

Transparency Notice Northwood and Pinner Liberal Synagogue

1. About Us

- a. We are Northwood and Pinner Liberal Synagogue (“NPLS” or “We”).
- b. We are a data controller. This means that we process personal data that relates to a living individual who can be identified from that data. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).
- c. We adhere to a strict policy of privacy by design and we are committed to protecting and respecting your privacy.
- d. We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.
- e. We have appointed a **data privacy manager** to oversee our data protection compliance. If you have any questions about this transparency notice or how we handle your personal information, please contact us at datacontroller@npls.org.uk or write to us at Data Privacy Manager, NPLS, 18-24 Oaklands Gate, Northwood, HA6 3AA.
- f. We are committed to being clear, transparent and concise at all times so if there is anything in this document that is unclear, please contact our data privacy manager.
- g. We reserve the right to update this transparency notice at any time, and we will provide you with a new transparency notice when we make any substantial updates.

2. Our legal basis for processing your personal data

- a. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:
 - i. Where we need to perform the **contract** we have entered into with you,
 - ii. Where we need to comply with **legal obligation**,
 - iii. Otherwise with your **consent**.

3. What information do we hold

- a. We hold different information based upon your relationship with us
- b. Most commonly we hold data that you have provided to us via an application form (i.e. membership, cheder enrolment, employment enrolment) in order to allow us to perform the contract we have entered into with you
 - i. Basic details including: name, contact details (address, phone, email address), date of birth – occupation details may be held with your consent
 - ii. Banking details including: bank account number and sort code
 - iii. Gift Aid details
 - iv. For members who have applied for a subscription subsidy, we will keep redacted copies of the application forms in a password protected folder
 - v. For our cheder students, we will also hold educational details including year group, learning support needs, medical conditions including allergies and emergency contact details
 - vi. Right to work details
 - vii. Because we are a synagogue, we may hold what is defined as **special category data**, in our case, specifically data that relates to religion and possibly sexual orientation
- c. When your relationship with us ends, we will remove your personal data within 30 days except where we have the legal obligation to retain your information such as for safeguarding, financial regulations and Gift Aid purposes. Where we have a legal obligation to retain your personal data, we will only retain the data that is required for legal purposes.

- d. Where you undertake work (paid or voluntary) with vulnerable adults or children and are required to have a DBS (Disclosure and Barring Service) Check, we will keep a record of your name, email address, date of birth, DBS Certificate number and date of issue in line with current legal requirements.
- e. We may also hold data provided on a booking form for the Northwood Venue relating to booking our premises for an external letting. Generally this is limited to name, contact details (address, phone, email address).
- f. For individuals who are not members/friends, cheder participants, staff or Northwood Venue lessees, we may hold contact details for you, but only with your consent. This is usually for individuals who would like to receive emails from us with details of our weekly events or bi-monthly magazine.

4. Who do we share your personal data with

- a. We will never sell your data to anyone.
- b. We periodically provide LJY-Netzer with contact details about parents of children who are of the appropriate age for their events.
- c. We provide LJ with the name, date of birth, gender, date of joining NPLS and funeral preference for each member over the age of 21.
- d. Northwood Holocaust Memorial Day Events is a joint venture on behalf of NPLS and Northwood United Synagogue so members of their committees may contact our members.
- e. Where we share information with other data controllers (such as HMRC), they are responsible to you for their use of your information and compliance with the law.
- f. The following activities are carried out by third-party service providers on our behalf: IT support and maintenance; hosting our website (including analytics); email distribution of weekly updates; email distribution of bereavement notices; email distribution of cheder updates, cloud data storage and confidential waste disposal.
- g. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.
- h. When you take part in our activities we may (where appropriate in the context of publishing and reporting on such activities) publish your information (including photographs or videos which feature you) on our website and web-based photo hosting, and in publications such as 'Davar' (or any additional or replacement magazine or other publication for members) and our annual report. If you would rather not have your personal details published in this way, then please let us know and we will aim to ensure that it does not happen.

5. Transferring information outside the European Economic Area (EEA)

- a. All our personal information is hosted on servers located within the EEA.
- b. If we are required to transfer information outside the EEA, we have put in place the appropriate measures (see Data security below) to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.
- c. If you are based outside the EEA we may transfer personal information to the correspondence address you provide to us. We will take all reasonable steps to ensure that such transfers are secure. By instructing us from outside the EEA you acknowledge and agree that such transfers are necessary for us to provide services to you.

6. Data security

- a. We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- b. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- c. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, volunteers, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- d. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. How long will we keep your personal information for

- a. We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- b. Where a minimum retention period is required by law (such as retaining records for HMRC purposes or for compliance with the Charity Law requirements), we comply with that minimum period plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes.

8. Your rights relating to your personal information

- a. You have a right to:
 - i. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - ii. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - iii. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
 - iv. Withdraw consent in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose. You have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.
- b. If you wish to exercise any of the above rights, please contact datacontroller@npls.org.uk or write to us at Data Privacy Manager, NPLS, 18-24 Oaklands Gate, Northwood, HA6 3AA.
- c. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- d. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9. Contacting the regulator

- a. If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.
 - i. You can contact them by calling 0303 123 1113.
 - ii. You can go online to www.ico.org.uk/concerns (please note we can't be responsible for the content of external websites)
 - iii. If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

10. Any questions

- a. We hope this notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our data privacy manager who will be pleased to help you:
 - i. Email us at datacontroller@npls.org.uk
 - ii. Or write to us at Data Privacy Manager, NPLS, 18-24 Oaklands Gate, Northwood, HA6 3AA