

# Privacy

## **Your privacy is important to us.**

Phone and Learn are committed to protecting and respecting your privacy.

This privacy policy sets out the basis upon which any personal data we collect from you, or that you provide to us, will be processed by us.

The data Controller is Phone and Learn of 4a Helenslea Avenue, London, NW11 8ND.

Phone and Learn is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement.

Phone and Learn may change this policy from time to time by updating this page. You should check this page frequently to ensure that you are happy with any changes.

## **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 held 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 statement. You should exercise caution and review the privacy statement applicable to the website in question.

## **How we collect your personal data**

We obtain personal data about you, for example, when:

- you contact us through our website or by email, telephone, post (for example when you have a query about our services); or
- from third parties and/or publicly available resources

## **The kind of information we hold about you**

The information we hold about you include the following:

- your personal details (such as your name, address, date of birth)
- details of your Jewish education and Jewish observance
- details of any learning partnerships you have had through us
- our correspondence and communications with you;
- information from research, surveys and marketing activities;

## **How we use personal data we hold about you**

We process your personal data for purposes necessary for your learning partnership and to comply with our legal obligations.

We process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, development of the organisation, statistical and management purposes.

We process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### **Situations in which we will use your personal data**

We use your personal data in order to:

- maintain accurate internal records of our engagement with you and your learning partner, event participants and supporters, volunteers, staff and others.
- raise funds and awareness about our work through campaigns and events.
- to send you information about Phone and Learn and our activities which we think may be of interest to you.
- Data may be processed and viewed by the relevant staff, trustees and volunteers in the course of Phone and Learn's activities (all of whom work in accordance with this privacy policy).

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

### **Data retention**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our organisation and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;

- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

### **Data sharing**

#### **Why might you share my personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

#### **Which third-party service providers process my personal data?**

“Third parties” includes third-party service providers and sub-contractors. The following activities are carried out by third-party service providers: IT and cloud services, administration services, marketing services and fundraising services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

#### **Transferring personal data outside the European Economic Area (EEA)**

We transfer your personal data abroad if required for the Permitted Purposes as described above. This includes countries which do not provide the same level of protection as the laws of the EEA. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulations (GDPR). You may contact us anytime using the contact details below if you would like further information on such safeguards.

We will also require our agents, consultants and sub-contractors and others who are outside the EEA and to whom we transfer your personal data to ensure a similar level of data protection.

When doing so we will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of your personal data.

## **Data Security**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact [privacy@phoneandlearn.org](mailto:privacy@phoneandlearn.org).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We will request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact [privacy@phoneandlearn.org](mailto:privacy@phoneandlearn.org).

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Changes to this notice**

Any changes we make to our privacy notice in the future will be updated on our website: [www.phoneandlearn.org](http://www.phoneandlearn.org).

### **Contact us**

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our data protection point of contact [privacy@phoneandlearn.org](mailto:privacy@phoneandlearn.org).

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>