NEW LONDON SYNAGOGUE DATA PROTECTION POLICY

Adopted by Council on 04.07.22.

1. Purpose

The purpose of this policy is to ensure New London Synagogue (NLS) is compliant with the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications Regulations (PECR), and best practice on data protection.

2. The legal framework

a. Article 5 of the GDPR requires that personal data shall be:

i. processed lawfully, fairly and in a transparent manner in relation to individuals.

ii. 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.

iii. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

iv. 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.

v. 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 organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

vi. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

b. The provisions of GDPR which are relevant to NLS:

i. restrict unsolicited marketing by email, text, or other electronic message. This covers all advertising or promotional material that promotes the aims or ideals of not-for-profit organizations.

ii. prohibit making unsolicited marketing phone calls to anyone who has told us they do not want our calls or who has registered with the Telephone Preference Service; and

iii. prohibit sending electronic mail marketing to individuals (including text messages, voicemails and certain messages sent over social media) unless they have specifically consented to electronic mail from us by signing up.

iv. restrict NLS sending information about its activities where people have told us they do not want to receive this specific information.

3. General provisions

a. This policy applies to all personal data processed by NLS. Data subjects may include:

   i. synagogue members and individuals that we support through our services,

   ii. people who donate to NLS,

   iii. people who NLS employs,

   iv. people who volunteer for NLS including its trustees,

   v. people who provide professional services to NLS.

b. NLS shall register with the Information Commissioner's Office as an organisation that processes personal data.
c. In view of the scale and nature of data we process, NLS is exempt from the requirement to appoint a Data Protection Officer.
d. The Operations Manager shall take responsibility for NLS's ongoing compliance with this policy.
e. This policy shall be reviewed at least annually.

4. Register of systems and data audit

a. To ensure its processing of data is lawful, fair and transparent, NLS shall maintain a register of systems and of the nature of personal data held. The register of systems shall be reviewed at least annually.

5. Lawful purposes and consent

a. All data processed by NLS must be done on one of the following lawful bases: consent, contract, legal obligation or legitimate interests.
b. The lawful basis for processing the personal data of our members, service users and supporters is legitimate interest, namely that as a community, 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. This will include letting members know about our services and events.

c. The lawful basis for processing sensitive data (for example, data on religious affiliation or medical information) is explicit consent.
d. The lawful basis for sending electronic marketing communications to any data subjects is their consent.
e. NLS shall note the appropriate lawful basis in the Register of Systems.
f. Consent for processing data and sending electronic marketing will be sought as members join, at the time members are billed and when people attend an event or make a donation.
g. When seeking this consent from members, service users and supporters, consent will also be sought for Masorti Judaism to process their data and send electronic marketing.
h. In the case of children aged up to 18, consent will be sought from their parents or guardians.
i. This policy will be made available to all data subjects and any individual being asked to provide consent for data processing or electronic marketing.
j. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
k. All data subjects may withdraw their consent at any time by notice to us.
l. Where communications are sent 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 NLS systems.

6. Procedures for secure data handling

a. Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
b. NLS shall ensure that personal data is stored securely and appropriately.
c. Secure passwords and login procedures shall be used.
d. Appropriate back-up and disaster recovery solutions shall be in place.
e. Sensitive data (including but not limited to data on religious affiliation and medical information) shall be password protected and viewed only by staff who need access in order to perform their roles.
f. Hard-copy storage of personal data will be minimised and only used where operationally necessary. Hard copy personal data will be kept in locked (where possible fire-proof) cabinets when not in use and destroyed when no longer needed.

7. Data accuracy, minimisation, retention and disposal

a. NLS shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
b. NLS shall take reasonable steps to ensure personal data is accurate.
c. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
d. Personal data will be kept for no longer than necessary. Personal data will be retained for seven years after an individual's most recent engagement with NLS, after which it

will be deleted. This will be carried out on an annual basis. This will not apply to the details of Marriages, Conversions, B'Nei Mitzvah and other lifecycle events. No sensitive information will be retained beyond 7 years.

e. When personal data is deleted this will be done safely such that the data is irrecoverable.

