

## **Skilled Volunteers for Israel**

### **Privacy and Data Protection Policy and Notice**

[Last updated: March 14, 2021]

Skilled Volunteers for Israel (“**SVFI**”, “**English B’Yachad**”, “**EBY**”, “**we**”, “**our**”, “**us**”) respect the privacy of its Customers and is committed to protect the personal information that its Customers share with it. We are transparent about our practices regarding the information we may collect and use when you use the Services, apply for a position, are employed by us, visit our websites, or otherwise engage with us, and describe our practices in this policy and notice.

Skilled Volunteers for Israel serves Israel and the North American Jewish community. Through its flagship program, English B’Yachad (“**EBY**”), it provides individualized, online English tutoring and mentoring to Israeli young adults from socially disadvantaged backgrounds who seek improved English fluency and self-confidence to better compete in the Israeli job market. Through educational programming, **EBY** provides a unique opportunity for mature professionals from North America to be part of a community of volunteers improving the lives of Israelis from their homes.

Individuals making use of these Services are entitled to protection for their data as described in this policy and notice (the “**Privacy Policy**”). A Customer may be either an individual using or interested in using the Services in his private capacity or an entity. In addition, we may collect personal data from individuals, or individuals may provide personal data when using the Services, at our sites, websites, in the course of employment or candidates for staff positions, and others. This Policy also describes Skilled Volunteers for Israel’s practices for collecting, using, maintaining and processing information.

Customers who wish to engage with us or to use our Services may be asked to provide Skilled Volunteers for Israel with certain information including Personal Data and Sensitive Information as further detailed in this Privacy Policy (“**Data**”). Skilled Volunteers for Israel’s use of this Data in connection with the Services will be undertaken in accordance with this Privacy Policy.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## **1. WHICH INFORMATION MAY WE COLLECT?**

### **Data we collect about you prior to, and from, your use of the Services**

We collect and process non-identifiable and anonymous information, and also collect several categories of personal data ("**Personal Data**"), including sensitive personal data through your use of the Services. This may include your, and your spouse and dependents', name (first and last), nickname, birthdate, gender, nationality, job title, phone number(s), address, country, city, postcode, email and other contact details, family status, your bank account, credit card and other such payment and billing details, employment history, vocational and academic skills and qualifications, interests and preferences, and gender. Skilled Volunteers for Israel may also collect the email addresses of people who communicate with us via email or via messenger services or other social media platforms or create accounts and login credentials.

Skilled Volunteers for Israel may collect Personal Data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offenses, or related proceedings or any other data considered as sensitive under applicable law ("**Sensitive Personal Data**").

You do not have any legal obligation to provide any information to us. However, we require certain information in order to provide the Services. If you choose not to provide us with certain information, we may not be able to provide you with the Services.

We will never sell your Personal Data to third parties. (for more information see the Section titled: "Sharing Data gathered by Skilled Volunteers for Israel or with third parties").

## **2. HOW DO WE COLLECT PERSONAL DATA ON OUR CUSTOMERS OR USERS OF OUR SERVICES?**

There are two main methods we use:

**We collect Personal Data through your use of our Website.** In other words, when you are using the website or application, we are aware of it and may gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below. This may include technical information and behavioral information such as the User's Internet protocol (IP) address used to connect your computer to the Internet, your uniform resource locators (URL), operating system, type of browser, browser plug-in types and versions, screen resolution, Flash version, time zone setting, the User's 'click-stream' on the website, the period of time the User visited the website, methods used to browse away from a page, and any phone number used to call our staff members. We likewise may place cookies on your browsing devices (see section 'Cookies' below).

**We collect Personal Data required to provide the Services when you register with us.** In addition, we collect your Personal Data, when you provide us such information when filling out forms or by engaging with us.

### **3. WHAT IS THE PURPOSE OF PERSONAL DATA WE COLLECT?**

We will use Personal Data to provide and improve the Services and meet our contractual, ethical and legal obligations, including for example:

- carrying out our obligations arising from any contracts entered into between you and Skilled Volunteers for Israel and/or any contracts entered into between a Customer and Skilled Volunteers for Israel and to provide you with the information, products and Services that you request from Skilled Volunteers for Israel;
- administering your file with Skilled Volunteers for Israel;
- verifying and carry out financial transactions in relation to payments you make in connection with the Services;
- notifying you about changes to our Services;
- contacting you for the purpose of providing you with technical assistance and other related information about the Services;

- replying to your queries, troubleshooting problems, detect and protect against error, fraud or other criminal activity;
  - contacting you to give you information and inviting you to take part in other programs offered by Skilled Volunteers for Israel;
  - contacting you to inform you of additional services which may be of interest to you. We do this based on our legitimate interests in marketing our services;
  - taking pictures or use the photographs you appear in and their various derivatives if you participate in our programs or events of any kind and publish them for all our needs, including marketing, advertising, resource mobilization and more. Materials used include printed and online deliverables, social media, press releases, donation requests, and more. We do this based on our legitimate interests in promoting the programs and the events held by Skilled Volunteers for Israel and the services we provide;
  - compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, and for crime prevention and prosecution in so far as it relates to our staff, members, facilities etc.;
  - for security purposes and to identify and authenticate your access to the Services.
- Personal Data which you provide us may be combined with personal data which may be provided by other sources, all of which will be used for the purposes set out above.

