



## **Beth Tikvah Synagogue**

### **Privacy Policy**

Beth Tikvah Synagogue recognizes the importance of maintaining the privacy of individuals and the confidentiality of personal information. We take seriously our obligation to keep personal information confidential and we protect it with physical, technological, and administrative safeguards. In order to instill confidence in our members and potential members that the personal information they entrust to us is safe and protected, we have developed this Privacy Policy.

Personal information means identifying information about an individual in oral or recorded form. Personal information does not include the name, title/position/occupation, work address, work telephone number, work fax number, or work email address of an individual.

#### **Why Does Beth Tikvah Synagogue Collect Personal Information From You?**

Beth Tikvah Synagogue collects personal information so that we can provide our members and our community with a range of services and activities, which includes:

- Yahrzeit reminders and aliyot;
- Newsletter (for example, Ma Nishma, Hakol), notices, mailings, and other communications with our members;
- Adult education, programs, and activities (for example, Lunch & Learn, Musica Beth Tikvah);
- Youth and young families programs and activities;

- General announcements, including life cycle events (for example, baby namings, britot milah, b'nai mitzvah, aufrufs, weddings), illness, and death (for example, funeral, burial, and Shiva arrangements, unveilings) of our members;
- Assignment to membership contribution category;
- Membership status determination;
- Membership fees/contribution collection;
- Membership privileges;
- Simḥa bookings and catering arrangements;
- Meetings of the Congregation such as Election Meetings, Annual General Meetings, Special General Meetings;
- Fundraising and donations;
- Programs and activities relating to affiliate or auxiliary groups and organizations, including Beth Tikvah Men's Club and Beth Tikvah Women; and
- Provides support for Shivas and Hesed by staff and volunteers.

Beth Tikvah Synagogue collects personal information:

- to generally communicate with our members, and
- to understand and assess the needs and requirements of our members and potential members and to offer services, programming, and events to meet those needs.

Membership in a religious community brings with it certain understandings, one of which is that certain information or news about members and their life cycle events will be shared with the community. We will continue to share this type of information, unless we are notified by a member(s) that this type of information is not to be shared with the community.

### **How Do We Collect Your Personal Information?**

We collect personal information only by lawful and fair means and not indiscriminately. We may collect personal information directly from you when you become a member of Beth Tikvah Synagogue, or during the term of your membership. We may on occasion obtain personal information about you from other sources, such as other family members or members of Beth Tikvah Synagogue.

## **Consent**

Beth Tikvah Synagogue will not collect, use, or disclose your personal information without your consent, except in certain extraordinary circumstances. Such extraordinary circumstances shall include without limitation, when legal, medical, or security reasons, make it impossible or impractical to obtain consent.

Consent for the collection, use, and/or disclosure of personal information may be obtained orally, electronically, or in writing, and may be expressly given or implied. We may also from time to time ask you to give your written consent to the use and disclosure of specific personal information. In determining how we obtain your consent, we will take into account the sensitivity of your personal information that we are collecting, using, and/or disclosing. We will collect, use, and disclose your personal information only in accordance with this Privacy Policy.

## **If You Do Not Consent**

The choice to provide us with personal information is always up to you. Upon request, we will explain to you the implications of refusing or withdrawing consent to the collection, use, and disclosure of your personal information, and will record and respect your choice, as long as it is in writing. However, your decision to withhold particular details may limit our ability to provide our services to you. This measure is necessary to protect the integrity of the services offered by Beth Tikvah Synagogue. Furthermore, any refusal or withdrawal of consent is always subject to any overriding legal requirements. In addition, the withdrawal of consent shall not have a retroactive effect. This means that you cannot withdraw consent for any collection, use, or disclosure of personal information that has already taken place.

## **Disclosure of Your Personal Information**

Under certain circumstances, Beth Tikvah Synagogue may disclose your personal information without your consent:

- when the law requires us to do so;
- where the services we are providing requires us to give your information to third parties (for example, to a funeral home, caterer, educator, or external clergy), in which case, your consent will be implied unless you tell us otherwise;
- where it is necessary to establish or collect membership fees or contributions, pledges;

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- when third party service providers (for example, fundraisers, accountants, computer back-up services, archival file storage), are used, we have contractual arrangements that ensures they have comparable levels of protection to which we maintain for personal information;
- where we engage in joint activities or programs with other organizations of a religious or communal nature;
- if we are involved in negotiations regarding a merger with another congregation; or
- if the information is already publicly known.

