

SPS Data Protection and Privacy Policy

CONFIDENTIALITY IS IMPORTANT TO US



1. Why we need to have this policy

A synagogue has three primary roles - worship, education and community life events (including burial). Southgate Progressive Synagogue (hereafter referred to as SPS), which is a charitable organisation, by necessity must hold information ('data') on its members and their families to fulfil these functions.

We are required to keep this confidential personal information in compliance with the Government's General Data Protection Regulation (UK-GDPR) and undertake to do so, in accordance with the SPS Privacy Notice (please see Appendix to this policy).

2. SPS statement on personal data confidentiality

SPS is defined as 'a small charity' holding a modest volume of 'non-sensitive' data on a limited number of people, the members.

The SPS Trustees understand and accept their responsibility under the UK General Data Protection Regulation (UK-GDPR) to hold all personal data securely and use it only for legitimate purposes with the knowledge and approval of the data subjects.

SPS will ensure that all personal data will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- accurate, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and kept up to date.
- erased or rectified without delay if found to be inaccurate.
- 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.
- processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Information that SPS may collect and use:

- full name
- Hebrew name if available
- date of birth / age
- home address
- contact details, including telephone numbers and email address
- communication preferences
- next of kin, in case of emergency
- gender
- marital status
- child names and school(s) attended, if relevant
- Jewish status (family and ancestry information with respect to conversions, marriages, etc.)
- occupation
- Interests and involvements
- relevant personal notes (e.g. disabilities, welfare committee input, etc.)
- Rabbinic personal notes (Rabbi only)
- burial preferences
- Yahrzeit information
- financial information (subscription payments, Direct Debits, bank details, etc.)
- Gift Aid information
- security and other rotas

4. From where this information comes to SPS:

- membership application and membership update forms
- Direct Debit Mandates / bank
- Religion School records
- employees (Rabbi, Office Manager, Ruach Administrator, Ruach teachers) and honorary office holders
- additional information given to us by individuals themselves
- family member / next of kin / power of attorney
- membership of security and/or other rotas

5. Where does SPS keep information?

A record of personal information that members have provided to SPS may be kept in one or more of the following locations / formats:

- paper membership forms (kept securely in SPS office)
- desktop / laptop PCs
- 'Xero' financial database (backed up to secure off-site servers)
- 'Infoodle' membership database (backed up to secure off-site servers)
- Microsoft Excel spreadsheet

- SPS email servers
- Microsoft Access database
- Google contacts
- cloud backup (Google or Dropbox)
- off-site hard disc data backups
- mobile phones and tablets
- by SPS security team and key holders, where relevant

6. Who has access to the data SPS holds?

The following have access to members' information held by SPS:

- Rabbinic team
- Office Manager
- Religion School head teacher *
- Religion School administrator *
- SPS Executive officers
- Membership Secretary
- Marriage Secretary
- Security Team
- Governance & Designated Safeguarding Lead
- Committee Chairs *
- members of the Welfare Committee *
- certain office holders in the community *
- other authorised members as approved by the SPS Executive

* = where appropriate

7. Does SPS share data with anyone else (externally)?

We do share certain aspects of the members' personal information that we hold, with:

- Liberal Judaism (names, birthdates, etc.)
- Funeral Director (occasional - names, addresses, phone numbers)
- As members of the Liberal Judaism movement SPS may share contact details with another LJ synagogue if it going to be used for similar purposes
- SPS communicates this data sharing by a note in each edition of 'The Bulletin' and on our membership forms, viz: ***'As a constituent member of Liberal Judaism, SPS may from time-to-time share contact information with them.'***

However,

- SPS will not share personal details with any third party unless consent has been given or there is a legal duty to disclose or share it.
- SPS does not share or buy data from third parties.

8. Correspondence and communications

We will always store and use personal information in a safe and responsible manner.

How will SPS communicate with members?

