

BRIGHTON & HOVE REFORM SYNAGOGUE

1. Introduction

We take the privacy of your personal information very seriously. We take reasonable care to comply with the requirements of the UK Data Protection Act 1998 ('the Act') relating to the personal information you supply to be a member of Brighton & Hove Reform Synagogue, and on the website.

2. Your Personal Data

The types of information we collect for your membership is described below. By becoming a member of Brighton & Hove Reform Synagogue, you consent to the collection and use of any personal information in the manner described. When subscriptions are renewed, re-consent may be sought to ensure compliance with the General Data Protection Regulation that applies from 25th May 2018.

The information we gather ('Information') may include your name, address, email address, date of birth and any other personal information you submit to Brighton & Hove Reform Synagogue.

This includes information about children under the age of 16, which we need to hold to deliver the educational activities required by clause 21.6 of the Constitution of the Brighton & Hove Reform Synagogue.

As Brighton & Hove Reform Synagogue is a constituent member of the Movement for Reform Judaism, we share your data with them for the purposes of demographic and statistical information, as well as to ensure that you are aware of their Youth activities, Key events and news. You have the right to opt out by informing the Synagogue at office@bh-rs.org.

In respect of fees you pay to the Synagogue for membership of the Jewish Joint Burial Society, your membership information is shared with them to allow them to carry out their charitable duties with regard to burials and funerals. In respect of children, we may provide details to educators and teachers for educational and safeguarding purposes only whether or not they are staff members.

As part of your membership, you will be on our mailing list, and we will send you newsletters and correspondence. We may, from time to time, offer you the opportunity to sign up for any other products and services which we provide. You may opt out by notifying us at office@bh-rs.org.

We use the Information we collect from you to keep you informed about events and activities, which we believe will be of interest to you. Should you not wish to receive this information, you can opt out by informing the Brighton & Hove Reform Synagogue at office@bh-rs.org.

As part of your membership, we use the Information to draw up and circulate lists of names towards fulfilment of the key objects of Brighton & Hove Reform Synagogue to practice and develop Judaism e.g. wardens list for yahrzeit purposes, or the security rota to promote the safety of Brighton & Hove Reform Synagogue members. Should

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you wish for your name not to be disclosed on these lists, please contact Brighton & Hove Reform Synagogue at office@bh-rs.org.

We will not sell, distribute or disclose your Information, including sensitive personal information that is held by the Brighton & Hove Reform Synagogue, without your consent or unless required or permitted to do so by law.

3. Use of Your data to ensure security on-line

The prolonged closure of the Synagogue premises in 2020 resulting from government restrictions on meetings and services has meant that many Synagogue activities have moved on-line. Admission to these activities, which may continue indefinitely, is necessarily protected to prevent abuse, and members' personal data will be used to enable meeting hosts to prevent unauthorised participation. They may further require that a live video image of your face is shown to aid identification.

4. Updating your Information and Retention

If any of your information is inaccurate, or if it changes, please notify us by email as above.

We retain personal information whilst you are a member of the Brighton & Hove Reform Synagogue. On a member's death the information will be retained indefinitely. On termination of membership, information primarily to enable us to confirm Jewish Status will also be retained indefinitely, but you have the right to opt out by informing the Synagogue at office@bh-rs.org.

5. Access to personal data

You have the right to obtain:

- (a) Confirmation that your data is being processed
- (b) Access to your personal data and to information corresponding to that in this privacy notice

This information will be provided free of charge, except where excessive, repeated or duplicate requests are made. In such a case, a fee to cover the costs of administration will be made.

The information will generally be provided electronically within one month of the request. Should an extension of up to two months be required, we will inform you of the reason.

6. Links to Third Parties' Sites

We may provide links to other websites. Before you supply any personal information to any other website, we recommend that you check the website's Privacy Policy.

We do not accept responsibility for the protection of any data supplied to other sites.

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7. Cookies

We may use cookies to give you a better experience and to monitor how you are using the website, as this will help us make improvements for the future.

You may refuse to accept cookies by activating the setting on your browser, which allows you to refuse the setting of cookies. Please note, that if you do so, parts of the website may not work correctly.

For more information, and to find out more about cookies and Google Analytics, read information and advice for members of the public regarding EU Cookie Laws on the UK Government's Information Commissioner's Office website.

8. Internet and Data Storage

The Brighton & Hove Reform Synagogue website uses a security system that protects your Information from unauthorised use. However, as no data transmissions over the Internet can be guaranteed to be 100% secure, we cannot take responsibility for any unauthorised access or loss of personal information that is beyond our control e.g. whilst in transit. Any data you send is at your own risk.

We have procedures and security features in place to keep your data secure once we receive it. Your data is held in the UK only and only shared with the third parties mentioned in sections 2 and 3 above.

Please remember that other 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.

9. Complaints about a data breach

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. The complaint will be allocated to a member of the Brighton & Hove Reform Synagogue Council to investigate.

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 doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 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.

10 Data breach

In case of a personal data breach that is likely to result in a risk to people's rights and freedoms, Brighton & Hove Reform Synagogue will adhere to the mandatory regulation to report it to the Information Commissioner's Office (ICO) within 72 hours.

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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. We will need to notify the relevant supervisory authority about a loss of personal details where the breach leaves individuals open to identity theft.

A breach notification must contain the nature of the personal data breach including, where possible

- (a) The categories and approximate number of individuals concerned
- (b) The categories and approximate number of personal data records concerned
- (c) The name and contact details of the data protection officer (if relevant) or other contact point where more information can be obtained
- (d) A description of the likely consequences of the personal data breach
- (e) 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

11. Changes to Privacy Policy

Our Privacy Policy may change from time to time. In this case, the amended version will be published on the Brighton & Hove Reform Synagogue website and emailed to members whose email addresses we hold.

Further information 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/>

Last Updated: 19th November 2020