



# PRIVACY NOTICE

Last Updated: 26th May 2018

The below privacy notice is in effect from 25th May 2018.

The The Khoja Shia Ithnaasheri Muslim Community of London (or “KSIMC of London”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our services and tell you about your privacy rights and how the law protects you.

## 1 IMPORTANT INFORMATION AND WHO WE ARE

### 1.1 PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how KSIMC of London collects and processes your personal data through forms, our website, and including any data you may provide through this website when you donate and/or use a product or service.

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.

### 1.2 CONTROLLER

KSIMC of London is the controller and responsible for your personal data (collectively referred to as “Jamaat”, “we”, “us” or “our” in this privacy notice). Its registered office is KSIMC of London Islamic Centre, Wood Lane, Stanmore, HA7 4LQ and its registered charity number is 288356. The Jamaat owns the information collected on the website or through paper forms.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### **1.3 CONTACT DETAILS**

Email address: [admin@hujjat.org](mailto:admin@hujjat.org) (Subject: "Data Privacy" or "GDPR").

Postal address: KSIMC of London Islamic Centre, Wood Lane, Stanmore, HA7 4LQ

### **1.4 CHANGES TO PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated in May 2018. This privacy policy may change from time to time so please check it periodically.

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not initially be able to respond to some of your requests (for example, a request for the transfer of your personal data) as we are still working towards getting our systems and processes ready for some of these 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.

### **1.5 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 notice of every website you visit.

## **2 THE DATA WE COLLECT 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 collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Family Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender of your immediate family, where they are included in your membership.
- **Contact Data** includes billing address, correspondence address, email address and telephone numbers, as well as the content of correspondence to and from you.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.
- **Request Data** includes data which would be collected on physical forms which are submitted to carry out services e.g. Venue Booking or Equipment Hire.
- **Volunteer Management Data** includes identity data, contact data as well as information on training, clearance checks, skills and similar information.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website

feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## 2.1 SENSITIVE DATA

By holding Identity Data and Family Data, we implicitly hold 'Special Category' data about you, as this includes details about your race or ethnicity or religious affiliation, which could be inferred through it being held by us. Additionally, some Jumaat Services would potentially hold information about your health (e.g. Medical Surgeries).

In addition to the above, some Jumaat services will hold information regarding children (e.g. Saturday Workshop) and about criminal convictions and offences through DBS Checks, (e.g. on volunteers working with children).

## 3 HOW IS YOUR DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data and Previous and current claims by filling in forms or by corresponding with us by our website, post, phone, email or otherwise. This includes personal data you provide when you:

1. Complete a form for membership, or any other service;
2. make a donation or payment;
3. subscribe to a mailing list;
4. request a Jumaat service (e.g. Enrol at Hujjat Saturday Workshop);
5. enter a competition or survey; or
6. give us feedback.

- **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, server logs and other similar technologies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

1. Technical Data from analytics providers such as Google based outside the EU.

2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Sage Pay based inside the EU.
3. Obtain references upon receipt of an application for membership, in line with the Constitution of the Jamaat, from other Jamaat Organisations which may or may not be based inside the EU.

## 4 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 perform the contract we are about to enter into or have entered into with you.
- 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.

Please refer to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications to you via email, post or text message.

You have the right to withdraw consent to marketing at any time by contacting us.

### 4.1 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Usage</li> </ul>	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to take pre-emptive steps to ensure legal and regulatory compliance)
<b>Admin Office</b>		
To process the request of services, donations or dues, including: <ol style="list-style-type: none"> <li>1. Manage payments, fees and charges</li> <li>2. Collect and recover money owed to us</li> </ol>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> </ul>	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ol style="list-style-type: none"> <li>1. Notifying you about changes to our terms or privacy policy</li> <li>2. Asking you to take a survey</li> <li>3. General member care, including communications</li> </ol>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Usage</li> </ul>	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation © Necessary for our legitimate interests (to keep our records updated)
Servicing of request forms, requests received through email, phone, website, in person, etc. These include: <ol style="list-style-type: none"> <li>1. Nikah Registration Form</li> <li>2. Hire of Centre Form</li> <li>3. Membership Form</li> </ol>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Financial</li> <li>• Request</li> </ul>	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Your consent, where relevant