Where Beth Tikvah Synagogue may disclose your personal information without your consent, we will not disclose more personal information than is minimally required in the applicable circumstance.

We never make our membership list available to third parties in any form, except as set out in this Privacy Policy or unless we have your consent.

### **Is Your Personal Information Secure?**

Beth Tikvah Synagogue takes all reasonable precautions to ensure that your personal information is kept safe and protected from loss, theft, misuse, unauthorized access, modification, or disclosure. Among the steps taken to safeguard and protect your personal information, depending on its type and sensitivity, are:

- premises security;
- employees are subject to confidentiality requirements;
- restricted access to personal information;
- using technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;
- back-up of data on a daily basis;
- passwords; and
- when necessary or appropriate, by requiring third parties to sign confidentiality agreements.

As Beth Tikvah Synagogue is responsible for any personal information under its control, including any personal information that Beth Tikvah Synagogue may transfer to a third party for processing, we will use contractual means to ensure the third party processing information on Beth Tikvah Synagogue's behalf will have a comparable level of protection to which we maintain for personal information.

### **Updating Your Personal Information**

Since we use your personal information to provide services to you, it is important that the information be accurate, complete, and up-to-date. If any of your personal information changes, or if you should become aware that the personal information which we have is incorrect, please inform us so that we can make the necessary changes.

### **Access to Your Personal Information**

You may request access to any of your personal information we hold. A summary of information is available on written request. More detailed requests that require archive, retrieval, or copying costs may be subject to reasonable reimbursement.

### **Can I Be Denied Access to My Personal Information?**

Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required by law or the rules of a formal dispute resolution process, such as a Bet Din;
- information relates to legal proceedings involving you;
- granting you access would have an unreasonable impact on other people's privacy;
- to protect Beth Tikvah Synagogue's rights and property; or
- the request is frivolous or vexatious.

If we deny your request to access your personal information, or deny your request to correct your personal information, we will provide you with a written explanation.

## **How Long Do We Keep Your Personal Information?**

We retain your personal information for as long as you are a member and afterwards for as long as is reasonably necessary for us to complete our dealings with you, or as may be required by law, or for purposes of compliance with our religious obligations. Synagogue records are often a valuable source of information which may be required for halachic or genealogical purposes. We may retain selected pieces of personal information indefinitely for those purposes, or to contact you to inform you of important news or events.

## **Website**

Our website ([www.bethtikvahtoronto.org](http://www.bethtikvahtoronto.org)) contains links to other sites which are not governed by this Privacy Policy. While no specific personal information is retained with respect to any visitor to our website, we may monitor traffic patterns, site usage, and related site information to optimize our web service. In the continuing development of our website, we may provide aggregated information to third parties, but these statistics do not contain any identifiable personal information.

## **Openness**

Beth Tikvah Synagogue is committed to ensuring that information about our Privacy Policy is available to you. A copy of our Privacy Policy is available on request by contacting the office. Our Privacy Policy is also posted on our website.

## **Communicating with Us**

Email is not a secure method of communication and you should be aware of this when contacting us or sending us your personal information.

## **Photographs**

Beth Tikvah Synagogue will ask for permission to photograph our members and their children. Beth Tikvah Synagogue will only reproduce, use, exhibit, post, and display these photographs, on the website [www.bethtikvahtoronto.org](http://www.bethtikvahtoronto.org) and in the newsletters Ma Nishma and Hakol, with permission. Beth Tikvah Synagogue will only use the names of our members in conjunction with

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these photographs, with permission. Beth Tikvah Synagogue will not use or publish the names of our members' children in conjunction with these photographs.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of July 12, 2018. Since Beth Tikvah Synagogue regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time. Please refer to our website or contact the office for revisions to this Privacy Policy.

### **Accountability and Requests for Access**

Beth Tikvah Synagogue has appointed a Privacy Officer to ensure that we comply with our obligations under this Privacy Policy.

If you have any questions, wish to access/correct your personal information, or to make a complaint, please contact our Privacy Officer, Doris Alter, at:

Privacy Officer

Beth Tikvah Synagogue

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This Privacy Policy was amended by the Board of Governors on March 26, 2019, July 23, 2019.