

THE NLPS TRUST FOR PROGRESSIVE JUDAISM

PRIVACY POLICY

Your privacy is important to the NLPS Trust (the **Trust**). We are committed to safeguarding the privacy of our website's visitors and all individuals who supply personal information to the NLPS Trust in connection with its work. This privacy statement sets out how we will treat the personal data that you make available to us.

This website is not intended for children and the Trust does not knowingly collect data relating to children.

PERSONAL DATA COLLECTION

The Trust may collect and store and use the following kinds of personal information:

1. **Identity Data** including names or similar identifiers, title, date of birth and gender;
2. **Contact Data** including addresses, email addresses and telephone numbers;
3. **Financial Data** including bank account and payment card details;
4. **Technical Data** including internet protocol (IP) addresses, browser types and versions, time zone setting and location, browser plug-in types and versions, operating systems and platforms, device ID and other technology on the devices you use to access this website;
5. **Usage Data** including information about how you interact with and use our website and application forms; and
6. **[Marketing and communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.]

The Trust may use different methods to collect data from and about you, including through your interactions with the us:

1. information that you provide to the Trust for the purpose of enquiring about or applying for a grant;
2. information that you provide to the Trust for the purpose of reporting on grants or providing case studies;
3. information that you provide for the purpose of applying for a trustee role; and
4. any other information that you choose to send to the Trust.

Commented [SW1]: I suppose the Trust might send marketing information (e.g. inviting applications or donations) but would we ever allow third parties to send marketing? What does our web administrator do in this regard?

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USING PERSONAL DATA

Personal information collected by the Trust or submitted to it by you directly via email or post, over the telephone, in person or by any other means will be used for the purposes specified in this privacy statement. We may process your personal data for the reasons detailed below:

Grant applicants: Personal information provided to us directly via email or post for the purpose of submitting a grant application will be used as appropriate during our review and assessment of your application. By providing us with your information, including personal data, signifying consent on an application form, you will be providing your explicit consent to the collection and retention of the information that you provided on our database. We may use your data to send you email notifications related to a grant application and to send you general communications about the Trust.

Information provided by grant applicants for the purpose of reporting or case studies will not be shared outside the Trust without your explicit and informed consent.

Grant enquiries: If you have not applied to us before and you contact us by telephone, email or post to make an enquiry, the information that you provide will be held as necessary for our legitimate interests in dealing with your enquiry and analysis of enquiries received.

Trustees: Personal data for trustees held by the Trust will be retained for as long as necessary to facilitate a high standard of due diligence for the Trust. Six (6) years after a trustee has ceased to hold the role of trustee of the Trust, this data will be securely destroyed.

Trustee role applicants: Personal data submitted for the purpose of applying for a trustee role at the Trust will be retained for as long as we need to use it for the purpose of considering you for a vacancy. If we determine that we cannot offer you the role, we will retain your details on file for up to 6 months before securely destroying the data.

Website users:

The Trust's website is hosted by Weebly. All cookies placed by Weebly for visitors of this website are strictly necessary for the operation of the service by Weebly. These cookies are only used internally by Weebly. Cookies are small text files that are placed on your computer, mobile phone or other device when you browse websites.

These cookies are not accessible to the Trust and are used to generate aggregate usage and statistical data. This anonymous data is available to the Trust detailing the number of unique visits, pageviews, top pages, search terms and referring websites. It is not possible to associate this information with any individual in any way.

Commented [SW2]: Deleted for accuracy and to avoid confusion. Weebly and the website might seem the same to most people.

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If you do not consent to the foregoing use of cookies please disable cookies in your browser and clear cookies after visiting this website. Please note that disabling cookies may render this website difficult or impossible to use. By continuing to use this website, you consent to the use of cookies in accordance with the above.

Other: Any other personal information knowingly provided to the Trust, including but not limited to the purpose of applying for a grant, will only be used for the purpose for which it was given. The data will not be kept for longer than necessary and will be destroyed securely. Your personal information will not be shared with third parties unless it is required by law, for example, for the detection or prevention of crime.

JUSTIFICATION

This information is processed according to Article 6 of the General Data Protection Regulation for the following reasons:

1. as necessary for the performance of tasks carried out in the public interest, in this case the disbursement of funds to a variety of charitable organisations who meet Trust's charitable objects;
2. as necessary in the pursuit of the legitimate interests of the Trust, in this case, to acquire the information necessary to process grant applications; and
3. for compliance with legal obligations including the provision of full and accurate information to the Charity Commission.

RETENTION PERIOD

The NLPS Trust reserves the right to hold data related to grant applications for archive purposes and in order to facilitate a high standard of due diligence which will enable the charity to continue to fulfil its charitable objects. The Trust reserves the right to hold data related to unsuccessful trustee role applications for no longer than 6 months, before all data is securely destroyed.

PERSONAL DATA SECURITY

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

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The NLPS Trust will store all the personal data you provide on its secure cloud based services including its Google account and an additional encrypted backup on a hard drive. This information is protected using both password management tools, data encryption and two-factor authentication where possible.

DISCLOSURES

We may disclose information about you to any of our trustees or auditor insofar as reasonably necessary for the purposes as set out in this privacy statement.

In addition, we may disclose your personal information:

1. to the extent that we are required to do so by law;
2. in connection with any legal proceedings or prospective legal proceedings;
3. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
and
4. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy statement, we will not provide your information to third parties.

CROSS-BORDER DATA TRANSFERS

Information that the NLPS Trust collects may be stored and processed in, and transferred between, any of the countries within and outside the EU in accordance with this privacy statement. In addition, personal information that you submit for publication on the website will be published on the internet and may be available around the world.

YOUR RIGHTS

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to the supply of appropriate evidence of your identity.

In some circumstances you may also have the right to:

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- Request that we erase any personal data held about you;
- Restrict our processing of your personal data (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
- Data portability (i.e. to request the transfer of personal data to a third party); and
- Object to our processing of your personal data.

Requests in respect of the above should be made in writing to the NLPS Trust at admin@nlpstrust.org.uk. Please contact us at the same email address if you have any reason to believe that information we hold about you is inaccurate. We will aim to respond to your request within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (for example if, in the circumstances, the right does not apply to you).

You will not generally have to pay a fee to exercise any of your rights described above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances. We may also charge a reasonable fee if you request further copies of the data following a request. The fee will be based on the administrative costs of providing further copies.

If you have concerns about how we use your data, you have the right to complain to the Information Commissioner's Office (**ICO**). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.

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.

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PRIVACY STATEMENT UPDATE

We may update this privacy statement from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

CONTACT US

If you have any questions about this privacy statement or our treatment of your personal information, please write to us by email to admin@nlpstrust.org.uk.