

# TBI Privacy Policy



Updated 27/9/2018

## 1. **Introduction**

- a. At Temple Beth Israel we are committed to protecting your personal information and data. We take reasonable care to ensure we use your personal information and data in accordance with all applicable laws, notably the Privacy Act (1988) and Australian Privacy Principles.
- b. We believe in being transparent regarding what we do with your information and data and will never utilise or process it in a way that we believe you would not reasonably expect. This policy informs you of how we will process your personal information and data.
- c. The person responsible for data control on behalf of Temple Beth Israel (76-82 Alma Road, St Kilda VIC 3182) is the Membership and Events Coordinator.

## 2. **The information we collect and how we use it**

- a. We collect information and data about you directly from you and your family. This is primarily done via application forms (for example membership application forms, event booking forms and education booking forms) and emails.
- b. The legal basis for processing your personal information and data is that we have a legitimate interest in doing so. The legitimate interest being pursued is that as a Synagogue and communal organisation we need to hold a certain amount of personal information and data relating to our members and visitors so that we can communicate with them and manage their membership.
- c. In using and attending our events or services you consent to the collection and use of your personal information and data as set out in this Privacy Policy.
- d. On occasion, we may add information about you received from another visitor/member of the Synagogue, a family member, or a third party where it is relevant and we have confidence it is accurate. This typically happens when someone else is registering another guest for an event, or using a third-party website and you have given your consent to them. We may combine information that we already have about you with information available publicly from external sources in order to gain a better understanding of you. This may include social media sites.
- e. If you provide information for another person, you need to first ensure they agree for you to do so, and be clear about what information you will provide. You must inform them of where they can find our Privacy Policy.

- f. Personal data and information that we collect may include:
  - i. Personal information including name, gender, contact details, date of birth, family members, next of kin details, employment details, education details, car registration details, events attended, Working with Children Check information.
  - ii. Some medical information, if relevant, including allergies and learning difficulties.
  - iii. Religious information including Hebrew name, yahrzeit dates, b'nei mitzvah details, marriage details, conversion details, family member details.
  - iv. Membership details including date of joining and rate of membership.
  - v. Financial information including bank details, monies paid/donated, direct debit details, and bequest commitments.
  - vi. Visitor security form information including current and previous home addresses, ID documents and job information.
  
- g. Temple Beth Israel does not use any prohibited identifiers (for example tax file or health care card numbers).
  
- h. We use the information to provide you with information about products and services in keeping with our operation as a Synagogue and Cultural Centre. This includes:
  - i. Information regarding our religious services.
  - ii. Information regarding upcoming events, both run by us and by third parties that we deem may be of interest.
  - iii. Religious information in line with our mission.
  - iv. To ask you to take part in community activities, e.g. volunteering at events, community dinners, film nights and security rosters.
  - v. To meet pastoral and welfare needs.
  - vi. For fundraising purposes and/or to collect donations.
  - vii. For general promotional and marketing materials and activities.
  - viii. For market research purposes and to monitor and improve our service to you.
  - ix. To provide services and opportunities fitting for a Synagogue and Cultural Centre.
  - x. As otherwise permitted or required by any applicable law or regulation.
  
- j. We may contact you by email, letter, via social media, phone, text message or WhatsApp.
  
- k. If there are any changes to your personal information and data, or if you become aware that we have inaccurate personal information and data relating to you, please contact us immediately so that we can correct the information. We cannot be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information and data that you have provided us.
  
- l. We may occasionally use profiling techniques in order to target our communications effectively – e.g. To advertise information to someone of a particular age group, or within a certain location, or to assess the level of donation you may be able to give.

- m. Staff or volunteers who have responsibility for an event or activity may have access to your data and may contact you. They will only use your data for the limited purpose of their duties.
- n. With the exception of select roof body organisations including Progressive Judaism Victoria (PJV), Union for Progressive Judaism (UPJ) and the Australian Reform Zionist Association (ARZA), we will never give, sell, share or trade your information to a third party unless we have your explicit consent to do so or are required to do so by a court of competent jurisdiction or an official regulator if they are authorised to act on our behalf.
- o. We typically hold most information indefinitely, unless requested otherwise. This includes information of over 18-year olds that did not join Temple Beth Israel in their own right prior to reaching the age of 18, unless requested otherwise. This is so we can continue to offer you services that may be of interest to you and so we can help you in the future if you choose to re-join, or request specific information from us.
- p. In order to help us communicate with you and to store data cost-effectively we use various third-party solutions, including ShulCloud and Cong Space (as our primary databases), Google Drive, Dropbox and Microsoft OneDrive (as cloud storage and file sharing) and Xero (accounting software). As such, your information may be transferred and stored in countries outside Australia, including some that may not have the same level of protection of personal information and data as are enjoyed within Australia.

