

South West Essex and Settlement Reform Synagogue (SWESRS)

Data Privacy Policy

In respect to personal data held by the synagogue

Issued Dated 10th May 2018

1. Introduction

1. We take the privacy of our synagogue member's personal information very seriously and we take reasonable care to comply with the requirements of the UK Data Protection Act 1998 ('the Act'). The general data protection regulation (GDPR) is a new EU law that will come into effect on 25 May 2018 to replace the current Data Protection Act. It's the biggest overhaul of data protection legislation for over 25 years, and will introduce new requirements for how organisations process personal data. This data relates to the personal information you (our members) supply to the synagogue in order to be a member of South West Essex & Settlement Reform Synagogue (SWESRS.) It also relates to information that we save on our database and also in regard to what is used on our website and Facebook page.

For the rest of this document the synagogue will be referred to as SWESRS.

2. We are aware that religious beliefs are considered sensitive personal data. It follows that all of the data that we hold on our Jewish members is sensitive as it is an indication of their religious beliefs.
3. Our Data Controller is the Chair of Council of SWESRS. The current main Data Processors are the Office Manager and Administrator of SWESRS. The address of the synagogue is Oaks Lane, Newbury Park, Ilford, Essex IG2 7PL.
4. This document is available on our website and by request from the synagogue office.
5. SWESRS will be operating under "Legitimate Interest" in regard to all data held and used by the synagogue. With the exception of the data required by consent. (See item 10)

2. Your Personal Data

1. The information we gather from you will include your name, address, email address, phone numbers, dates of birth, subscription rates, arrears and any other personal information you submit to SWESRS on joining and over time. We require this information in order that we can identify who you are, where you live, how we can contact you and other information that is required for membership of the synagogue i.e. proof of Jewishness or conversion.
2. We also gather information, where relevant about your children under the age of 21 years old which we need to hold in order to deliver the objectives of SWESRS e.g. the advancement of Judaism through educational activities, Bar or Bat Mitzvah and future potential membership of the synagogue.
3. We share your data with Reform Judaism for the purposes of demographic and statistical information, as well as to ensure that you are aware of their youth programmes and other major events. You have the right to opt out of this sharing of information (with Reform Judaism) by letting the synagogue office know.
4. In respect of fees we pay to the Jewish Joint Burial Society or Western Charitable Foundation on your behalf, your membership information (names, dates of birth,

address, names and details of children* under the age of 21 years old) is shared with them to allow them to carry out their duties. The burial societies never use this information for marketing purposes and nor do we pass it onto any third parties. Once someone has died they are no longer subject to the regulations and we hold the information about them indefinitely.

5. As part of your membership you will be on our mailing lists and we will send you newsletters (Alonim), calendars, birthday cards for those over 90 and announcements by email, post or flyer from time to time. These are the primary means of keeping in touch with you.
6. SWESRS issues statements on data & photographic use via our Membership Forms, Marriage Application Documents, and our Annual Trustees Report. Should you not wish your photograph to be used in the Alonim (Newsletter), on our website or on our Facebook page a copy of our consent form for completion is available from the synagogue office.
7. Issues regarding data on our Council Members are discussed with the Council Members each year after the Annual General Meeting. They can choose what they wish to disclose in the Alonim and on our website, as well as what information we can disclose to our members and some outside organisations by completing a consent form. On leaving Council every Council member is required to delete and destroy any contact information and data on members from their mobile phones, computers, laptops and tablets etc. unless further use is authorised by the synagogue Council.
8. As part of your membership we may from time to time use the information we hold to draw up and circulate lists of names to members of SWESRS committees and groups to enable them to work towards the fulfilment of the key objectives of SWESRS such as Yahrzeit Call lists for the Care Team, or contact lists for High Holiday honours, and security to ensure the safety of SWESRS members.
9. We will not sell, distribute or disclose your Information without your consent, or unless required or permitted to do so, by law. Required sensitive personal information will be held by the synagogue Officer Manager and Administrator, the Rabbi and other synagogue officers as required. This information is kept secure by those who are in possession of it.
10. We use Sage and a bespoke Access database for all accounting purposes. Between these we hold all of our member's subscription history, addresses etc.
12. Where a members has submitted a Gift Aid form to the synagogue we divulge information to Her Majesty's Revenue Collectors about membership fees and donations paid to the synagogue.
13. The database and Sage are both backed up on to USB stick and held in the synagogue office.
14. We do not retain member's bank details on our database apart from the day of the month that the payments are made. However, any member that is employed by the synagogue or spends money on behalf of the synagogue will have their bank details recorded on Lloyds Bank online system. This is to enable repeat payments to be made more easily.
15. Payments (including donations) made via debit or credit cards - card information for online payments, usually provided direct to SWESRS either by telephone or in

person, is directly passed on to our card processor (WorldPay). SWESRS discourages the submission of card details via email or hard copy.

