation. Access to the folder where the master data base is stored is controlled by our Data Protection Officer and approved by Trustees. Our Trustees, Honorary Officers, employees, contractors and volunteer staff have approved access to the OneDrive folder on a "need-to-know" basis. An access control list is managed by our Data Protection Officer. A subset of your personal information, for example, name, telephone number and e-mail address only, is held in a separate access-controlled folder and is available for approved Trustees, Honorary Officers, employees, contractors and volunteer staff to enable them to perform their pertinent duties and responsibilities and to contact Members.
- g) No personal information is permitted to be downloaded and stored locally on users' computer equipment or other device. Each SAMS user is required to undertake and complete a GDPR training course and have auditable certification of their acknowledgement and acceptance of their personal responsibility for adhering to SAMS data protection policy.
- h) Paper versions of completed Membership application forms are scanned and stored within an access-controlled Membership Records folder within SAMS OneDrive. The paper copies are then securely destroyed.
- i) To be a Member and / or employee of SAMS you will have been asked to provide, and you will have provided, your consent to us to collect and process personal information and for that information to be stored electronically outside of the UK, EU and EEA. A documented record of your consent is stored by us electronically.
- j) At any time, you may withdraw your consent for us to hold your personal information. Further information on your rights can be found in section 1.9 below.
- k) We will also, on written request from you, amend any personal information which we hold about you.
- l) If you have submitted personal information via our website and you are under the age of 16 years old, you must provide us with the name and address of your parent or legal guardian. We will let him or her know that you are providing us with personal information and seek the necessary consents in writing from him or her.

- m) Our website may contain links to other websites. Equally, other websites may provide links to our website, www.e-sams.org. Please be aware that we are not responsible for the privacy practices of such other websites.
- n) Our CCTV system operates within a locked cabinet in the Synagogue administration office that is bolted to the wall from the inside. The office is locked when not in use. There are specific named administrators of the system who are responsible for its proper physical and logical operation and its maintenance and who are key holders for the system.
- o) All employees, freelance staff and any volunteers (including officers and trustees) who may be given access to personal data necessary for their role will be required to sign a confidentiality agreement. In the case of employees and freelance staff, this will form part of their service contract or contract of employment.
- p) All SAMS employees, freelance staff, officers and trustees will be given a data protection briefing within one month of them taking up their position and will receive regular data protection training on an annual basis.
- q) All SAMS volunteers who may be given access to personal data will receive a data protection briefing.

1.8 Complaints about a data breach

- a) When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. The complaint will be allocated to the Data Protection Officer, initially, to investigate.
- b) We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.
- c) We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

1.9 Data Breach process

- a) In case of a personal data breach that is likely to result in a risk to people's rights and freedoms, we will adhere to the mandatory regulation to report it to the Information Commissioner's Office (ICO) within 72 hours.
- b) High risk situations would be where there is the potential of people suffering significant detrimental effect such as discrimination, damage to reputation, financial loss, or any other significant economic or social disadvantage. We will need to notify the relevant supervisory authority about a loss of personal details where the breach leaves individuals open to identity theft.

- c) In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the following steps will be taken:
- (i) Any employee, freelance staff, Trustee, Officer or volunteer who becomes aware of such a breach shall inform the Data Protection Officer who will report the breach to the Chair, Co-Chair or Vice-Chair, who will inform the Trustee Board.
 - (ii) SAMS shall promptly assess the risk to people's rights and freedoms.
 - (iii) If appropriate SAMS will report this breach to the data subjects affected and to the Information Commissioner's Office (ICO).
- d) A breach notification must contain the nature of the personal data breach including, where possible:
- the categories and approximate number of individuals concerned
 - the categories and approximate number of personal data records concerned
 - The name and contact details of the data protection officer
 - A description of the likely consequences of the personal data breach
 - A description of the measures taken, or proposed to be taken, to deal with the personal data breach and, where appropriate, of the measures taken to mitigate any possible adverse effects.

