

**SUKKAT SHALOM EDINBURGH LIBERAL JEWISH COMMUNITY (SCIO)
PRIVACY NOTICE
May 2018**

Sukkat Shalom Edinburgh Liberal Jewish Community is committed to protecting your personal data and privacy at all times. Any disclosure of your information is only with your consent, extremely limited, and the details of such sharing are laid out in this notice.

Please read this notice along with any other we may supply to you in the future. It details how your information is collected and used by us.

The contents of this notice may periodically change. Please ensure you familiarise yourself with the most recent version. This version of the policy was adopted in May 2018 and was introduced to meet the requirements of the General Data Protection Regulation.

An up-to-date copy of this policy will always be available on our website. Any future updates to it will be communicated to you by email. If for some reason we become aware we do not have a valid email address for you, we will endeavour to communicate it to you using an alternative method that may include postal communication.

If you have any questions regarding this policy or about our approach to data protection please **contact us** via our data protection officer at:

Email: dpo@eljc.org

Post: Data Protection Officer, Sukkat Shalom Edinburgh Liberal Jewish Community (SCIO),
10/1 Ainslie Place, Edinburgh, EH3 6AS

Telephone: 0131 777 8024

Our identity

Reference to “the community”, “we”, or “us” in this document is a reference to Sukkat Shalom Edinburgh Liberal Jewish Community, a Scottish Charitable Incorporated Organisation registered with the Office of the Scottish Charity Regulator with charity number SC035678, of 10/1 Ainslie Place, Edinburgh, EH3 6AS, United Kingdom.

The community is the data controller of any personal data we hold about you. This means we are responsible for deciding how we maintain and use personal information about you. We are required by law to notify you of the information in this document.

Information collected

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data which has been anonymised because the identity has been removed.

We may collect, use, store, and transfer different kinds of personal information about you. What information we collect will depend on our relationship with you, for example whether you are a member of the community, applying to become a member of the community, are a non-member participating in any programme run by the community, you assist in the

administration of the community, have applied to be on our electronic or hard copy mailing lists, are submitting an enquiry to us, or are making use of our website.

This may include:

Identity Data including name, gender, date of birth, marital status, occupation, nationality

Contact Data including home address, business address, email address, telephone number

Financial Data including bank account details and payment details

Transaction Data including details about payments to and from you

Membership Data such as application information including that related to your Jewish status, term of membership, membership history, renewal information, event attendance, preferences.

Communications Data including records of correspondence between us and you, and your preferences for receipt of communications from us.

Technical Data when using our website including the IP address used to connect your computer to the internet, browser type and version, operating system, time zones, and any plugins.

Usage Data when using our website including URL, clickstreams to and from the site, interactions, and details of how you may have contacted us including telephone numbers or email addresses.

This may include some of the **Special Categories of Personal Data** identified in legislation as “sensitive data”. The community, as a non-profit-making body with a religious aim, is permitted to hold such data under specific conditions. This means we may collect, store, and use information about:

- Your health, including any medical conditions or disabilities
- Your racial/ethnic origin
- Your religious or philosophical beliefs

How we obtain your information

Information you give us

You may give us such information directly by applying to becoming a member, becoming a member, completing forms, corresponding or speaking with us by email, phone, letter, at an event or otherwise, submitting a query, visiting our website, and when purchasing from or supplying us with any product or service.

Information we collect

When we email you such emails may contain tracking facilities. Activity may be tracked and stored for future analysis and evaluation. Such tracked activity may include (but is not limited to), the opening of emails, forwarding of emails, the clicking of links within the email, times, dates, and frequency of activity.

When you visit our website and receive emails from us we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this by using cookies. If you would like more information about cookies and how they can be used please visit: www.allaboutcookies.org/

Information we receive from others:

We may receive information about you from a qualified person who is providing the community with Rabbinic Services.

We may receive information about you from Liberal Judaism (UPLS) including its Beit Din. Liberal Judaism is the national Jewish religious body with which we are affiliated.

We also work with third parties (including for example subcontractors in payment services) and may receive information about you from them.

We may receive information if you have provided permission to other organisations to share it with us. Before providing information to third party organisations to share your personal data, you should refer to their privacy notices.

