

Congregation Beth Am Congregant Privacy Guidelines

August 2016

Introduction

Congregation Beth Am (the “Congregation” or “CBA”) has deep respect for the privacy of its congregants. Protecting that privacy is of vital importance, a matter that the Beth Am Staff and Leadership take seriously. In order to help assure privacy, the Board of Directors of CBA (the “Board”) has adopted the following guidelines, protocols and practices (“Guidelines”) with regard to the collection, use and dissemination of information identifying or relating to members of the Congregation (“Congregant Information”). These Guidelines are not intended to establish policies or practices for the Congregation’s professional staff in their role as clergy, for which unique and independent responsibilities and obligations apply.

Congregant Information may be received or collected in various formats, such as contact data, photographs, videos, audio recordings, or through other traditional or electronic media. Any use or dissemination of Congregant Information, regardless of format, is to serve the Congregation and greater community, and not for any commercial purpose, and may be conducted through the Congregation’s various chosen channels of communication, while taking into account and respecting the privacy of our members and abiding by our legal obligations.

Overview

These Guidelines are intended to provide guidance to the staff and leadership of the Congregation, and to set expectations for congregants, for the collection, use and dissemination of Congregant Information, and also help instruct staff and volunteers who have access to Congregant Information on the treatment of, and application of safeguards on, that information.

Photographs, Video and Audio

1. From time to time, CBA captures photos, videos or audio (“Content”) of congregants for use in various ways, such as in printed materials, web pages/sites, emails, flyers posted on and off campus, electronic kiosks, or other traditional or electronic promotional platforms. Stricter practices apply to Content featuring or identifying congregants younger than age 18. In particular, Content that identifiably includes congregants under 18 will not be used or disseminated in any CBA channels of communication unless the Congregation has received a publicity release for the youth which was signed or authorized by a parent or legal guardian. **However, congregants under 18 may be visible during streaming of services/events either through their presence in the congregation or by their participation in the service/event.**
2. CBA Youth Education Registration materials will include a publicity release, which may be submitted either in writing or electronically.
3. If a publicity release has not been submitted for a particular youth, then CBA must obtain written permission from a parent or guardian prior to disseminating media content, such as a photo, video or audio, in which the child is identifiable.

4. Unless otherwise notified, CBA may use and disseminate Content that includes adult members of the Congregation through its chosen channels of communication, whether in printed or electronic form, without express consent. However, special permission shall be obtained from prominently featured adult members in certain circumstances, including:
 - a. Content relating to our Purim festivities
 - b. Content used with the Member's name attached (e.g. Member Spotlight).
5. New adult members will have the opportunity to "opt out" of having Content in which they are identifiably featured in a CBA publication. New member forms will advise the prospective member that CBA may use and disseminate Content which identifiably features adult members unless consent is expressly withheld in writing.
6. The Annual Pledge letter may be used from time to time as a reminder that CBA may use or disseminate Content that includes adult congregants unless consent is expressly withheld in writing.
7. Except as expressly approved, CBA will not disseminate Content through its chosen channels of communication in which a congregant is identified by name, whether in print or through "tagging," meta data or by other means.
8. The restrictions in these Guidelines do not apply to CBA clergy or staff, who may be featured and identified in Content that is used or disseminated by or on behalf of the Congregation without the express consent of such clergy or staff.
9. CBA, from time to time, records various events or programs for public use in which adult members participate and are identified in the audio recordings (e.g., podcasts of weekly Torah Study). These recordings are not subject to the restrictions set forth in these Guidelines and may be used and disseminated through CBA's chosen channels of communication without the express consent of participating members.