<p>4. Divorce Certificate Form  5. Death Registration Form  6. Gift Aid Form  7. Funeral Form  8. Welfare Loan Form  9. Will Form</p>		
<p>Contacting members in order to arrange the renewal of their membership</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>	<p>(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to correspond with members to facilitate the continuation of membership)</p>
<p><b>Website and Events</b></p>		
<p>To facilitate requests on information on events, services, community news (e.g. news of death, wedding invitations, etc.) through an email distribution list</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<p>Necessary for our legitimate interests (to correspond with members regarding news and events hosted or supported by the Jamaat)</p>
<p>To inform the Jamaat membership and interested parties of the schedule and speakers or reciters at Jamaat events (e.g. Wafat or Wiladat programmes)</p>	<ul style="list-style-type: none"> <li>• Identity</li> </ul>	<p>Necessary for our legitimate interests (to inform members and interested parties of Jamaat Programmes)</p>
<p><b>Volunteers</b></p>		
<p>To management volunteers of the Jamaat for resourcing, training, safeguarding and other such concerns</p>	<ul style="list-style-type: none"> <li>• Identify</li> <li>• Contact</li> <li>• Volunteer</li> </ul>	<p>(a) Necessary to comply with a legal obligation (Safeguarding)  (b) Necessary for our legitimate interests (Volunteer training and awareness, and</p>

	Management	resourcing for Jamaat Programmes or events)
<p>Keeping the Jamaat membership and interested parties informed of active volunteers, their roles, and at times, contact information, including:</p> <ol style="list-style-type: none"> <li>1. Information on websites</li> <li>2. Information printed on the Jamaat Calendar</li> <li>3. Details provided to individuals through email, phone, in-person and written enquiries</li> </ol>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Volunteer Management</li> </ul>	Necessary for our legitimate interests (to ensure the on-going operation of the Jamaat and timely response to queries)

## 4.2 **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## 4.3 **OPTING OUT**

You can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service or other transaction.

## 4.4 **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

## 4.5 **CHANGE OF PURPOSE**

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5 **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above.

- External Third Parties as set out in the Glossary.

- Third Parties of whom we become Member Organisations, and where the use of the data is not against your interests and fundamental rights.
- External Third Parties who legitimately service request or application from members, e.g. Barclays Bank, under contract for the 'Hujjat Housing Scheme'.
- Third Parties with whom our interests are suitable aligned, and where the use of the data is not against your interests and fundamental rights.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

## 6 DATA STORAGE AND INTERNATIONAL TRANSFERS

We primarily store data internally, i.e. in the UK and on private infrastructure, however in the course of processing we may rely on tools and services which are hosted outside of the EU, for example Google Drive. Your data may therefore be held and processed outside the EU at any given time in order to enable lawful and legitimate processing.

## 7 DATA SECURITY

We have put in place measures to prevent your personal data from being accidentally lost or used in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, volunteers and other third parties who have a 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.

## 8 DATA RETENTION

### 8.1 HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

Our retention periods for personal data are based on business needs and legal requirements. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and any other permissible related purpose.

For example, we retain payment information to support our accounts and to

comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

## **9 YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **9.1 NO FEE USUALLY REQUIRED**

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **9.2 WHAT WE MAY NEED FROM YOU**

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.

### **9.3 TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month of confirming the identity, scope and validity of a request. Occasionally it may take us longer than this, for example, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10 GLOSSARY

### 10.1 LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### 10.2 Third parties

#### **External third parties**

- Service providers acting as processors in the United Kingdom who provide IT and system administration services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## 10.3 Your legal rights

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes or to opt out of inclusion in data aggregation. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (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.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine- readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.