How information is used

We use information held about you:

- To consider any application for membership
- To enable you to access the provision of religious services
- To manage and administer our relationship with you
- To allow our trustees and volunteers to maintain our accounts and records
- To process and administer your request for any form of grant
- To provide you with information about our news, religious services, social events, activities, and charitable appeals
- To carry out our obligations arising from any contracts between us
- To respond to your queries and requests
- To improve the services we offer our members
- To seek your views on the services we provide and to notify you of any changes to our services
- For the purposes of the establishment, exercise or defence of legal claims
- For use by our trustees and volunteers for administrative purposes
- To ensure our website provision meets your needs
- To ensure you are receiving our communications
- To combine information about you received from different sources to be used for the above purposes

Communications between us

We may email you to provide you with information about our activities, services, and products. You can unsubscribe at any time. The process is detailed at the bottom of each email.

We may telephone you to provide you with information about our activities, services or products. You may unsubscribe by informing the person calling you or contacting us directly using the information in this document.

We may also write to you providing information about our activities, services, or products. You have the right to opt-out of postal communication. Please contact us directly using the information at the top of this document to do so.

Legal basis for data use

We process your information on the basis of “legitimate interest” recognised by data protection and privacy legislation. *This means we can process your personal data where we:*

- a) have a genuine and legitimate reason and;
- b) are not harming any of your rights and interests.

Whenever we process your personal data to support these legitimate interests, we consider any potential impact on you and your rights under all applicable legislation relating to data protection in the laws of Scotland.

There are other legal bases which we may from time to time rely on. This would include on the basis of contract in order to fulfil our obligations arising from it to you, where we are providing promotional email communication with your consent, and where we are required to comply with our legal obligations, establish or defend our legal rights, or to prevent and detect crimes such as fraud.

Where we process any of the special categories of data detailed above, we only do so with your explicit consent. We will only ever use this information without your consent in the establishment or defence of legal claims.

Should your information be used for statistical purposes it shall be anonymised.

Duration of data retention

We will hold your personal data for as long as it is necessary to fulfil the purposes that it was collected for.

Should you request deletion of your data in accordance with data protection rights basic information recording this may be retained to fulfil your request.

By law, we are required to retain certain information for prescribed periods. Where no such legal requirements exist, we determine the appropriate retention period by considering the amount, nature, and sensitivity of personal data, the potential for harm from its unauthorised use or disclosure, the purposes for which your data was being processed and whether they can be fulfilled in other ways.

As such different pieces of information may be held for varying periods of time. Retention periods are periodically reviewed.

Anonymised data may be held indefinitely.

Sharing of information with third parties

We will not sell any of your personal data to any third parties. *We may however share your data with selected third parties for legitimate purposes including:*

- Passing your information to a qualified person who is providing the community with Rabbinic Services.
- Passing your information to Liberal Judaism (UPLS) including its Beit Din. Liberal Judaism is the national Jewish religious body with which we are affiliated.
- IT Service providers.

We may disclose your information to third parties to:

- Comply with any court order or legal obligation
- Establish, exercise, or defend any legal claim.

International transfer

The data we collect from you may be transferred to and stored digitally at a destination outside the European Economic Area (“EEA”) for the purposes described in this policy.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and with data protection law.

Failure to provide data

Where we need to collect personal data by law or to otherwise fulfil the terms of any relationship with you we may not be able to permit you to participate in membership or our activities. If this should be the case, you will be advised at the time.

Your legal rights under data protection law

You have a number of rights under data protection legislation. These include (but are not limited to) rights to be provided with a copy of all personal data we hold about you, to correct any errors in your data and the right to request erasure of your data. You may object to the processing of your data, request it be transferred to another party, and a right to claim compensation for material or non-material damage caused in the event we violate data protection law. You may find a full explanation of your rights relating to data protection at <http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>

If you would like to exercise these, you may contact us using the details set out in this document. If you wish to avail yourself of them, we may need to ask for proof of identification and sufficient information about yourself so that we may identify your information. If we agree that we must disclose personal information to you or someone acting in your stead, we will provide it free of charge except where exceptional circumstances exist.

If you wish to complain about a matter relating to data protection you may contact us at any time using the particulars indicated in this document. Data Protection is regulated by the Information Commissioner’s Office (“ICO”). You may also raise a complaint with the ICO if you have concerns over how your information is being used. You may find details relating to

this on the ICO's website at <http://ico.org.uk/global/contact-us> .

Security

We implement reasonable measures to secure your data from loss and unauthorised use, alteration, or disclosure. Where we share your information with third parties as indicated in this notice they will have agreed to treat the information as confidential and to keep it to the same secure standard.

In the event of a data security breach we will notify you and any regulator where legally required to do so.

Contact

Our details are indicated at the beginning of this document. If you have any questions, wish to exercise your rights, or make a complaint please use them to contact us at your convenience.