

# Privacy Policy

At Jewish Student Chaplaincy Scotland we're committed to protecting any personal information you share with us, or that we receive from other organisations, and keeping it safe.

Please read the following notice to understand how Jewish Student Chaplaincy Scotland will treat your personal information. We are subject to the legal jurisdiction of Scotland and any data protection legislation that applies in that jurisdiction. For the purpose of the Data Protection Act 1998 (DPA) and the General Data Protection Regulation 2016(GDPR), the Data Controller is Jewish Student Chaplaincy Scotland.

## Who are we?

Jewish Student Chaplaincy Scotland (JSCS) is an independent charity registered in Scotland with the Office of Scottish Charity Regulator [registration number SC005999] since 1973.

## Why do we need your data?

At JSCS, we administer a Chaplaincy service to Jewish students at universities and colleges in Scotland and raise funds to support the activities of the Jewish student Chaplains in order to make sure that Jewish students will always have a way to express their Jewish identity across campuses in Scotland as well as receive pastoral care. To do this effectively, we work with a range of individuals, groups, and businesses. We use the knowledge we have about people – personal data - only to further the work of JSCS now and in the future. We understand our responsibilities as stewards of this data and will protect your privacy. This notice describes how we do this.

## Whose information do we collect?

We hold data on individuals who have given financial or other support to Jewish Student Chaplaincy Scotland, those who might do, and those, normally students, who apply to Jewish Student Chaplaincy Scotland for funds, whether on behalf of an organisation or personally.

## How do we collect information from you?

Most of the information we hold about you has been provided directly to us by you. Examples include when you enquire about our activities; make a donation; set up a fund; apply for a job or volunteer role, or attend events organised by us. We may also receive information about you from someone else. Examples include where existing supporters feel you may be interested in supporting our work and suggest your name to us or data collected via a service provider like PayPal or KindLink. In some cases, we may collect data from publicly available sources. Examples include information gathered from news articles or online media, including social media. We may also use publicly available directories and similar information such as the Royal Mail's National Change of Address database and Companies House.

## What type of information is collected and why?

The data we collect depends on the nature of our relationship with you. At any time you can ask us to see what information we hold about you, ask us to correct or update information, or ask us to delete the information we hold.

## **For donors**

We need to ensure your contact details are up to date. This will help us plan our development activities and ensure appropriate due diligence is carried out. To safeguard the assets and reputation of Jewish Student Chaplaincy Scotland, we may keep the following information about you:

- Your name
- Contact details including your address, telephone number(s) and email address
- Information about how you like to be contacted
- Information about the organisations you may have links to
- If you are a current UK tax-payer (for Gift Aid purposes)

This information will be stored in a way that enables us to keep track of your donations, process gift aid declarations, and monitor fund balances where applicable. It helps us to ensure any money you donate is spent in accordance with your wishes.

## **For grantees and their representatives**

In order to solicit and process applications for funding from Jewish Student Chaplaincy Scotland, we collect personal information from people representing the groups we support, who apply for funds or about individuals who apply for funds. This will include:-

- Your name
- Contact details including your address, telephone number(s) and email address
- Information about how you like to be contacted
- Information about your connection to the beneficiary or applicant organisation
- Bank account details

## **How long do you keep my data for?**

We will keep data for as long as is needed to complete the task for which it was collected. Relationships between donors, fund recipients and Jewish Student Chaplaincy Scotland are often long term. So we expect to keep your data for as long as the relationship exists, or until we no longer need it.

## **Is my data securely stored?**

We primarily store personal data electronically. Any paper records we have will be scanned and stored electronically, and the paper copies destroyed wherever possible. Electronic records are all held in secure servers, with strong password protection.

The primary electronic systems we use to process your personal information include:

- Emails, documents, and spreadsheets are held on cloud-based servers;
- Non-sensitive details, such as your email address, when transmitted over the internet, can't be guaranteed to be 100% secure. Whilst we take all possible means to protect your personal information, we cannot guarantee the security of any information you transmit electronically to us, and you do so at your own risk.

## **Who has access to my data?**

The Trustees and staff members will be granted secure access to your personal information where it's necessary for them to carry out their duties on behalf of JSCS. All staff are given

training in data protection and are required to comply with our internal data protection policy.

