

# Finchley Progressive Synagogue

## Data Protection and Privacy Notice



### 1. Introduction

At Finchley Progressive Synagogue we are committed to protecting your personal information and safeguarding the privacy of our members, website users and any individual whom we collect personal data from.

We understand the importance of maintaining individuals' privacy, keeping personal information secure and complying with all the applicable data protection laws, notably the General Data Protection Regulations (GDPR) of the Data Protection Act 2018.

FPS collect personal data or information only for identified and lawful purposes. We endeavour to limit data collection to what is necessary for the purpose for which the personal data is collected.

### 2. Data Controller

Finchley Progressive Synagogue is the data controller of any personal information you provide us, registered address: 54 Hutton Grove, North Finchley N12 8DR

We are registered with the Information Commissioner's Office (Registration Number: ZA248343)

If you are not satisfied with our use of your personal information, our response to any exercise of your rights, or if you believe us to be in breach of our data protection obligations, please contact our chairperson at: [beverley@fps.org](mailto:beverley@fps.org)

You also have the right to complain to the Information Commissioner's Office <https://ico.org.uk/concerns/>.

### 3. The information we collect and how we use it

We have a legitimate interest in collecting your personal data, so that as a Synagogue we can communicate with our members and visitors and manage their membership.

By coming to our events and services you consent to the us collecting and using your personal data as set out in this privacy notice.

#### **We collect and process personal data relating to:**

- Current and former FPS members
- Families and children attending Ivriah

- FPS employees and contractors
- FPS volunteers
- Individuals who attend FPS events and services
- Users of the FPS website, including viewers of the live stream
- Individuals who enquire about membership
- Members of the public who have contact with FPS
- Individuals who hire our venue
- Suppliers and third parties
- Individuals captured by CCTV images
- Complainants and enquirers and
- Advisors and professional experts.

We collect personal information from you and your family, through; application forms, event booking forms, event registration forms, asking to be part of a mailing list, emails, use of our website, or over the telephone.

On occasion we may be given information about you from another member or visitor of the synagogue, a family member, or third party where relevant. We would verify this information with you to ensure it is accurate. This usually happens when someone is registering a guest for an event, or reporting sickness or bereavement.

If we are given information publicly available about you from an external source or social media site, we would verify it with you first before adding it to our information.

**Personal information held (which can be provided upon request) includes;**

- Basic contact details – name, age, address, email address, telephone numbers
- Personal and family information – date of birth, family members, next of kin
- Medical information – severe allergies or medical conditions that may require support when at events or services, medical details the welfare team may need to support
- Religious information – Hebrew names, yahrzeit dates, Baby blessing dates, Bar Mitzvah dates, Kabbalat Torah dates, Marriage dates, conversion details,
- Education information – Tots and Festival Explorers participants, Ivriah attendance, B'nei Mitzvot progress, KT groups, LJY programmes, Conversion classes
- Financial information – bank and payment details, direct debit mandates, all monies paid/donated, gift aid declarations, legacy commitments.
- Information you share with us for the purposes of engaging in religious, spiritual or other learning, pastoral guidance or life cycle events.
- Sensitive (Special category) information – that may include physical or mental health details, religious beliefs and the records from DBS checks, employment details

- Membership of and payments made for the burial schemes.

**We use your personal information to enable us to complete our synagogue duties to our members and fulfil our charitable status. This will include –**

- Distributing information about services and community events, both run by us and third parties that we think will be of interest to you
- To ask you to support the administration and operation of the synagogue by taking part in community activities, including helping at services and on rotas
- Distribution of newsletters
- Meeting pastoral and welfare needs
- For fundraising and/or collecting Gift Aid
- For general promotional or marketing activities that help us improve our service to you
- To provide services appropriate for a synagogue

Contact with you may be made via email, letter, via social media, phone, text message, or WhatsApp.

If there are any changes to your Personal Data, or if you realise that we have inaccurate Personal Data relating to you, please contact us immediately.

We cannot be responsible for any difficulties arising from any inaccurate, or incomplete Personal Data that you have provided us.

We will use your information to identify groups e.g. To advertise information to someone of a particular age group, or in a set area.

A few members of FPS, who have responsibility for an event or activity, may have access to your data and may contact you., but they will only use your data for their specific volunteering role.