Member Contact Information

CBA collects information about its members including, but not limited to: mailing address, phone number, email address, birthdates, interests, backgrounds, child(ren)'s name(s), workplace, and religious background. As a general guideline, a congregant's most basic contact information (name, mailing address, email address) may be shared within our congregational community, but not outside our community, unless permission is specifically granted, whereas other non-basic information we collect (i.e. beyond what is listed in the Membership Directory) may not be shared in this manner. Following are our guidelines related to contact information:

1. Beth Am circulates its Membership Directory to its own members and Staff, which includes names, home addresses, phone numbers and email addresses.
2. Similarly, this basic contact information is available to members via the password protected "Members Only" section of the betham.org website.
3. If a congregant calls the office to ask for the contact information of a fellow congregant, the office Staff is permitted to release this information, limited to what is in our Directory.

4. CBA is authorized to release congregant names and home addresses to the URJ for the purpose of initiating a subscription to the "Reform Judaism" magazine.
5. CBA is not authorized to release congregant contact information in the form of a mailing list to any non-members or other third parties, including Jewish organizations. Exceptions to this include the URJ and bonded mail houses handling CBA's own mailings.
6. When using a mailing address of a congregant in our publications and media, an "alias name" shall be used instead of the congregant's name (e.g. Kickoff Dinner, 123 Main Street, Los Altos, CA).
7. When providing a phone number of a congregant in our publications and media, we will only use a first name (e.g., RSVP to Connie at (650) 555-1234).
8. Alias emails shall be set up and utilized when listed in our publications or media, in order to help prevent spam and maintain privacy (e.g., RSVP to Poltava@betham.org). The Beth Am office can help establish alias emails; or, as an alternative, for one time events, a Gmail or Yahoo email address is recommended (e.g., Poltava_event@gmail.com).
9. CBA will not release any personal contact information of any of its congregants that connects a name with a photograph or video, on any form of online social media, without first receiving permission from the congregant(s).
10. Third Party Agreements with CBA vendors shall contain language to protect the privacy of our members.
11. From time to time, our Clergy or Staff, or trained volunteers may face a situation in which it may be appropriate to release member information to a third party. They may use their discretion to do so on a case-by-case basis (e.g. a delivery of food or reading materials to a homebound congregant).

Lifecycle Events and Congregant Stories

The dissemination of information regarding the lifecycle events of our members (e.g. births, deaths, Bar/Bat Mitzvahs, special birthdays or anniversaries, or special accomplishments) as well as sharing stories about our members may involve sensitive information, and must be handled with sensitivity. Our guidelines will categorize the dissemination into methodologies:

- Open Communication both internal to CBA and external to the public at large.
 - Internal Communication within the CBA community only (which would exclude our Beth Am website, *The Builder*, Facebook or telephone requests from non-congregants).
 - No Communication in which the information is not released to anyone.
1. Information regarding a congregant's health will fall under No Communication, unless specifically authorized by the congregant. CBA will strictly adhere to HIPPA standards.

2. CBA will announce births, baby namings, brits, deaths and other lifecycle events via Internal Communication channels, with the authorization from the family. Lifecycle information will not be provided to non-congregants unless authorized by the family.
3. Full names of congregants may be used for Internal Communications of lifecycle events. Congregant permission must be obtained prior to any Open Communication. Two exceptions to this policy are the listings of the Confirmation Class and Adult B'nei Mitzvah Class in the monthly *Builder* in a congratulatory article, as has been our custom.
4. Since B'nei Mitzvah names/photos are published in certain communications such as "This Month at Beth Am" or in the "*J Weekly*" magazine, the B'nei Mitzvah Handbook includes language alerting parents of these particular communications.
5. Beyond lifecycle events, from time to time, we like to communicate interesting stories or accomplishments of our congregants, such as in a *Builder* article. In such instances, permission must be granted by the family ahead of any Internal or Open Communication.
6. The aforementioned policy applies to our congregants, and does not apply to guest speakers or performers, in which Open Communication is the norm.
7. We will only record a guest speaker or performer with his/her permission ahead of time, and would only use such recordings with permission.
8. Clergy may use their own discretion in communicating with non-members in sensitive situations to override this policy.
9. Whereas we realize we cannot control the actions of our congregants relative to sharing congregant-related information that is not deemed Open Communication, we can try to educate and suggest adherence to our privacy goals to our congregation, recommending congregants call the CBA office with questions.

