

## **BRITISH FRIENDS OF RABBIS FOR HUMAN RIGHTS**

### **PRIVACY POLICY**

#### **1 INTRODUCTION**

Welcome to the privacy policy of British Friends of Rabbis for Human Rights (“BFRHR”, “we” or “us”), a charitable incorporated organisation with Registered Charity Number 1197223.

BFRHR respects your privacy and is committed to protecting your personal data. This privacy policy explains how we collect and use your personal data and tells you about your privacy rights as well as how the law protects you.

#### **2 PURPOSE OF THIS PRIVACY POLICY**

This privacy policy aims to give you information on how BFRHR collects and processes your personal data when you sign up to our email updates, register as a member of BFRHR or if you use or access our website, including any data you may provide to us via our website when you contact us or provide us with your personal data for any other purpose.

It is important that you read this privacy policy together with any other fair processing information we may provide on specific occasions, including if you become a member, so that you are fully aware of how and why we are using your personal data.

##### **2.1 Controller**

BFRHR is the controller and responsible for your personal data (collectively referred to as “BFRHR”, “we”, “us” or “our” in this privacy policy).

##### **2.2 Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: British Friends of Rabbis For Human Rights

Registered Charity Number: 1197223

Email address: [davidbfrhr@gmail.com](mailto:davidbfrhr@gmail.com)

Postal address: Liberal Jewish Synagogue, 28 St John’s Wood Road,  
London NW8 7HA

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2.3 **Changes to the privacy policy and your personal data**

We keep our privacy policy under regular review. This version was last updated in May 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by contacting you directly.

## 2.4 **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 3 **THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about you from which you can be, either directly or indirectly, identified. It does not include data where your identity has been removed (anonymous data).

### 3.1 **We may collect, use or store some or all of the following categories of personal information about you:**

- 3.1.1 Personal identity information such as your title, name and surname.
- 3.1.2 Personal contact details such as postal addresses, telephone numbers and personal e-mail addresses.
- 3.1.3 Financial information such as bank details.
- 3.1.4 Marketing and communications information, including your preferences in receiving marketing and email updates from us and our third parties and your communication preferences.
- 3.1.5 Information about how you use our website and our email communications.
- 3.1.6 Other information such as details of previous donations to us, Gift Aid declarations and/or status and details of any preferences or feedback that you may have.

### 3.2 **We may also collect, store and use the following “special category” of more sensitive personal information:**

- 3.2.1 **Your religion**, particularly any affiliation you have with a specific congregation or congregations.

## 4 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect data from and about you which may include through:

4.1 **Direct interactions.** You may give us your personal data by filling in forms, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

4.1.1 make a donation;

4.1.2 sign up for our email updates;

4.1.3 register as a member of BFRHR; or

4.1.4 request information from us or contact us for any reason.

4.2 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

4.2.1 analytics providers such as Google Analytics;

4.2.2 our website host, Wordpress;

4.2.3 a third party who has referred to you our services or made an introduction to you;

4.2.4 third party companies or organisations where you provide permission or consent to sharing your data with charities; and

4.2.5 publicly available sources such as Companies House and newspapers/articles.

## 5 HOW WE USE YOUR PERSONAL DATA

5.1 We will only process your personal data in compliance with applicable data protection laws, and where we have a lawful basis to do so. Most commonly, we will use your personal data in the following circumstances:

5.1.1 Where we need to comply with a legal obligation.

5.1.2 Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override these interests.

5.2 We will process your personal data in the following situations:

5.2.1 where we need to process or administer your donation, including processing Gift Aid;

5.2.2 where we need to process or administer your membership of BFRHR;

5.2.3 to respond to any communications you send us;

- 5.2.4 to keep a record of your relationship with us;
- 5.2.5 to record your communication preferences and to keep in touch if you have agreed to receive communications from us.

### 5.3 Cookies

5.3.1 Our site uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our sites and services.

5.3.2 Cookies are pieces of data that are often created when you visit a website, and which are stored in the cookie directory of your computer or mobile device. A number of cookies may be created when you visit our website.

5.3.3 We use the following cookies:

(a) **Necessary cookies:** These are cookies that enable our website to work properly. You can turn these off by updating your browser settings, but please note that this may affect how the website works.

(b) **Optional cookies.** These cookies help us to understand how our site is performing. We use analytics to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, such as by ensuring that users are finding what they are looking for easily.

Optional cookies are also used for targeting and advertising. This does not store any personal information about you, but will recognise you as a unique user to allow targeted advertising on third party platforms such as Facebook and Google.

5.3.4 Please note that third parties may also use cookies, over which we have no control. These third party cookies are likely to be analytical cookies

5.3.5 We do not use cookies for any other purposes and we do not use them to collect personal data of any kind. The only personal data we do collect via our website is from the online forms you may choose to complete.

5.3.6 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### 5.4 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising for donations or other support. We will only send you electronic direct marketing communications with your consent or as otherwise authorised by applicable law.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

## 5.5 **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6 **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Our legal basis for processing special categories of personal data is that such processing is carried out in the course of our legitimate activities as a charity with appropriate safeguards in place.

We will use your particularly sensitive personal information in the following ways:

- 6.1.1 to assess the spread of BFRHR’s membership across different communities;
- 6.1.2 to determine which congregations in the UK would most benefit from events hosted by and/or educational resources provided by BFRHR;
- 6.1.3 to provide you with applicable support.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legitimate activities as a charity. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your staying with us that you agree to any request for consent from us.

## 7 **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties below for the purposes set out above.

- 7.1 Service providers acting as processors based within the EU and United Kingdom including providers of communications and system administration services.

- 7.2 Rabbis for Human Rights, an Israeli organisation with non-profit no. 580151967. Rabbis for Human Rights' address is 22 Shai Agnon Blvd, Jerusalem, 9358954, Israel.
- 7.3 Professional advisers including lawyers, bankers, auditors and insurers based in the EU and United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- 7.4 HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances, including the Charity Commission where required.
- 7.5 Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers or partners to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **8 INTERNATIONAL TRANSFERS**

- 8.1 We may transfer personal information we collect about you to countries outside the United Kingdom and the European Union. Where required by applicable law we will put in place applicable data transfer mechanisms to ensure that your personal data received essentially equivalent protections in any country to which it is transferred as if received in the United Kingdom. If you require any additional information on how your information may be shared please use the contact details in clause 1 of this policy.

## **9 DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will only pass on your information to another organisation, including Rabbis For Human Rights, where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 10 DATA RETENTION

### 10.1 How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Subject to the above considerations, our data retention periods are as follows:

- Physical records of donations: seven (7) years.
- Electronic records: duration of the relationship with the member and/or donor, and for seven (7) years following the later of the last payment of the membership fee or donation.
- Gift Aid information: retained unless removal is requested.

In some circumstances you can ask us to delete your data, see your legal rights below for further information.

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

## 11 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

### 11.1 Your legal rights include:

11.1.1 Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

11.1.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

11.1.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with

your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 11.1.4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.1.5 Request restriction of processing of your personal data in certain circumstances.
- 11.1.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 11.1.7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- 11.1.8 If you wish to exercise any of the rights set out above, please contact us.

## 11.2 **Automated decision making**

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We do not currently take any decisions and do not envisage that any decisions will be taken about you using automated means.

## 11.3 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.