



GDPR Policy Changes and Legitimate Interests Assessment

GDPR Legitimate Interest Processing

KAHAL has determined that it processes individual user data in furtherance of the legitimate interests of the organization and is therefore within its rights under the GDPR to continue to process and store user data within a secure, protected system. KAHAL has determined that it cannot effectively pursue its mission without the minimal processing of user data employed by the organization, and that such interests are of immense personal and public benefit to its members and to the world at large. KAHAL has determined that it cannot reasonably achieve the same results without the processing of this data and will work to ensure that it uses the minimal amount of data necessary to do so.

KAHAL posts the following data use and protection notice on all signup forms and on its website:

KAHAL collects the information contained on this form in furtherance of the legitimate interests of its mission, to give the tens of thousands of Jewish students studying abroad each year the resources, tools, and connections they need to meaningfully engage with the Jewish community and deepen their Jewish identity during one of the most important, meaningful, and enduring experiences of their lives. All personal information is collected for use by KAHAL staff in determining the best and most relevant opportunities and services to which to direct and provide its members, including direct personal connections to other KAHAL members and affiliates. While KAHAL may collect special data on its members, including religious views, it does not store this information beyond immediate use and strives to provide relevant services and opportunities to all qualified members regardless of religious belief or practice. By submitting this form, you are consenting to KAHAL processing your personal data specifically for the purposes identified above. If KAHAL chooses to ask you for personal information outside the scope of this form and/or outside the legitimate uses described in its LIA, KAHAL will explicitly inform members of its intentions and collect any additional consent required by law. You may withdraw consent, in line with GDPR Doc 2.7A, at any time by removing yourself from mobilize through your online profile or by emailing your request for system deletion to info@KahalAbroad.org.

The following legitimate needs assessment (LIA) is posted on the KAHAL website at www.KahalAbroad.org/GDPR

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

KAHAL processes the data of its members to successfully execute its mission—creating and facilitating transformational Jewish experiences for study abroad students. KAHAL’s only benefits from the processing of members’ data are directly correlated to the benefits enjoyed by its members, which can only result from the processing of said data. To the extent third parties benefit from the processing of this data, it is only within the legitimate, expected realm of use and for the direct benefit of the member. Directly serving the interests of thousands globally, KAHAL’s positive societal impact would be impossible without the processing of members’ data. Any data outside of that which is vital to this service is not collected, shared, or otherwise used in any form. KAHAL complies with all data protection laws in effect in the United States and European Union, as well as all industry guidelines and best practices in the field of nonprofit management. KAHAL also does not share member information with anyone outside its vetted, pre-listed member database, Mobilize, to which all members have direct access.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

KAHAL's impact relies on its ability to interact freely and directly with its members, and for members to interact with one another. KAHAL does not process or make available any information beyond that which is absolutely necessary for the execution of our mission, and no actions in furtherance of this mission would be possible without the processing of member data. KAHAL strives to process the least amount of data possible and is committed to the security of all data stored within its secure, protected systems.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?

KAHAL does not collect any criminal offence data in furtherance of its mission. KAHAL may collect, with consent from members, special category data related to religious views. KAHAL does not store this data beyond immediate use and only upon express consent from the member. KAHAL only collects private data from members through direct, personal interactions with members and affiliates and through online, direct-submit forms. Any/all information of this nature is voluntarily provided with the understanding that it will be visible to KAHAL staff and, in some cases, other members. Members are aware of which information will be visible to other members and have the option of omitting such data. KAHAL does not process data from vulnerable populations.

Reasonable expectations

- Do you have an existing relationship with the individual?
- What's the nature of the relationship and how have you used data in the past?
- Did you collect the data directly from the individual? What did you tell them at the time?
- If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?
- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?
- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

KAHAL maintains a personal relationship with all individual members and only uses members' data in furtherance of its mission. KAHAL collects information directly from members and from organizations and individuals who have a direct relationship with members. In doing so, KAHAL clearly and effectively communicates the necessity of this data and any future uses therewith. All information has been collected in the last five years and is stored securely in KAHAL's protected system. KAHAL's intended uses of this data are clearly listed on its website, on all signup pages, and discussed in-person when meeting with prospective members. KAHAL's email open rate, which consistently rates nearly 3x higher than industry average, confirms this.

Likely impact	
<ul style="list-style-type: none"> • What are the possible impacts of the processing on people? • Will individuals lose any control over the use of their personal data? • What is the likelihood and severity of any potential impact? • Are some people likely to object to the processing or find it intrusive? • Would you be happy to explain the processing to individuals? • Can you adopt any safeguards to minimise the impact? 	
<p>KAHAL does not anticipate any adverse effects on individuals due to its use of member data. Individuals do not lose control over their personal data and can directly access their profile within KAHAL's system at any time, where they can change and/or delete any and all data held by KAHAL.</p> <p>KAHAL has enacted safeguards to minimise any potential adverse impact on participants in the form of junk email communication and will continue to do so.</p>	
Can you offer individuals an opt-out?	Yes

Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes
LIA completed by	Alexander Jakubowski, Executive Director
Date	6/25/2018