

Masorti Judaism Data Protection Policy

Approved by the board of trustees on 10 April 2018

1. Purpose

The purpose of this policy is

- a. to ensure Masorti Judaism is compliant with the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications Regulations (PECR), and best practice on data protection.
- b. To provide guidelines for compliance to Masorti Judaism's member communities

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 organisational 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 unauthorised or unlawful processing and

against accidental loss, destruction or damage, using appropriate technical or organisational measures.

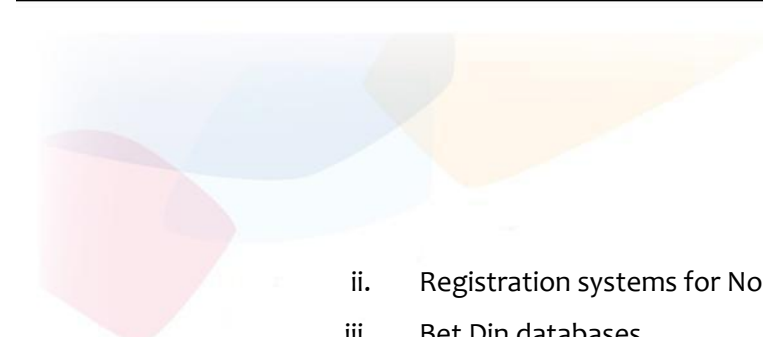
- b. The provisions of PECR which are relevant to Masorti Judaism:
 - i. restrict unsolicited marketing by fax, email, text, or other electronic message. This covers all advertising or promotional material that promotes the aims or ideals of not-for-profit organisations;
 - ii. prohibit making unsolicited 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.

3. General provisions

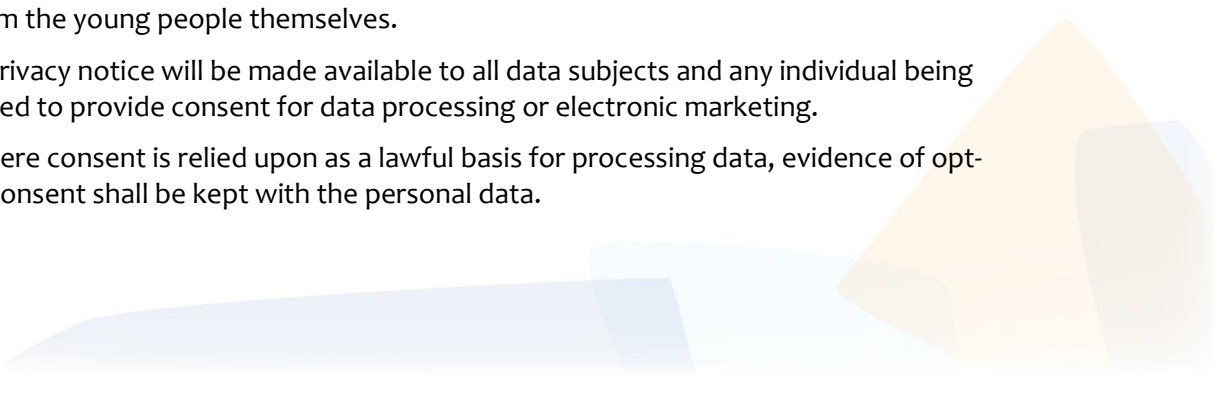
- a. This policy applies to all personal data processed by Masorti Judaism. Data subjects may include:
 - i. individuals that we support through our services – including but not limited to members of constituent and associate synagogues; Masorti Judaism, Noam and Marom programme participants; Bet Din service users,
 - ii. people who donate to Masorti Judaism,
 - iii. people that Masorti Judaism employs,
 - iv. people who volunteer for Masorti Judaism including its trustees,
 - v. people who provide professional services to Masorti Judaism.
- b. Masorti Judaism 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, Masorti Judaism is exempt from the requirement to appoint a Data Protection Officer.
- d. The Chief Executive, with oversight of a named trustee, shall take responsibility for Masorti Judaism'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, Masorti Judaism shall maintain a register of systems and of the nature of personal data held. The register of systems shall be reviewed at least annually.
- b. The following data storage systems will be audited on an annual basis to ensure compliance with this policy:
 - i. Central membership, fundraising and CRM database

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- ii. Registration systems for Noam, Marom and Masorti Judaism programmes
 - iii. Bet Din databases
 - iv. Accounting systems
 - v. Staff employment records
 - vi. E-marketing systems
 - vii. Other documents containing personal data stored on internal or cloud storage
 - viii. Hard copy documents

5. Lawful purposes and consent

- a. All data processed by Masorti Judaism 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 service users, supporters and members of constituent and associate synagogues is legitimate interest, 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.
 - c. The lawful basis for processing sensitive data (for example, medical information on programme participants) is explicit consent.
 - d. The lawful basis for sending electronic marketing communications to any data subjects is their consent.
 - e. Masorti Judaism shall note the appropriate lawful basis in the Register of Systems.
 - f. Consent for processing data and sending electronic marketing will be sought as follows:
 - i. Constituent and associate synagogues will be asked to obtain consent from their members on behalf of Masorti Judaism.
 - For existing members of constituent and associate synagogues consent will be sought by May 25th 2021.
 - All new members joining constituent and associate synagogues from May 25th 2018 should 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
 - g. 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.
 - h. A privacy notice will be made available to all data subjects and any individual being asked to provide consent for data processing or electronic marketing.
 - i. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
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- j. All data subjects may withdraw their consent at any time by notice to us.
- k. 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 Masorti Judaism's systems.