- SPS will use the contact details within our database, as provided on membership application / update forms.
- Group emails: SPS will always send information emails as blind copies where the whole community or large groups thereof are being contacted; when communicating with particular committees or small groups it may be necessary to copy in each person individually.
- SPS will always allow their number (or an alternative contact number) to be displayed to the person receiving the call.
- SPS will stop sending emails to anyone who objects or opts out of receiving them.

Member's information that will be collected and processed by SPS will always be requested by an official SPS form, email or letter on an official headed or footed document.

There are numerous SPS activities and publications that you may choose to opt into, such as regular events, how / if you receive the SPS weekly e-newsletter, the SPS monthly 'The Bulletin', and other correspondence that you can sign up to and unsubscribe from yourself.

Anyone can ask SPS to stop sending newsletters or communications by emailing or writing to the SPS Office Manager, who will remove you from the distribution lists.

If you are asked for information from someone who appears may be working or acting on behalf of SPS, but you are unsure of the legitimacy of the request, you should always check with SPS before giving any details.

9. Use of information

SPS will use the information collected only for the purposes it was collected and will not use it for any other 'incompatible' purpose.

SPS will use the information to maintain its data bases to send out information required to participate in community and synagogue activities.

Website and social media: SPS will collect information or material posted on, or contributed to, the SPS website and social media.

Other data uses:

- volunteering
- membership
- fundraising activities, if communicating by post

- general synagogue activities (e.g. helping with Kiddush, Shabbat, Festivals, courses, etc.)

SPS may also use anonymised statistics for internal and financial analysis, reporting, evaluation and quality assurance.

Once SPS has received any information, it will use strict procedures and security features to try to prevent unauthorised access.

SPS will do its best to protect your personal data but cannot guarantee the security of data transmitted to our web site; any transmission is at your own risk.

By sharing your personal data with SPS, you agree to this transfer, storing and/or processing of the same.

10. How long is the information held for?

SPS will keep your information for as long as best practice or the law allows, storing all information only for as long as it is required unless there is a legal obligation to keep it for longer.

11. Rights of individuals:

- You can revoke your consent at any time, when applicable
- You can ask to see a copy of the information we hold about you; as collating such information may be time-consuming, we reserve the right to make a charge to cover our costs.
- If you think the information we hold about you is wrong, out of date, or has parts missing, you can ask us to correct it.
- If you think we have information about you that is no longer needed, you can ask us to delete it (but we will not be able to delete it if the law says it is still required)
- You can ask that we stop some of the ways that we use your information, even if you don't want it to be deleted.
- You also have the right to contact the Information Commissioner's Office in case of any concern.

You can request any of these to be done by contacting the SPS Honorary Secretary or Office Manager and you can register complaints or queries about the use of your information in the same way.

12. Payments and subscriptions:

Where you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

We do not store your card details for use in future transactions. For more information on our PCI-DSS you can contact us at the SPS address.

13. Links to other websites

Our website may contain links to other websites run by other organisations.

This policy and privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

14. Right to correction of personal information

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you may ask us to correct it.

To exercise this right, please contact the SPS Honorary Secretary or Office Manager.

15. Right to stop or limit (restrict) our processing of your data

Individual members have the right to object to us processing their personal information for specific purposes, to have their information deleted if we are keeping it too long, or have its processing restricted in certain circumstances.

To exercise this right, please contact the SPS Honorary Secretary or Office Manager.

16. Right to Erasure

Individuals have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

To exercise this right, please contact the SPS Honorary Secretary or Office Manager.

17. Photographs, video and sound recordings

If members have given permission for - or not declined - SPS to take and use photographs, video or audio recordings SPS may use those images / recordings for promotion, display on the SPS website, on SPS social media and pass them onto SPS approved third parties for promotion of SPS.

Historical value - SPS has a long legacy and information and images that may have historical value may be archived for future reference.

Shared material: SPS can remove information or images from its own web site and social media, but it cannot remove information or images where the information has been shared and is beyond SPS's control.

18. Unforeseen circumstances

There may be situations whereby the family of a deceased member requests information of an SPS member. SPS will supply that information so long as adequate proof of relationship is provided.