#### **4. SHARING DATA GATHERED BY SKILLED VOLUNTEERS FOR ISRAEL WITH THIRD PARTIES**

We may transfer Personal Data to:

##### **Related organizations, subsidiaries and affiliates**

This includes: any member of our group, which means our subsidiaries - whether wholly or partially owned by us, in Israel, in the US and elsewhere, as well as our joint-venture partners who support our processing of Personal Data under this Privacy Policy. It also includes affiliates or other partners through which we provide our Services.

##### **Third Parties**

We transfer personal data to third parties in a variety of circumstances. We endeavor to ensure that these third parties use your data only to the extent necessary to perform their functions, and to have a contract in place with them to govern their processing on our behalf. These third parties may include business partners, suppliers, affiliates, agents and/or sub-contractors for the performance of any contract we enter into with you. They may assist us in providing the Services we offer, processing transactions, fulfilling requests for information, receiving and sending communications, analyzing data, providing IT and other support services or in other tasks, from time to time. These third parties may also include analytics and search engine providers that assist us in the improvement and optimisation of our website and our marketing. We periodically add and remove third party providers. At present our third-party providers to whom we may transfer personal data include also the following:

- Salesforce or other Customer Relationship Management systems
- Google Analytics
- email Marketing software such as Mailchimp
- Zoom web meeting room platform
- Visitors Registration system
- Project Management system
- Youtube
- Recruiting and applicant management software
- Accounting management services
- Survey companies

In addition, we may disclose your personal data to third parties: if we are under a duty to disclose or share your personal data in order to comply with any legal or audit or compliance obligation, in the course of any legal or regulatory proceeding or investigation, or in order to enforce or apply the terms of a contract we have with you or for you; or to protect the rights, property, or safety of Skilled Volunteers for Israel, our staff and Customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

For avoidance of doubt, Skilled Volunteers for Israel may transfer and disclose non-personal data to third parties at its own discretion.

## **5. WHERE DO WE STORE YOUR DATA?**

We may keep Personal Data in a database which will be owned and controlled by the Controller. The Data we collect is hosted on internal data centers and Cloud: Salesforce, Google Drive, YouTube, and Amazon.

Skilled Volunteers for Israel transfers data from its various locations as follows:

- Skilled Volunteers for Israel, for its program English B'Yachad, uses data gathered on its website to match volunteer tutors with students requesting our services in Israel. For matching purposes, data gathered in Israel and data gathered from volunteers are stored together on our customer relations management platform.

We may transfer your personal data in order to:

- Store or backup the information;
- Enable us to provide you with the Services and fulfill our contract with you;
- Fulfill any legal, audit or compliance obligations which require us to make that transfer;
- Facilitate the operation of our organization, where it is in our legitimate interests and we have concluded these are not overridden by your rights;
- To offer our Services across multiple jurisdictions; and
- To operate our organization, subsidiaries and affiliates in an efficient and optimal manner.

## **7. MODIFICATION OR DELETION OF PERSONAL DATA GATHERED BY SKILLED VOLUNTEERS FOR ISRAEL**

Customers may have a legal right under certain applicable laws to receive, rectify, erase, and restrict Personal Data about them that is held by us, to object to processing and, if processing occurs based on consent, to withdraw their consent.

If, for any reason, a Customer wishes to modify, delete or retrieve their Personal Data, they may do so by contacting Skilled Volunteers for Israel at [mgamoran@skillvolunteerisrael.org](mailto:mgamoran@skillvolunteerisrael.org). Skilled Volunteers for Israel shall perform the necessary process to identify the Customer as a Customer who has the right to retrieve the specific information and then furnish the data required to be amended, deleted or retrieved together with a specific identification of the Customer and data.

Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Skilled Volunteers for Israel for the purpose of operating the Services.

## **8. DATA RETENTION**

Skilled Volunteers for Israel will retain data it processes only for as long as required to provide the Services and as necessary to comply with its legal obligations, resolve disputes and enforce its agreements. Data will be kept in accordance with applicable best business practices and legal obligations.

Please note that some data will not be deleted and shall be kept in an anonymized manner.

Some metadata and statistical information concerning the use of the Services are not subject to the deletion procedures in this policy and may be retained by Skilled Volunteers for Israel. We will not be able to identify you from this data. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their Privacy Policy and their retention policy.

## **9. WEBSITE DATA COLLECTION AND COOKIES**

When you access or use our Services, We may use industry standard technologies such as Cookies, pixels and similar technologies, which store certain information on your computer or browsing device and which will allow us to identify the computer or device with the user, and to enable automatic activation of certain features, and make your Service experience much more convenient and effortless. We use different types of Cookies: some cookies are strictly necessary, they are required for the operation of our Site and under our terms with you; this includes for example, cookies that enable you to log into secure areas of our Service. We also use analytical and performance monitoring cookies, which allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. Finally, we use functionality cookies which are used to recognize you when you return to our Site. This enables us, subject to personalize content to your preferences, including for example, your choice of language or region.