Streaming of Services, Events, Lifecycle Ceremonies

Congregation Beth Am seeks to make all of our services and programs widely accessible for our congregants, relatives and friends. In the interest of expanding accessibility to the Beth Am community, the audio-video content of services and programs at Beth Am may be streamed live on the internet. Those that are unable to attend a service or program will thus be given access to the service/event at www.betham.org/streaming and potentially other online venues.

CBA respects the privacy of people who attend our services and programs. We seek to avoid revealing identifying information, including video images, without a person's knowledge and permission. When CBA plans to use audio-video recording and transmission equipment at location, CBA will take the following steps to inform people in advance so that they can make a choice to attend, opt out of the event, or seek a seating accommodation where they will not be visible in the video:

1. Prior to an event with attendees, Beth Am will make efforts to notify potential attendees and participants that an event will be audio-video streamed and recorded through notifications in existing CBA print publications, email announcements and web communications.
2. Prior to an event with scheduled guest speaker(s) or performer(s), CBA will request their written permission to use audio/video equipment by completing and signing a Beth Am media release form. For minors participating as speakers or performers, an adult parent or guardian is required to sign the release form. At the discretion of the Executive Director, verbal, email, or other written permission will be an acceptable substitute for the release form. If a person's permission is denied or not received prior to the event, then CBA will not use audio/video equipment during that person's speech or performance.
3. At the time of an event, CBA will prominently post clear audio/video notification signage at all usual entrances to that venue (e.g., Sanctuary doors). The signage will notify all who enter that audio/video recording equipment is going to be used and that by entering the location, they are giving their consent to allow their appearance in Beth Am streaming or recordings. During an event, attendees' identifiable image may be visible in video streaming and recordings due to where they are positioned and how they participate in an event and its activities.
4. At the discretion of the event organizer or leader, an announcement may be made to notify the audience that audio/video recording equipment is in use. At the discretion of the event organizer or leader, ushers may be available to help find seating for individual who request to not be visible in the video.
5. CBA may use audio-video equipment during baby namings, brit milah, memorial services, B'nei Mitzvah and other lifecycle events. In such instances, CBA will request permission to use audio-video equipment from the primary adult(s) responsible for organizing the lifecycle event. CBA will notify the responsible adults that by allowing use of audio-video equipment, identifying information may be revealed publicly during live streaming and in recordings accessed in the future. Such information may include full names, birthdates, dates of death, and shivah/burial time and location information. If permission is denied or not received prior to the event, then CBA will not use audio/video equipment during that lifecycle event. Depending on the nature of the event, the Executive Director may choose to require individual speaker/participant permissions as indicated in paragraph 2 above.

Financial Information

1. Privacy controls over credit card information received by CBA Staff is of utmost importance. Postcards utilized for storing credit card data will be safely secured in a locked location, and will be shredded after one year of retention. **Note:** CBA engages outside auditors to review its control procedures. Our credit card security processes will be reviewed and may be adjusted based upon this review.
2. Online payment security controls exist in that CBA Staff do not see an individual's credit card data when payments are executed via credit card or PayPal.
3. The following provisions pertain to our treatment of donation information:
 - a. CBA will acknowledge gifts in someone's honor or memory by mailing a letter to the honoree acknowledging the donor and the fund donated to, but not the amount.