19. Can one see what information SPS holds about them?

Individuals can request a copy of their personal information held by SPS, however there will be a £15 processing fee. Applications should be made to the SPS Honorary Secretary or Office Manager.

20. Can SPS delete data?

It is within your rights to have all your data deleted; however, you must understand the repercussions -

If you ask SPS to delete your contact details SPS will not be able to send you any information, in any form, for example via the weekly email, monthly Bulletin, or regarding High Holy Days, burial rights, etc. and any other special events that might be of interest to you. We may also not be able to send you subscription and other financial information which may have membership consequences.

However, SPS will operate on the UK-GDPR Lawful Basis of Legitimate Interest only to use your personal information.

This means that using your information in this way benefits you (because you get to be involved without being bothered about consenting all the time), and it benefits the Synagogue (because we will not have to ask you for consent for common sense situations where your information clearly needs to be shared with other members or organisations, i.e. if there is a situation that requires your input).

Please note that certain legal situations, such as safeguarding and Police or Government investigations, do not require your consent.

21. Live-streaming and broadcasting services and events on Zoom, Facebook and You Tube

As our default position, SPS broadcasts live most regular services via Zoom, which is protected by login credentials. This is reserved for SPS members and their families. Broadcasting into Zoom does NOT involve social media or public access. When the live Zoom session is closed at the finish of each service that is the end of it, no record remains on Zoom.

In addition to broadcasting via Zoom, we also live-stream services to the SPS Private Facebook Group, our Facebook page and our YouTube channel. In the case of the Facebook page and YouTube, these services remain available online to the public until deleted by us.

It is assumed that people attending our services give their permission for broadcast of themselves to the above media. We will always take account of requests from individuals who prefer their image not to be broadcast.

We may also broadcast other events such as Civic Services, the Harry Jacobi Memorial Lectures and other special events which may be open to a wider audience.

22. Note on Closed Circuit Television (CCTV) Recording

SPS collects CCTV images of people entering and moving around its premises in order to maintain security and safeguard its members and congregation from terrorism, theft and vandalism.

The information collected is only used where it is necessary to investigate a potential crime or other security/site access issue. It is only shared with other authorities (eg the Police or the CST), where it is appropriate to do so.

Image data is held for a period of 28 days, following which it is automatically deleted, as required by our insurers - Aviva Insurance Limited Faith Combined Policy underwritten by Q Underwriters.

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**Date:** August 2023

**Review Date:** August 2026

**Signature:** *Mark Howard Shaw*

**Printed Name:** Mark H Shaw

SPS Chair on behalf of SPS Executive and Council



Appendix

**SPS Data Privacy Notice**

Southgate Progressive Synagogue (SPS) is committed to safeguarding the privacy of our members while providing the highest possible quality of service. Under the terms of the Data Protection legislation (GDPR), we are required to explain to you how we treat any personal data we collect from you.

We take seriously our duty to protect any personal information we obtain. As a constituent member of Liberal Judaism, SPS may from to time share contact information with them. We do not pass on your details to any other third party unless you give us permission to do so.

We are committed to ensuring that your information is secure. In order to prevent unauthorized access to personal data we have put in place suitable physical and electronic procedures to safeguard and secure personal information.

In certain cases, we use your email address to send you information on services and events held at SPS or elsewhere that may be of interest to you, in which case you will be offered the option to opt in or opt out.

Whilst the SPS Council are ultimately responsible for ensuring that adequate data protection systems are in place, individual members of staff and volunteers are also responsible for ensuring the handling of all personal data in compliance with those procedures and the law.

Please contact us if your personal circumstances change or if you believe that any information we are holding about you is incorrect, incomplete, or out of date.

You are entitled to request details of personal information that we hold about you. We may charge a small administration fee for providing details. Should you wish to request a copy of your personal information, please write to our Honorary Secretary or Office Manager at Southgate Progressive Synagogue, 75 Chase Road, Southgate, London, N14 4QY.

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