3. Updating your Information and Retention

1. If you feel that any of your information is inaccurate or if it changes, please notify the synagogue office by email at admin@swesrs.org.uk. This includes addresses, phone numbers, email addresses, divorce and separation, new births, marriages, Conversions etc.
2. We regularly ask members via various means to revise the information we hold on them in order that the information we hold is accurate. Should members not keep us informed of changes to addresses, phone numbers, new births, divorce or separation etc. we cannot be held responsible for acting on old data. Some personal information will be saved in emails that are archived, as well as archived versions of the SWESRS database and in member's hard copy files.
3. We will retain personal information for the legally required period, e.g. 7 years for Charity Commission requirements and HM Revenue and Customs (HMRC). The synagogue's policy is to file and hold secure all membership papers and documents for those members that have ceased membership, indefinitely in our secure archive store. There are several reasons for this. Many members return to the synagogue and it is easier to re instate them if we have the documents. Children of the deceased members may wish to join the synagogue and we may have documents that they need in order to join. Some member's documentation is attached to a living member, etc.
4. A member that has terminated their membership can request to have their membership documents destroyed by contacting the Data Processor at admin@swesrs.org.uk. Should this be requested it will present problems should they wish to consider re-joining the synagogue sometime in the future. All financial data held on either Sage or the database is retained by the synagogue.
5. Any information held by the synagogue regarding arrears will be retained and passed on to another synagogue if they request it as part of their membership documentation.
6. We keep the membership records of all members who die in a secure archive. There are several reasons for this. Children of the deceased members may wish to join the synagogue and we may have documents that they need in order to join. Non-member children of members may wish to access some of the information that we have on their parents. We also retain dates of death for Yahrzeits purposes in order that we can inform family members of the deceased where applicable.
7. We keep records of 21-year olds that do not join the synagogue on reaching the age of 21. This record usually is in the form of a letter saved on the Administrator's PC. The letter is used to try and encourage the individual to join the synagogue.

4. Access to personal data

1. You have the right to obtain confirmation that your data is being processed, access to your personal data and to information corresponding to that in this privacy notice.
2. This information will be provided free of charge except where excessive, repeated or duplicate requests are made. In such a case a fee of £15.00 to cover the costs of administration will be made. Such information will generally be provided electronically or by mail within one month of the request.

5. Links to Third Parties' Sites

1. We may provide links to other websites however we do not place personal data on our website other than dates of life cycle events such as weddings, births, and deaths. We do also include photographs and information regarding family events etc. We do not accept responsibility for the protection of any data included on our website and on social media sites. Once placed on the internet photographs are difficult to remove.

6. Internet and Data Storage, CCTV

1. We do store data relating to our members on our website. We do employ the use of Cookies and you will have the option to consent or not on the website. Cookies will only be used to gain analytical data on the number of visits to the site and will not store personal data. Please remember that methods of internet communication, such as emails and messages sent via a website, are not secure, unless they are encrypted. We take no responsibility for any unauthorised access or loss of personal information that is beyond our control.
2. The synagogue has a CCTV system which records activity on our grounds and in the synagogue main building. The purpose of the CCTV is for security, monitoring general activity on the premises, and to help with any accidents and crime prevention. The hard drive on the CCTV system does get overwritten in time.

7. Complaints about a data breach

1. When we receive a complaint from a person re their data we will make up a file containing the details of the complaint. This will normally contain the identity of the complainant and any other individuals involved in the complaint.
2. 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 does not want information identifying them to be disclosed, we will try to respect this. However, it may not be possible to handle a complaint on an anonymous basis.
3. We will keep personal information contained in complaint files in line with our Grievance Policies. Information relating to a complaint will be retained for at least 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.

8. Data breach

1. In case of a personal data breach that is likely to result in a risk to people's rights and freedoms, SWESRS will adhere to the mandatory regulation to report it to the Information Commissioner's Office (ICO) within 72 hours.
2. 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. You will need to notify the relevant supervisory authority about a loss of personal details where the breach leaves individuals open to identity theft.
3. 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 our data protection officer (if SWESRS has one) or other contact point where more information can be obtained
- 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.

9. Changes to Privacy Policy in relationship to data held by the synagogue

1. Our Privacy Policy may change from time to time. If this should be the case, the amended version will be published on the SWESRS website or mailed to our members.
2. Further information about the new GDPR can be found on the ICO's website or through the link:

<https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/>

*This data is required under contract to ensure that we are able to provide a burial for you.