### **3. Internet and CCTV**

- a. No data transmission over the internet is 100% secure. As a result, whilst we try to protect your personal information, we cannot guarantee the security of any information you transmit to us.
- b. Our website uses cookies (small software programmes that sit on your browser to improve the speed with which information can appear on your screen). This may provide us with information as to how users use our online services. If you do not wish to receive cookies, you can block them on your browser.
- c. When you receive emails from us, such emails may contain technologies to track, for market research purposes, whether you opened those emails and whether you accessed internet links contained within those emails.
- d. Our website may include links to other sites, not owned or managed by us. We cannot be held responsible for the privacy of information collected by these websites.
- e. We do not place personal information and data on our website or materials other than names of members.

- f. We may upload photographs of our events and adult members to our website and social media profiles. We will make every effort to obtain the permission of a child's parent or guardian before taking an image of a child and ensure that the parent/ guardian knows the way the image will be used. Where an image of a child is used, the image will not display identifying personal information unless permission is received from a parent/ guardian. These images will be removed upon request.
- g. We do not accept responsibility for the protection of any data publicly included on our website and on social media sites
- h. Temple Beth Israel has a CCTV system which records activity on our grounds and in the Synagogue building. The purpose of the CCTV is for security and to help with accidents and crime prevention. The CCTV is primarily accessed by the security, caretaking, management and reception teams to aid their ability to carry out their daily tasks. The CCTV archive footage is overwritten after forty days. The Police, Community Security Group (CSG) and other recognised security organisations may access our CCTV archives.

#### 4. **Your rights**

- a. You have a number of rights relating to your information, including:
  - a. to know why your personal information and data is collected.
  - b. to know how your information is used and whom it will be disclosed.
  - c. to have access to view your personal information.
  - d. to request correction and rectification of your personal information and data.
  - e. asking us to share your data with another party.
  - f. asking us to delete some or all of your information.
  - g. withdrawing consent regarding us holding and processing your data.
  - h. restricting or stopping us from using any of the personal information and data which we hold on you, including by withdrawing any consent you have previously given to the processing of such data.
  - i. to make a complaint if you consider your information and data has been mishandled
- b. Please contact the Membership and Events Coordinator if you wish to make any requests. Such information will generally be provided within one month of the request.
- c. Temple Beth Israel has the right to make a reasonable charge to you for processing any unfounded, repeated, duplicate or excessive requests and to ask you to prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.
- d. Your provision of personal information and data to us is not a contractual or legal requirement. However, in certain circumstances, without the data we may be unable to fulfil the requirements you ask us to do, for example relating to funerals, marriage, conversion or other life cycle events.

- e. If you have any questions, or for more information regarding how your data is used, you can contact the Membership and Events Coordinator the office on 03 9510 1488 or [info@tbi.org.au](mailto:info@tbi.org.au)

## 5. **Complaints**

- a. When we receive a complaint in relation to this policy, we will make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
- b. We will only use the personal information and data we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.
- c. We will keep personal information contained in complaint files.
- d. You also have the right to complain to the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au) about the manner in which we process your personal information and data.

## 6. **Updating this Privacy Policy**

- a. We may change or update parts of this Privacy Policy in order to maintain our compliance with application law and regulation or following an update to internal practices. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.
- b. You can see the when this Privacy Policy was last updated at the start of this document.
- c. Our latest Privacy Policy will be posted on our website – [www.tbi.org.au](http://www.tbi.org.au)

## 7. **Useful links.**

Australian Privacy Principles

<https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>

Privacy Act (1988)

<https://www.legislation.gov.au/Details/C2018C00034>

EU General Data Protection Regulation

<https://bit.ly/2PxEotT>

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