

# JVMUK Data Protection Policy

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## Scope of the Policy

This policy applies to the work of Jewish Voice Ministries UK (hereafter 'JVMUK '). The policy sets out the JVMUK's requirements for gathering personal information for donor-ship and correspondence purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy will be reviewed on an ongoing basis by JVMUK Board to ensure compliancy. This policy should be read in tandem with the JVMUK Privacy Policy.

## Why This Policy Exists

This data protection policy ensures that JVMUK:

- Complies with data protection law and follows good practice.
- Protects the rights of donors, contacts, customers and partners.
- Is open about how it stores and processes individual's personal data.
- Protects itself from the risks of a data breach.

## General Guidelines for Data Management

- The only people able to access data covered by this policy should be those assigned to communicate with or provide a service to donors, contacts, customers and partners of JVMUK.
- Data shall not be shared informally or outside of JVMUK, except for vendors as required to perform functions on behalf of JVMUK, such as mail distribution.
- All data shall be kept secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Donor information should be reviewed and consent refreshed periodically.

## Data Protection Principles

The General Data Protection Regulation identifies 8 data protection principles.

Principle 1 Personal data shall be processed lawfully, fairly and in a transparent manner.

**Principle 2** Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

**Principle 3** The collection of personal data must be adequate, relevant and limited to what is necessary compared with the purpose for which data is collected.

**Principle 4** Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay.

**Principle 5** Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

**Principle 6** Personal data must be processed in accordance with the individual's rights.

**Principle 7** Personal data must be processed in a manner that ensures appropriate security of said personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

**Principle 8** Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

## Lawful, Fair and Transparent Data Processing

JVMUK requests personal information from donors, contacts, customers and partners for the purpose of communications about their involvement with JVMUK. Forms used to request personal information will contain a privacy statement explaining why the information is being requested, and for what it will be used. This personal data can be requested to be deleted by the individual at any time by contacting JVMUK to obtain and sign the required authorization form. Once an individual has requested that his/her data be removed, this will be acted upon promptly.

## Processed for Specified, Explicit and Legitimate Purposes

Donors will be informed as to how their information will be used, and the Board of JVMUK will seek to ensure that donor information is not used inappropriately. Appropriate use of information provided by donors will include:

- **Communicating with donors, contacts, customers and partners about JVMUK's events and activities.**
- **Communicating with donors, contacts, customers and partners about specific issues and needs.**

**JVMUK will ensure that donors, contacts, customers and partners are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending donors, contacts, customers and partners marketing and/or promotional materials from external service providers, except as required to perform functions on behalf of JVMI, such as mail distribution.**

**JVMUK will ensure that donors' information is managed in such a way as to not infringe an individual donors' rights which include:**

- **The right to be informed.**
- **The right of access.**
- **The right to rectification.**
- **The right to erasure.**
- **The right to restrict processing.**
- **The right to data portability.**
- **The right to object.**

## Adequate, Relevant and Limited Data Processing

Donors, contacts, customers and partners of JVMUK will only be asked to provide information that is relevant for communication purposes. This may include:

- **Name.**
- **Postal address.**
- **Email address.**
- **Telephone number.**
- **Bank details for the purposes of direct donations.**

**Where additional information may be required, this will be obtained with the specific consent of the donor who will be informed as to why this information is required and the purpose for which it will be used.**

**There may be occasional instances where an individual's data must be shared with a third party due to an accident or incident involving statutory authorities. If it is in the best interests of the individual or of JVMUK, in instances where JVMUK has a substantiated concern, then consent does not have to be sought from the donor.**

## Accuracy of Data and Keeping Data up to Date

JVMUK has a responsibility to ensure donors' information is kept up to date. Donors, contacts, customers and partners will be asked to inform JVMUK of any of their personal information changes.

## Accountability and Governance

The JVMUK Board is responsible for ensuring that JVMUK remains compliant with data protection requirements and for providing evidence that it has done so. The JVMUK Board shall ensure those responsible for data protection are competent.

## Secure Processing

The Board of JVMUK have a responsibility to ensure that data is both securely held and processed. This will include:

- Restricting access of data to those who communicate with donors, contacts, customers and partners on a regular basis.
- Using strong password protection on laptops and PCs that contain or access personal information.
- Using strong password protection or secure cloud systems when sharing data between data managers and the JVMUK Board.
- Ensuring firewall security is installed on all devices with access to data.

## Subject Access Request

JVMUK donors, contacts, customers and partners are entitled to request access to the information that is held by JVMUK. The request must be received in the form of a written request to JVMUK at: Admail 4224

London, W2 4UN Receipt of the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. JVMUK will then provide a written response detailing all information held on the individual. A record shall be kept of the date of the request and the date of the response.

## Data Breach Notification

Should a breach occur, action shall be taken to minimise any damage. All JVMUK Board members will be made aware of the breach and how it occurred. The Board shall then seek to rectify the cause of the breach as soon as possible to prevent any future breaches and, where necessary, notify the Information Commissioner's Office (a non-departmental public body which reports directly to Parliament). The Board shall also contact the relevant individuals to inform them of the data breach and actions taken to resolve it.

If a JVMUK donor, contact, customer or partner contacts JVMUK to say they feel that there has been a breach, the Board will ask the individual to provide written details of these concerns. The matter will then be fully investigated by JVMUK Board members who are not in any way implicated in the breach. Should the Board need support, or if the breach is serious, they will notify the Information Commissioner's Office. Individuals concerned should also be informed that they can report their concerns to the Information Commissioner's Office if they don't feel satisfied with the response from JVMUK. Investigation records will be kept and all those involved will be notified of the outcome.

***NOTE: Jewish Voice Ministries International reserves the right to use discretion to interpret and administer this policy in order to consider mitigating circumstances, operational needs and other unforeseen factors.***