- b. Donors are acknowledged in the monthly “This Month at Beth Am” email, listed by fund and nature of the gift (“in memory of...”), with no amount, unless they elect to opt out of such internal communication.
 - c. From time to time, a donor may be mentioned in the monthly Builder (Open Communication). Amounts will not be listed, and the article will only be published with the congregant’s permission.
 - d. CBA will periodically conduct auction fundraisers, in which amounts donated are easily connected to the donor publically, as is the nature of the event. Any related auction paperwork of purchase information will be handled with extreme care.
 - e. With regard to the Annual Campaign, periodic email updates and an annual report are created and include a listing of donors in named groupings. There are no donation amounts listed in these vehicles. (We note that in a separate mailing, launching the campaign, through named groupings which are ascribed to various dollar thresholds of gifts).
 - f. Based on our By-laws, the name of a donor will not be affixed to any wall or structure on the Beth Am campus.
 - g. CBA will create a new named fund (which may include the name of a congregant) for an initial donation of 1% of our operating budget to open the fund.
4. CBA will never disclose the name of any individual or family in financial need. Such matters are handled with the utmost discretion by our Staff.
 5. CBA, from time to time, may engage a vendor with a software interface that creates a small donation amount to CBA, if our congregants register and shop at various online retail sites. As with all third party vendors we interact with, we will insure our congregant’s personal data is not used for any purposes other than for which it was intended.

Social Media

1. Approved social media platforms/channels are currently:
 - a. Facebook
 - b. Twitter
 - c. YouTube
 - d. LinkedIn
 - e. SlideShare
 - f. Vimeo
 - g. Animoto
 - h. Yammer (The Beth Am Network)
2. A Staff member may make the decision to open an account on a new social media platform, with the approval of the Executive Committee.
3. Staff members may post freely through such channels but should not post any information that could jeopardize CBA’s nonprofit status (e.g., endorsing a candidate in an election).
4. If a Staff member is posting a point of view that may or may not reflect that of the CBA’s Staff and Leadership as a whole, the posting should clearly state that it represents personal thoughts of the writer (i.e. “From the Desk of Rabbi XXXXX”).

5. All postings from Staff members should always be in good taste and appropriate to our values, as the Congregation is being represented.
6. Congregants may post, with proper discretion, information about the service offerings of their profession, if helpful to the community (e.g. realtors, lawyers, financial planners, etc.).
7. Congregants may post, with proper discretion, inquiries asking for referrals (plumber, home to rent, etc.).
8. Personally identifiable information should not be posted unless prior permission is obtained, or the Congregant is posting about himself or herself.
9. Photos from a recurring event held off campus (not of children without consent) may be tagged with specific location information as long as the event recurs at that locale (e.g., Beth Am Men monthly breakfast at Hobe's).
10. Group members of all Beth Am related social media groups (including Beth Am teen groups, Beth Am Men, Émigrés) shall be active CBA members. Former members should be taken off the groups.
11. In general, the Communications Director will monitor the CBA Facebook page, and other social media channels, as the "Administrator." Inappropriate postings (including photos/videos) will be removed at the discretion of the Administrator. The Executive Director or a Clergy Member may be consulted as needed.
12. If the Communications Director is unavailable to monitor for more than 2 days, a backup Administrator will be appointed for this role.
13. CBA sub-groups, such as Beth Am Women, shall designate their own Administrator for monitoring purposes.
14. When a congregant posts a question publicly requesting a response, the Administrator shall determine whether a public response is warranted, and if not, may either respond privately or not at all. The Executive Director or Clergy may be approached for guidance on sensitive matters.
15. If a CBA sub group wants to create a new social media platform (e.g., Torah Study group), the Executive Director shall be consulted prior to its creation. As a new platform is created, an Administrator shall be appointed to monitor the postings for appropriateness.

Conclusion

This document is not intended to regulate data security concerns related to the computer network and firewalls, and safeguards thereof, such as credit card safety. It is furthermore not intended to establish policies or practices of Beth Am's professional Staff, including the Clergy, for which unique and

independent responsibilities and obligations apply. Nor is this document intended to govern Human Resource issues and related workplace violations among the Beth Am Staff. Rather, this document is focused on the privacy concerns of our congregants and how we regulate and manage these concerns.