Different cookies are kept for different periods. Session cookies are used to keep track of your activities online in a given browsing session; these cookies generally expire when the browser is closed but may be retained for a period on your device. Permanent cookies remain in operation even when you have closed the browser; they are used to remember your login details and password. Third-party cookies are installed by third parties with the aim of collecting certain information to research behavior, demographics. Third party cookies on our site include, for example, Google Analytics. Likewise, pixels from Facebook and others enable integration of third-party service providers (e.g. Facebook, Twitter) on our site. Third party cookies will be retained according to the terms of those third parties, and you can control those cookies in your browser settings.

We use Cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests and these are not overridden by your rights.



Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your online experience on our website will be limited.

How to disable cookies: The effect of disabling cookies depends on which cookies you disable but, in general, the website and some services delivered through it may not operate properly, may not recognize your device, may not remember your preferences and so on, if cookies are disabled or removed. However, allowing or disabling cookies is your choice and in your control. If you want to disable cookies on our site, you need to change your browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies can be found here: [Internet Explorer](#), [Google Chrome](#), [Firefox](#), [Safari](#).

Our websites may, from time to time, contain links to external sites. We are not responsible for the operation, privacy policies or the content of such sites.

## **10. SECURITY AND STORAGE OF INFORMATION**

We take great care in implementing, enforcing and maintaining the security of the personal data we process. Skilled Volunteers for Israel endeavors to implement, enforce and maintain security measures, technologies and policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of Personal Data. We likewise take steps to monitor compliance of such policies on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our website is safe.

Note however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

Within Skilled Volunteers for Israel, we endeavor to limit access to Personal Data to those of our personnel who: (i) require access in order for Skilled Volunteers for Israel to fulfill its obligations under this Privacy Policy and its agreements and (ii) have been appropriately and periodically trained on the requirements applicable to the processing, care and handling of the Personal Data (iii) are under confidentiality obligations as required under applicable law. We take steps to ensure that its staff who have access to Personal Data are honest, reliable, competent and trained.

Skilled Volunteers for Israel shall act in accordance with its policies to promptly notify the relevant authorities and data subjects in the event that any Personal Data processed by Skilled Volunteers for Israel is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. We shall promptly take reasonable remedial measures.

## **11. DATA SUBJECT RIGHTS**

Data subjects have rights under GDPR and local laws, including, in different circumstances, rights to access data, rectify data, object to processing, and erase data. It is clarified for the removal of doubt, that data subject rights cannot be exercised in a manner inconsistent with the rights of Skilled Volunteers for Israel's employees, with our proprietary rights, and third-party rights. As such, job references, reviews, internal notes and assessments, documents and notes including proprietary information or forms of intellectual property, cannot be accessed or erased or rectified. In addition, these rights may not be exercisable where they relate to data that is not in a structured form, for example emails, or where other exemptions apply. If processing occurs based on consent, data subjects may have a right to withdraw their consent.

If, for any reason, a data subject wishes to exercise these rights and modify, delete or retrieve their Personal Data, they may be able to do so by contacting Skilled Volunteers for Israel ([mgamoran@skillvolunteerisrael.org](mailto:mgamoran@skillvolunteerisrael.org)). Note that Skilled Volunteers for Israel may have to undertake a process to identify a data subject exercising their rights. Skilled Volunteers for

Israel may keep details of such rights exercised for its own compliance and audit requirements. Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Skilled Volunteers for Israel.

## **12. GENERAL**

Skilled Volunteers for Israel aims to process only adequate, accurate and relevant data limited to the needs and purposes for which it is gathered. It also aims to store data for the time period necessary to fulfill the purpose for which the data is gathered. We only collect data in connection with a specific legitimate purpose and only processes data in accordance with this Privacy Policy.

In the event of any concerns about data protection practices at Skilled Volunteers for Israel, you may contact our Founder at [mgamoran@skillvolunteerisrael.org](mailto:mgamoran@skillvolunteerisrael.org).

## **13. MINORS**

With regard to Personal Data about a minor under 16 years old, Skilled Volunteers for Israel will endeavor to process personal data only with the consent of the holder of parental responsibility over the minor. Skilled Volunteers for Israel will make reasonable efforts to verify that consent is given or authorized by the holder of parental responsibility of the child but cannot generally take responsibility for misrepresentation by persons as to their age.

## **14. CHANGES TO THIS PRIVACY POLICY**

The terms of this Privacy Policy will govern the use of the services, website and any information collected in connection with them. Skilled Volunteers for Israel may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will be available at: <https://skillvolunteerisrael.org/privacypolicy>. Changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of Services will constitute

your recognition and acceptance of the Privacy Policy's governing your personal data at Skilled Volunteers for Israel.

If you have any reasonable questions or comments concerning this Privacy Policy, you are welcome to send us an email or otherwise contact us at [mgamoran@skillvolunteerisrael.org](mailto:mgamoran@skillvolunteerisrael.org) and if we can help, we will make an effort to reply within a reasonable timeframe.

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