### **Will my personal data be shared with third parties?**

We will only ever share your personal information with third parties where it helps us to carry out our business functions and charitable activities, or where we have a legal obligation to do so. We will never sell or trade your information with third parties.

Third parties we may share your data with include:

- Our software suppliers, for example in processing communications sent to you
- Our bankers (for payments to fund recipients who are individuals)
- UK Community Foundations and Trusts, for grant monitoring purposes
- HMRC on Gift Aided donations since we have a legal obligation to provide this information
- We will share information on fund applicants with fund panel members and donors. We will, however, redact personal information to the greatest extent possible. We will also publish data on fund recipients for groups/organisations (amounts/name of group/purpose), but we anonymise details for any individual recipients.
- We will use external assessors to assess some of the applications we receive. We will, however, redact personal information to the greatest extent possible
- We may pass data to other organisations, known as Data Processors, to provide specific services to us. An example would be providing data to a mailing house to send a newsletter. A contract is always in place with a Data Processor, and they are not allowed to do anything with your data other than that which we've requested.
- We may share basic information on the attendees at an event or meeting with the host or other person who is a supporter of Jewish Student Chaplaincy Scotland
- When donating you are using our chosen secure online facility, your donation is processed by a third party who specialise in the secure online capture and processing credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

Some of our suppliers and service providers may run their operations outside of the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside of the EEA.

### **Our responsibilities**

The law requires us to tell you the basis on which we process your data. Some activities may require your consent. If the law requires your consent to process data in a certain way, then we will obtain it before carrying out that activity.

Other activities carried out to fulfil a contract or agreement. Examples include holding funds or organising an event. Each requires us to know who you are and to process your information in order to do what you've asked us to do. In these instances, we will process your data based on that contract.

If personal data is required to be collected and processed to comply with the law, then consent is not required. This is the case for some data related to taxation. In all other cases, the law allows us to process your data if it is in our legitimate interest to do so, but only so long as we need to and your "interests or your fundamental rights and freedoms are not overridden". Practically speaking this means we carry out an exercise to check that we will

not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way described in this privacy notice.

## Your Rights

The law requires us to tell you that you have a variety of rights about the way we process your data. These are as follows:

- Where our use of your data requires consent, you may withdraw this consent at any time.
- Where we rely on our legitimate interest to process data, you may ask us to stop doing so.
- You may request a copy of the data we hold about you.
- You may change or stop how we communicate with you or process data about you, and if it's not required for the purpose you provided it, then we will do so. Activities like processing Gift Aid donations, or managing Fund Agreements, may mean we can't entirely stop processing your data. However, we will always endeavour to comply with such a request.

If you are not satisfied with the way we have processed your data then you may complain to the Office of the Information Commissioner. <https://ico.org.uk/>

## Communications

We may use the personal information we hold to communicate with our clients, donors and supporters. When we do so, we will be processing your data in line with one of the legal bases permitted by current data protection legislation. In most cases, this will be because we have a legitimate business interest in contacting you as a donor or supporter. In each case, you have given us explicit consent to do so. You can withdraw consent at any time by following the unsubscribe link in our emails, or by contacting us directly.

## Cookies

Cookies are small text files that are placed on your computer by websites that you visit. These files store information on how you behave when using the website and this information is shared with the website owners. When visiting our website, you will be asked to consent to us saving this information from your visit.

We only ever collect information that helps us to understand and improve the way it works. We use this understanding to help visitors get the most out of their visit to our site.

You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if the cookies are disabled. You're also able to manage and delete cookies by visiting the setting within your chosen web browser.

## How we use cookies?

**WIX** – Wix is our website provider and uses cookies to collect information about how visitors use our site. This information is stored on servers across the world.

Wix uses cookies for important reasons, such as:

- To provide a great experience for site visitors.

- To monitor and analyse the performance, operation and effectiveness of Wix's platform.
- To ensure our platform is secure and safe to use.

The following links explain how to access cookie settings in various browsers:

- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Google Chrome](#)
- [Cookie settings in Safari \(OS X\)](#)
- [Cookie settings in Safari \(iOS\)](#)
- [Cookie settings in Android](#)

If you have any questions about this privacy policy, about how we process your data, or if you wish to change the way we use your data, including how we communicate with you, then please contact us.

## Contact information

### Contact name

Dr Mia Spiro, Chair

info@jscs.scot