

Shalva, The Israel Association for Care and Inclusion of Persons with Disabilities

Data Protection Policy

The privacy and security of your personal information is important to us at Shalva, The Israel Association for Care and Inclusion of Persons with Disabilities ("Shalva Israel") and we are committed to ensuring that your privacy is protected. Any personal data collected by us will only be processed in accordance with this privacy policy.

A. What does this Policy cover?

This privacy policy sets out how Shalva Israel processes personal data (that is, information by which an individual can be identified) collected by us in the course of our lawful activities, in accordance with the Data Protection laws. This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this. If you want to discuss any matter relating to how your data is used, please call us on 02-6519555, email us at main-office@shalva.org or write to us at Shalva 1 Shalva Road PO Box 34449 Jerusalem 9134302. We may be required in certain instances to ask that your request for information be submitted in writing.

References to the processing of information includes the collection, use, storage and protection of data. Shalva Israel, a charity registered in Israel with registration number 58-017-3987, is the 'data controller' within the meaning of the Data Protections laws for the purposes of this policy. This policy extends to those working for and on behalf of Shalva Israel and, to the extent set out below, anyone else processing data on our behalf from time to time.

B. Why do we process your data?

Organizations are permitted to process data if they have one or more legal bases for doing so. Shalva Israel processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- Shalva Israel has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract, agreement or ongoing arrangement for the provision of services which someone has entered into with Shalva Israel or because someone has asked for something to be done so they can enter into a contract, agreement or arrangement with us; and/or
- Shalva Israel has a legal obligation to process data.

If and to the extent that Shalva Israel is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which Shalva Israel is able to provide services to or interact with you in future.

We may change this policy from time to time and any such changes will be published online at www.shalva.org. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy is effective from 15 October 2018.

C. What personal data do we process?

We collect the data necessary for Shalva Israel to pursue its charitable objectives to provide therapy, education, and rehabilitative care to persons with disabilities as well as support for their families and, in that connection, raising funds to provide the necessary resources for the operations of the mentioned activities. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses
- Such other information as may be required to run activities and events, such as dietary requirements, medical information, photographs and information necessary to ensure that participants, including vulnerable persons, are looked after and safeguarded
- Records and preferences for and of staff, volunteers, donor and event and program participants including, where necessary, bank or payment details in order to process payments to or from such persons and information about their tax status for the collection of Gift Aid or the payment of remuneration
- Such other information as is relevant and necessary for Shalva Israel to carry out its activities, charitable purposes and legal obligations.

Such information may be collected when you provide it directly to us or submit it through Shalva Israel's website (www.shalva.org – see section G. Web Browsing, below), when subscribing for a service, registering for an event or activity, making a donation, contacting us for information or otherwise.

D. How do we use your data?

We process your personal data in order to promote the charity's activities and to run community initiatives and fundraising activities, and particular for the following purposes:

- For internal record keeping, fundraising management, invoicing, communications and administration
- To organize and run events and provide support and assistance to the participants
- To provide news and updates about Shalva Israel's activities, projects and campaigns and about specific fundraising projects where requested or appropriate for donors
- To let you know about such other matters as pertain directly or indirectly to Shalva Israel's work and activities as we believe may be of interest to you

- To manage and improve our operations and communications with supporters
- To comply with any legal obligations and to protect parties' interests in cases of dispute

If you or someone acting on your behalf provides information about another person, such as a child participating in an event, you warrant that you have the legal authority to share such data with us and have informed such person(s) that their data is being shared and about our privacy policy.

Data processed will be retained only for as long as is reasonable and permissible in law. Accordingly, the periods for which we retain data will vary depending on the purposes for which it was collected and relevant statutory or other requirements.

In addition to those circumstances mentioned above, we will only share data with trusted partners, such as Shalva Israel's associated "Friends" organizations (American Friends of Shalva, British Friends of Shalva, Canadian Friends of Shalva), and third parties to the extent and where necessary for us to engage in the activities referred to above (such for database and donor management, online platforms for secure data storage or for email updates), to process payments (including through online payments platforms) and only once we are satisfied that any such use of data will accord with our privacy policy. We will not sell your personal information and will not share it without your explicit consent, except as stated above.

E. Your rights in relation to your personal data

You, as the data subject, may request deletion of your data at any time in writing, subject to any overriding legal requirement for its retention, such as the need, where appropriate, to comply with the requirements of the State of Israel's Revenue and Customs or other regulatory authorities, or to prevent the commission of or assist in the investigation of an actual or suspected criminal offence. We may keep certain data on a 'suppression list' so we know, if requested, not to contact you or process your data in the future until further notice.

You may request details of personal information which we hold about you. Any such request must be submitted in writing and we reserve the right to seek verification of the identity of persons making such requests before we respond, which we must do within 30 days. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may impact or limit the way in which we are able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on us to retain data, and as stated above.

You are responsible for the accuracy of data you have provided to Shalva Israel. If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

In the unlikely event that there is any kind of a breach of our duties and obligations under this policy or the Data Protections laws, we will take immediate steps to isolate and rectify the problem.

Security

We are committed to ensuring that your information is secure. To prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data for or on behalf of Shalva Israel do so in accordance with this policy and on the basis that Shalva Israel is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. Please note that, unless encrypted, email messages sent via the internet may not be secure and could be intercepted and read by someone else. Please bear this in mind when deciding whether to include personal or sensitive information in any email messages you send to us.

F. Web browsing and Cookies

Shalva Israel utilizes its website (www.shalva.org) to collect data submitted through the website by donors and others. You may receive communications from us that refer to or include links to the website but the responsibility for visiting the website is yours alone. The following comments summarize some of the matters relevant to the use of the website and are included here to inform Shalva Israel's supporters of them. However, use of the website is governed by Shalva Israel's privacy policy, which is published on the website [here](#) and which you are advised to read for a comprehensive view.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Traffic log cookies may be used to identify which pages are being used. This helps analyze data about web page traffic and improve a website to tailor it to users' needs. Information is only used for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help provide a better website, by enabling the monitoring of which pages a visitor finds useful and which they do not. A cookie in no way gives access to your computer or any information about you, other than the data you choose to share.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

The website may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type. This is anonymous

statistical data about your browsing activities and patterns and does not contain any personal data.

G. Links to other websites

Any website may contain links to other websites of interest. However, once you have used these links to leave a website, you should note that those operating the original website, such as Shalva Israel do not have any control over that other website. Therefore, Shalva Israel cannot be 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 policy. You should exercise caution and look at the privacy policy applicable to the website in question.