6. Procedures for secure data handling

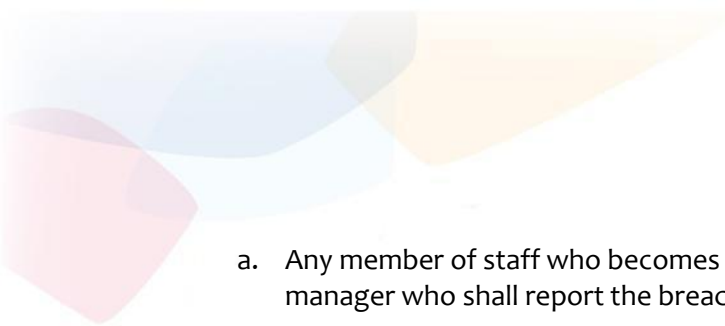
- a. Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- b. Masorti Judaism shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- c. Secure passwords, and two factor authentication will be employed where applicable for logging in to the systems used by Masorti Judaism.
- d. Appropriate back-up and disaster recovery solutions shall be in place.
- e. Sensitive data (including but not limited to Noam participants' 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 cabinets when not in use and destroyed when no longer needed.

7. Data accuracy, minimisation, retention and disposal

- a. Masorti Judaism shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Masorti Judaism 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. This includes but is not limited to requesting annual updates of membership data from constituent and associate synagogues.
- 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 Masorti Judaism, after which it will be deleted. This will be carried out on an annual basis.
- 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:

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- a. Any member of staff who becomes aware of such a breach shall inform his/her line manager who shall report the breach to the Chief Executive.
 - b. Masorti Judaism shall promptly assess the risk to people's rights and freedoms.
 - c. If appropriate Masorti Judaism 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 Chief Executive 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. Requirements of constituent and associate communities

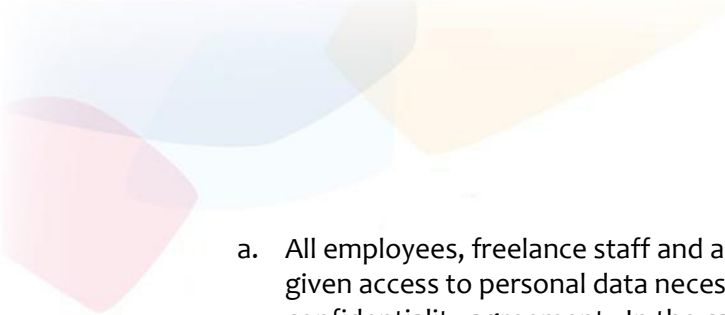

- a. Constituent and associate Masorti communities are expected to be compliant with data protection law and best practice. This requires them to have a data protection policy in place, to process data lawfully and securely and to obtain their members' consent for sending electronic marketing communications.
- b. Constituent and associate communities are expected to share their membership data with Masorti Judaism. Before sharing this data, communities are required to 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 should be asked to renew their consent on a regular basis.
- c. Masorti Judaism will provide template policies, privacy notices and other guidance to its member communities to facilitate this process.

11. Third party data processors

- a. Masorti Judaism will sometimes use third party data processors (for example, mailing houses and tour operators) for the operation of services. In such cases, Masorti Judaism 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 Masorti Judaism uses a data processor, a written contract must be in place which is compliant with GDPR and any other relevant legislation.

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

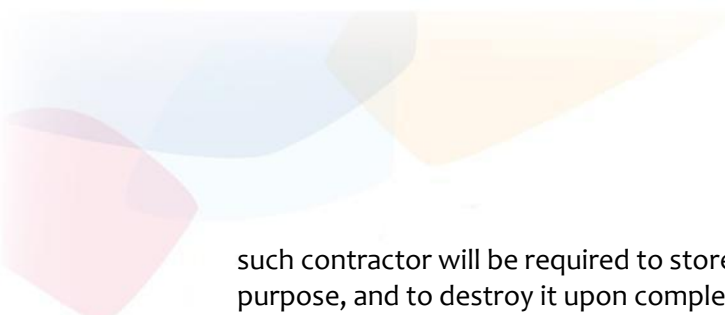


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- a. All employees, freelance staff and any volunteers (including trustees) who may be given access to personal data necessary for their role will be required to sign a confidentiality agreement. In the case of employees and freelance staff, this will 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.
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Masorti Judaism Privacy Notice

Using the following privacy statement, Masorti Judaism will communicate clearly to all data subjects 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: Masorti Judaism
 - Our contact details: Alexander House, 3 Shakespeare Road, London N3 1XE; Tel. 020 8349 6650; Email – enquiries@masorti.org.uk; Web – www.masorti.org.uk
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 Masorti Judaism news, newsletters, and information about projects and events organised by Masorti Judaism or which Masorti Judaism is supporting;
 - to invite you to attend or volunteer at events, programmes and community initiatives;
 - to tell you about fundraising activities of Masorti Judaism or other charities supported by Masorti Judaism 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 of constituent and associate synagogues 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 your 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. In order 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. 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 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 Masorti Judaism as a supporter, a service user or a member of a Masorti community, and for seven years after your last interaction with Masorti Judaism.
 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 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 Masorti Judaism programmes and activities.
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