8. Breach procedure

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 shall be taken:

a. Any member of staff or volunteer who becomes aware of such a breach shall inform his/her line manager who shall report the breach to the Operations Manager as set out in section 3d (above).
b. NLS shall promptly assess the risk to people's rights and freedoms.
c. If appropriate NLS shall report this breach to the data subjects affected and to the Information Commissioner's Office (ICO).

9. Subject access requests

a. Individuals have the right to access their personal data.
b. Any Subject Access Request (SAR) or other request from an individual to view his/her personal data will be referred to the Operations Manager who will review the request before processing it or asking a designated member of staff to do so.
c. All SARs will be processed within one calendar month following receipt of the request.

10. Sharing data with Affiliate Organisations

a. NLS will share its membership contact data with Masorti Judaism. Before sharing this data, NLS will obtain each members' opt-in consent for Masorti Judaism to send them electronic marketing communications. All new members should be asked for this consent and existing members will be asked to renew their consent on a regular basis. No sensitive or financial information will be shared.
b. NLS will share membership data with other organisations affiliated to NLS where individual members explicitly pay fees to these organisations as part of membership fees made payable to NLS. Such organisations include Western Charitable Trust, Joint Jewish Burial Society and Mercaz. Payment of such fees shall be seen as consent for relevant data being shared. Only data directly relevant to the services provided by these affiliated organisations shall be shared.

11. Third party data processors

a. NLS will sometimes use third party data processors for the operation of services. In such cases, NLS as the data controller remains liable for compliance with data protection law.

b. Processors will only be appointed if they can provide sufficient guarantees that the requirements of the law will be met and the rights of data subjects protected.
c. Whenever NLS uses a data processor, a written contract must be in place which is compliant with GDPR and any other relevant legislation.
d. Any data processors must be appointed by the Operations Manager.

12. Staff, trustees and volunteers: confidentiality agreements and training

a. All employees, freelance staff and any volunteers (including 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.
b. All employees, freelance staff and trustees will be given a data protection briefing within one month of taking up their position and will receive data protection training on an annual basis.
c. All volunteers who may be given access to personal data will receive a data protection briefing.
d. A data protection briefing document will be made available to all staff, trustees and volunteers.

Privacy notice wording

This privacy notice is designed to help us to communicate clearly with all data subjects, the purposes and ways in which we are processing their data. It must be made available to any individual from whom we are seeking consent to process data or send electronic marketing, should be published on our website, and a link to it should appear in all email communications you send out.

1. We are the Controller in respect of your personal data.
    - Our full name: New London Synagogue (NLS)
    - Our contact details: 33 Abbey Road, LONDON NW8 0AT
2. We are collecting your personal data for the following purposes:
    - To monitor and improve our service to you, and to contact you with synagogue news, newsletters, information about events that are going on, organized by NLS, or which NLS is supporting.
    - To ask you to take part in community activities for which you have volunteered (such as *kiddush, minyan* or security rotas) or to invite you to volunteer.
    - To meet pastoral and welfare needs and to invite you to engage in community initiatives.
    - To tell you about fundraising activities that NLS is promoting and to invite you to make donations.
    - We may send you emails, text messages, other electronic messaging 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 members, service users and supporters is that we have a legitimate interest in doing so, in that as a community we need to hold a certain amount of personal data relating to members and users 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, religious affiliation or medical information) is your explicit consent.
5. The lawful basis for sending you electronic marketing communications is your consent and you providing us with your email address to keep in contact with you.
6. The recipients or categories of recipients of your personal data are: NLS staff, trustees, volunteer members and, if you give explicit consent, Masorti Judaism (including Masorti Judaism's youth movement, Noam and its young adult arm, Marom). If you are e member of one of the burial schemes associated with NLS, we will pass a limited amount of data on to that burial society.
7. 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.

8. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information. In order 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 (for example, mailing houses, tour operators). 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 other than Masorti Judaism 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 appropriate software, secure passwords and backup solutions.
11. Your personal data will be stored for the duration of your engagement with NLS as a member, supporter, or service user, and for seven years after your last interaction with us. (With the exception of the details of lifecycle events, to include conversion records, which we will continue hold in perpetuity unless you explicitly request deletion of these records).
12. In order 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 in a wide variety of international jurisdictions.
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 but your first point of contact should be the Operations Manager.