**Organisations that we may share your personal data with, or that process personal data on our behalf are:**

- Mailchimp
- Eventbrite
- Xero computer bookkeeping system
- Simon Silver-Myer payroll provider and bookkeeping company
- Jacky C Lax FCA, Chartered Accountants
- Jacob Charles & Co. Statutory Auditors
- Justin Baron Computer software support
- Innertech CCTV company
- Community Security Trust (CST)
- Principal Security Services Ltd
- Peninsula HR company

- MG consultants – Health and Safety Advisor
- Charity Commission
- Companies House
- The Disclosing and Barring Service
- London Borough of Barnet
- HMRC
- Liberal Judaism
- Liberal Judaism Burial Society
- Ronnie King funeral directors
- Southgate Progressive Synagogue Burial scheme

For those on the Burial Scheme, we share limited information with Ronnie King and Liberal Judaism, with whom we run the Burial Scheme. We will never give, share or trade your information to a third party unless we have your consent to do so.

#### **4. Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, e.g. 7 years for Charity Commission requirements and HM Revenue and Customs (HMRC).

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we will remove your personal data from our records seven years after the date it was collected unless different retention periods apply.

However, if before that date (i) your personal data is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it (or anonymise it) from our records at the relevant time.

We will keep some minimal member data indefinitely after membership expiry in order to comply with requests for verification of membership status that are made to us. A member that has terminated their membership can request to have this personal data destroyed and to be removed from the database by contacting [administrator@fps.org](mailto:administrator@fps.org). Please note that if all membership data is deleted (where we no longer have a legal requirement to hold it to comply with HMRC), this may present problems should you wish to consider re-joining the Synagogue or another Progressive Synagogue sometime in the future.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

Any information held by the Synagogue regarding arrears will be retained and passed on to another Synagogue if they request it with your membership documentation.

We keep the membership records of all members who die in a secure archive on the Server.

## **5. Our Membership Database**

Infoodle charity CRM, is a complete cloud-based management software system, designed for nonprofit making organisations, used for all the administration needs of the synagogue. It is frequently used by religious groups to manage people, finances and events. We also use Xero accounting software to manage membership fees and payments, which is interlinked with Infoodle enabling the systems to support each other.

## **6. Our Website**

We will ask you to consent to the use of cookies when you visit our website.

We may process data about your use of our website (“usage data”). The usage data includes - Your IP address, associated information such as geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, information about the timing, frequency and pattern of your service use and your name and email address when registering to watch the live stream.

The legal basis for this processing is our legitimate interests: namely monitoring and improving our website.

### **Cookies**

We may obtain information about your general internet usage by using a cookie which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

### **Third Party Websites**

FPS’s website may contain links to other third-party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third-party websites.

We will only put your name on the website to accompany a photograph, no other personal data.

When we upload photographs of our events and members to our website and social media profiles. Permission will be requested beforehand and these can be removed upon request.

We cannot accept responsibility for the protection of data publicly included on our website and on social media sites.

## **7. Internet and CCTV**

No data transfer over the internet is 100% secure. So whilst we try to protect your personal information, we cannot guarantee the security of any information you transmit to us.

The synagogue has a CCTV system which records activity on our grounds. The CCTV is used for security and to help with accidents and crime prevention. The CCTV is accessed by the administrator, chair and head of security. The CCTV archive footage is stored and then overwritten after 1 month. The Police and Community Security Trust (CST) may access our CCTV archives.

## **8. Emails**

When group emails are sent we will ensure they are blind copied (BCC), or get permission from the group to share people's emails before doing so.

## **9. Your rights**

### **The Right to Access your personal information**

Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you and to request details of how we use your personal information including any disclosures made.

To exercise your rights to access your personal information, please contact us at [administrator@fps.org](mailto:administrator@fps.org)

### **The Right to rectification**

We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use, but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you.

To request us to update or amend any personal information we hold about you, please contact the administrator.

### **The Right to Object**

You are entitled to object to receiving marketing material from us at any time. You can exercise this right by clicking 'update your preferences' or 'unsubscribe' on any marketing email you receive from us or by contacting us.

### **Other rights**

Under certain conditions, you may also have the right to require us to:

- delete any personal information that we no longer have a legal ground to rely on
- where processing is based on consent, to withdraw your consent so that we stop that particular processing
- object to any processing based on the legal ground of legitimate interests unless our reason for undertaking that processing outweighs any prejudice to your data protection rights
- provide you or another provider with a copy of your personal information that you provided us with; and
- restrict how we use your personal information whilst a complaint is being investigated. If you contact us to exercise any of these rights, we will confirm your right to do so and respond where possible within 1 month. For any issues relating to how we hold and process your personal data, please contact the administrator.

### **10. Data breach**

A data breach is an incident that may lead to accidental or unlawful destruction, loss, alteration, unauthorised disclosure or, or access to personal data.

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

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.

### **11. Complaints**

When we receive a complaint, we will investigate it with respect for both the complainant and the person the complaint is about. We will strive to protect personal data and privacy, but it may not be possible for this to be anonymous. Please see the complaints policy for more details. We will keep all data relating to the complaint in a secure folder on the server.