



Community Security Trust **PRIVACY NOTICE**

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Registered charity in England and Wales (1042391) and Scotland (SC043612).

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1. Introduction

We, meaning Community Security Trust (“CST”), a registered charity in England and Wales (1042391) and Scotland (SC043612), are committed to respecting your privacy and complying with applicable data protection and privacy laws. This notice outlines how we collect and use your information.

This privacy notice will inform you as to how we look after your personal data when you visit our website, and tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2. Controller

CST is the data controller and is responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

3. The data we process about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may also collect information we observe about you, for example via cookies when you visit our website, or CCTV footage when you visit Jewish places of worship, schools and the general Jewish community. We may also collect information about you from the Police.

Below we list some of the most common categories of personal information we may collect about you:

- Your contact details (including name, date of birth, title, address, telephone numbers and email addresses);
- Financial information from any donors; this will include your payment details including your bank account details;
- Your gender, university history, work experience, and referee details when applying to be a CST volunteer security officer;
- Any personal information you choose to give us when contacting CST or when you complete any surveys, donation process and/or provide us with your views and opinions;
- Sensitive personal information relating to health, criminal convictions or offences, race or ethnicity, for reporting incidents and/or to provide you with the necessary support when attending CST sites and/or events;
- Audio, video recordings, live stream footage and/or videography or other image(s) in connection with CST's legitimate interests;
- Other operational personal data created, obtained or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, logs of visitors, and logs of incidents reported.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in incident report forms, volunteer applications or when making a donation, or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookies policy below for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - The Police or other community surveillance operators;
 - Financial and transaction data from providers of technical, payment and delivery services.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to effectively respond to and deal with your query in the event that you contact us.
- Process your volunteer application form in the event you have applied for a volunteer security officer vacancy.
- Process and deliver your donation.
- Responding to and processing any incident report that you make.
- Prevent and/or detect crime.
- Monitor the safety of our volunteers, staff and contractors.
- Facilitate your access to any of our on-site facilities.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

- Any other processing for which you have given your consent, for example receiving marketing information or surveys.

Your relationship with us will determine why we collect particular information about you. We may be required by law to collect certain information; require it in order to perform a contract; or use it for our legitimate business interests where these do not override your rights or interests.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. Who do we share your personal data with?

Your information will be processed by employees of CST in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

- Contractors working on our behalf or in partnership with CST;
- Volunteer staff, including camera operators licensed under the SIA scheme, on site in the Jewish community or within CST headquarters;
- The Police, law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, and the apprehension or prosecution of offenders;
- Third-party service providers who perform functions on our behalf under contract, and who support our systems, operations and processes;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Consent

Where we need your consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

8. How long will we keep your personal data

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, financial and statutory reporting requirements mean we must keep certain records for a period of 8 years.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your rights

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest).
- The right to object to the processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your

data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.

- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request. We may also charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

To exercise your rights please write to:

PO Box 35501, London NW4 2FZ

Or email compliance@cst.org.uk

10. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) but our website is accessible from outside of the UK/European Economic Area.

11. Data security

We have put in place 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, volunteers, 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

13. Contact details and complaints procedure

Data Protection Officer:

Email address: compliance@cst.org.uk

Postal address: PO Box 35501, London
NW4 2FZ

At CST we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing appropriate measures to keep your information secure.

If you are not satisfied with the information provided in this notice, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire
SK9 5AF

Switchboard: 01625 545 700

Data Protection Help Line: 01625 545 745

We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

14. Use of cookies

WHAT IS A COOKIE?

Cookies are small text files that are stored by your browser onto your computer or mobile device. They are widely used in order to make websites work or work in a better, more efficient way. They can do this because websites can read and write these files, enabling them to recognise you and remember important information that will make your use of a website more convenient (e.g. by remembering your user preferences).

Most web browsers automatically accept cookies, but if you do not want information collected this way, there is a simple procedure in most browsers that allows you to deny or accept the cookies feature.

We work with other third-party organisations to provide the services on our website. A third party is an organisation which is not hosted at the domain address in your browser when you visit our website. These third parties may also use cookies on our website and can also place cookies on your device without you visiting their website directly.

The two types of cookies we use are CFID & CFTOKEN to set a session instance for the user to deliver the site's content correctly.

OUR COOKIES POLICY

Our cookies don't store personal

information such as your name, address or payment details. They are a string of encrypted text which we decode, and then use to associate you with a specific account. Think of it like a special password that allows us to identify you without ever knowing your real name.

We think that cookies make life on the internet a lot easier, and they stop you having to remember every password, and they stop us having to ask you time and again for the same details.

MANAGING COOKIES

You can control which cookies you get and which you keep on your device. Unless you have adjusted your browser settings so that it will refuse our cookies, our system will issue cookies when you visit our website.

Many web browsers can be set up to ask for your prior consent before an individual cookie is set on your device. This will give you control over your cookies but naturally may interfere with your browsing experience, i.e. if you have to accept each cookie on our website (and on other websites you visit).

You may refuse to accept our cookies on your device at any time by activating the setting on your browser which allows you to refuse cookies.

Please note that by deleting cookies or disabling future cookies you may be

unable to access certain areas or features of our website, and it will mean that settings such as your stored username and password may have to be reset. If you adjust your cookie settings this will also affect the other websites you visit.

All of the major browsers offer tips and guidance for managing the cookies available on your browser.

 WEBSITE www.cst.org.uk

 FACEBOOK **Community Security Trust**

 TWITTER **@CST_UK**  YOUTUBE **CSTmedia**

 NATIONAL EMERGENCY NUMBER (24-hour) **0800 032 3263**
LONDON (Head Office) **020 8457 9999**
MANCHESTER (Northern Regional Office) **0161 792 6666**