Chabad Lubavitch UK - Privacy Policy

A. Chabad Lubavitch UK - Privacy Policy

The Chabad Research Unit is a division of the larger Chabad Lubavitch UK. Chabad Lubavitch UK takes the privacy and security of your personal information very seriously. Any personal data collected by Chabad Lubavitch UK will only be processed in accordance with this privacy policy.

This privacy policy sets out how Chabad Lubavitch UK processes personal data (that is, information by which an individual can be identified) collected by us in the course of our lawful activities, in accordance with the Data Protection Act 1998 and any subsequent legislation ('Data Protections laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this. If you want to discuss any matter relating to how your data is used, please call us on 020 8800 0022, ext. 3007, email cru@lubavitchuk.com or write to the Data Protection Officer, Chabad Lubavitch UK, 107-115 Stamford Hill, London N16 5RP. In some cases we may be obliged to ask that a formal request be submitted in writing.

References to the processing of information includes the collection, use, storage and protection of data. Chabad Lubavitch UK is the 'data controller' for the purposes of this policy, and the policy extends to its staff, trustees, volunteers and anyone else processing data on our behalf from time to time.

Organisations are permitted to process data if they have a legal basis for doing so. Chabad Lubavitch UK processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- Chabad Lubavitch UK has a legitimate interest in processing the data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or
- There is a legal obligation on Chabad Lubavitch UK to process data.

Where Chabad Lubavitch UK is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which Chabad Lubavitch UK is able to provide services to or interact with you in future.

Chabad Lubavitch UK may change this policy from time to time and any such changes will be published on our website. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy is effective from 20 March 2018.

B. What data do we collect?

We collect the data necessary for Chabad Lubavitch UK to pursue its charitable objectives, including but not limited to the advancement and promotion of the Jewish religion by

providing education and resources for the study of and instruction in the rites and practices of the Jewish religion and, in that connection, to promote and raise funds for any of the charitable purposes for which the organisation was formed. Accordingly, data will be processed for operational purposes, fundraising and marketing, running events, keeping our supporters informed of our activities and the effective running of Chabad Lubavitch UK through its professional staff, trustees and volunteers. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses
- Details and preferences of those attending events or participating in Chabad Lubavitch UK educational, religious or social programmes
- Details relating to staff and volunteers to enable Chabad Lubavitch UK to utilise their services and, where appropriate, remunerate them accordingly
- Donor and volunteer records and preferences, including, where necessary, bank or payment details in order to process payments and information provided about an individual's tax status for the purposes of collecting Gift Aid
- Such other information as is relevant and necessary for Chabad Lubavitch UK to carry out its activities, charitable purposes and legal obligations to beneficiaries, staff and others.

C. What we do with the data we process

Chabad Lubavitch UK uses the data collected to maintain accurate internal records of our engagement with beneficiaries, supporters, volunteers, staff and others. These records facilitate our activities run in accordance with our charitable objects, providing services to beneficiaries, communicating with our supporters and raising funds and awareness about our work through campaigns and events. Data may be processed and viewed by the relevant staff, trustees and volunteers in the course of Chabad Lubavitch UK's activities (all of whom work in accordance with this privacy policy) and will be retained only for as long as is reasonable, necessary and permissible in law. We may use your personal information to send you information about Chabad Lubavitch UK and matters relating to Chabad Lubavitch UK's activities and the projects we support which we think may be of interest to you.

We will only share data with trusted third parties where necessary for us to deliver educational or other services to you, to communicate with you (such as mailing companies for postal communications or web platforms such as chabad.org for email campaigns or newsletters), for processing payments, event management or as otherwise stated above, and only once we are satisfied that any such use of data will accord with our privacy policy and standards of data privacy and security. We will not sell or share your personal information with any other charities, businesses or marketing companies without your explicit consent.

If we share your data with colleagues or trusted partners outside of the European Union, such as our project and programme partners within the worldwide Chabad Lubavitch movement, we will only do so if we are confident that they adhere to the same high standards that we do when processing data and protecting its privacy and security.

Where required by law or a legal obligation, we may, if necessary, share your data with the appropriate authorities, for example, to prevent the commission of an offence or to facilitate its investigation, or to safeguard a vulnerable individual.

You, as the data subject, may change your preferences or request deletion of your data at any time in writing, subject to any overriding legal requirement for its retention, such as the need, where appropriate, to retain Gift Aid records for Her Majesty's Revenue and Customs. We may keep such data on a 'suppression list' so we know not to contact you or process your data in future until further notice.

D. Your rights in relation to your personal data

You may request details of personal information which we hold about you. Any such request must be submitted in writing. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may inhibit or limit the way in which Chabad Lubavitch UK is able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on Chabad Lubavitch UK to retain data.

You are responsible for the accuracy of data you have provided to Chabad Lubavitch UK. If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: <u>https://ico.org.uk/for-thepublic</u>.

E. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of Chabad Lubavitch UK do so in accordance with this policy and on the basis that Chabad Lubavitch UK is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You are responsible for keeping the password you use for accessing our website (if applicable) confidential; we will not ask you for your password (except when you log in to our website).

F. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type. This is anonymous statistical data about your browsing activities and patterns, and does not contain any personal data.

G. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.