Consent Form

This wording can be used as part of your synagogue membership form or can be used as a separate paper or online/email form. If used online, it should include empty tick-boxes for people to indicate consent (pre-ticked boxes are not allowed).

Consent to send you communications

- By providing your email address and/or mobile phone number you agree that we can inform you of synagogue services and activities by email and other electronic communication pathways.

- Masorti Judaism is the umbrella organisation for all Masorti communities in the UK. Its services include our youth movement (Noam), young adult organisation (Marom), rabbinic court (Bet Din), and a range of educational and communal programmes. We'd like to make your details available to Masorti Judaism so they can send you information about their activities by email and post. This will NOT include financial or sensitive data. They will NOT be passed on to any other organisation. For more information go to www.masorti.org.uk. Please tick here to confirm your contact details to be passed to Masorti Judaism, for the purposes described above [ ].

Confidentiality Agreement for Staff and Volunteers

The following letter and form should be read and signed by any staff or volunteers who need to have access to personal data in order to contact community members:

Dear

We are writing regarding the membership data which we are going to share with you. The membership data contains personal data (names and contact details) of individuals who are currently members of New London Synagogue.

We are providing the membership data to you personally so that you can contact community members if we require you to do so. It is important that you understand and respect the confidential nature of the data and that you do not share it with anyone else.

You may download one copy only of the data to your computer and may download updated versions if we send these to you. As soon as you no longer have a need to access the membership data you must immediately delete these emails and any attachments and the files containing the data from your computer's hard drive - please check the 'downloads' folder of your computer to ensure that you have not accidentally retained a copy. Unless we have given you written permission, you may not print out the membership data.

You should be aware that the synagogue is under a legal obligation to ensure that our members' personal data is protected, not distributed and used only for specific, limited purposes which our members have consented to. In certain circumstances, the synagogue itself may be legally responsible and liable for any misuse or unauthorised disclosure of personal data by people who have been given access (including you), even where this is accidental. The synagogue and its trustees can face significant sanctions, including fines, for serious breaches of data protection law.

If at any point you believe that you no longer need access to the membership data, please inform us immediately.

Please read the attached guidelines and sign and return to the Operations Manager or send an email containing the text below to operationsmanager@newlondon.org.uk confirming your acceptance of the terms of this confidentiality agreement.

Thank you for your co-operation.

Yours sincerely,

Data protection agreement for volunteers

I have read and understood the attached letter from New London Synagogue regarding the membership data provided to me.

I agree that:

1. I will comply with all instructions and directions given to me by NLS in respect of my use of the membership data.

2. I will keep the information on the membership data confidential.
3. I will not download more than one electronic copy of the membership data to my computer.
4. Unless absolutely necessary, I will not make any paper copies of the membership data; If I need to do so, I will seek specific permission to do so from NLS.
5. I will not disclose, email or pass on the membership data to any third party.
6. I will only use the data/information contained in the membership data strictly for the purposes agreed with and specified by NLS, in accordance with the synagogue's privacy policy.
7. I will take all reasonable steps to safeguard and protect the information contained on the membership data, for example:
   - If I have been given permission by NLS to make a paper copy of the membership data, I will make sure that I do not leave or display a printed version in a public place, and I will shred it when no longer required
   - I will make sure that I do not access/display electronic versions of the membership data in public places such as on laptops or tablets on buses, tubes or trains
   - I will not upload or store an electronic version of the membership data on a file storage app or online service such as Google Drive or Dropbox
   - Any device that contains this information will be password protected to prevent unauthorised access.
8. I will promptly inform NLS when I no longer require access to membership data, and (as directed by NLS) I will return, destroy or delete printed and/or electronic versions of them, including deleting any emails from NLS with the membership data attached and all the electronic copies of the membership data from my computer's hard drive (including copies which may be saved in my 'downloads' folder).
9. I will comply with any requests received from members not to contact them or otherwise make use of their personal data and I will promptly inform NLS of such requests.
10. If I am aware that the data has become lost or that there is a possibility that it could have been hacked or accessed by a 3rd party, I will inform NLS immediately.

Signature _____ Date _____

Print Name _____