1.10 What rights do you have?

- a) You have the right to access all your personal information that we hold and use. You may do this by submitting a request to dataprotection@e-sams.org. The information will be provided free of charge except where excessive, repeated or duplicate requests are made. In such a case a fee to cover the costs of administration will be made. The information will generally be provided electronically within one month of the request. Should an extension of up to two months be required we will inform you of the reason.
- b) You have the right for your data to be amended or corrected.
- c) You have the right to be forgotten. If you have withdrawn your consent for us to hold your personal information, or have resigned your SAMS Membership, you may request that all your personal information be deleted.
- d) These requests should be done in writing to dataprotection@e-sams.org, or post to SAMS Data Protection Officer, SAMS Unit 9 Dencora Centre, Campfield Road, St Albans, Hertfordshire AL1 5HN.
- e) If you are unhappy with any aspect of how your personal information has been collected and/or used, you can make a complaint to the SAMS Data Protection Officer, as per above. You can also report concerns to the national regulator, the information Commissioner's Office by phone 0303 123 1113 or other contact details can be found at <https://ico.org.uk/global/contact-us/>.

1.11 Updates to SAMS Data Privacy Policy

- a) This notice will be updated from time to time and we recommend that you check back regularly but we will always notify you of any changes through our website and through SAMS Weekly e-mails. The version number and date released will always be listed below:

Version number: 01.02

Date released: January 2020

1.12 Approval

Note, once approved, the Data Privacy Notice in section 3 will replace the Data Privacy Notice currently published on www.e-sams.org/privacy-policy-2/. A link to the full data privacy policy will be included.

SAMS Co-Chair: Darren Marks	Date: 02.01.2020
SAMS Co-Chair: Niki Freedman	Date: 02.01.2020

2. Privacy Notice

SAMS will communicate to all data subjects (you), using the following privacy statement, the purposes for, and ways, in which we are processing their data. The privacy statement will be made available to any individual from whom we are seeking consent to process data or send electronic marketing, will be published on our website, and a link to it will appear in all email communications we send out.

1. We are the Controller in respect of your personal data.
 - Our full name: St Albans Masorti Synagogue (SAMS)
 - Our contact details: 9 Dencora Centre, Campfield Road, St Albans AL1 5HN; Tel. 01727 860642; Email - info@e-sams.org; Web – www.e-sams.org
2. We are collecting your personal data for the following purposes:
 - to monitor and improve our service to you and to provide information you require as a member, supporter or service user;
 - to contact you with news, newsletters, and information about projects and events organised by SAMS or which SAMS is supporting;
 - to invite you to attend or volunteer at events, programmes and community initiatives;
 - to tell you about SAMS fundraising activities or other charities supported by SAMS and to invite you to donate.
 - We may send you emails, text messages, social media messages and hard-copy post about such activities and services, and we may on occasion telephone you. We might also contact you by email, post or phone to discuss the content of these communications with you for market research purposes.
3. The lawful basis for processing the personal data of our service users, supporters and members is that we have a legitimate interest in doing so, namely that as a community charity we need to hold a certain amount of personal data relating to these data subjects so that we can provide a service and communicate with them.
4. The lawful basis for processing any sensitive data you provide us with (for example, medical information) is explicit consent.
5. The lawful basis for sending you electronic marketing communications is your consent.
6. If we are relying on your consent to process data or send you marketing communications, you may withdraw your consent at any time by notice to us.
7. To ensure our communications with you are relevant, we may supplement our records by adding data about you from publicly-available sources of information.

8. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information. To contact you, we may provide your details to a volunteer who has responsibility for an event or activity, and if we do so, we do so on the strict basis that it is only to be used for that limited purpose. We may make your data available to third party contractors for the purpose of operating our services. Any such contractor will be required to store your data securely, use it only for the intended purpose, and to destroy it upon completion of the service for which it is being used.
9. We do not make our mailing list available to any third parties and we will not disclose your personal data to anyone else, unless required to do so by a court of competent jurisdiction or an official regulator.
10. We will keep your data secure, using up-to-date software, secure passwords and backup solutions.
11. Your personal data will be stored for the duration of your engagement with SAMS as a supporter, a service user or a member, and for up to seven years after your last interaction with us.
12. To help us communicate with you and to store data cost-efficiently, we use various third-party solutions, some of which store the data using cloud-based technologies. This means that personal data may be stored outside of the European Economic Area.
13. You have the right to request from us access to and rectification or erasure of personal data or to restriction of processing concerning you or to object to our processing of the data as well as the right to data portability.
14. You have the right to complain to the Information Commissioner's Office about the manner in which we process your personal data.
15. Your provision of personal data to us is not a contractual or legal requirement. However, should you not provide your personal data to us, we will be unable to provide a service to you or to keep you informed of SAMS programmes and activities.
16. Our full detailed Data Privacy Policy can be found on our website www.e-sams.org