

DATA PROTECTION CAMPAIGNING QUICK GUIDE

INTRODUCTION

The enforcement of the General Data Protection Regulations (GDPR) and Data Protection Act (2018) have brought about significant changes in the way that we are able to use personal data. It is therefore essential that you familiarise yourself with the guidelines below before handling or collecting personal data.

WHAT IS PERSONAL DATA?

Personal data is any information relating to natural persons (living people) that can identify them directly or that can indirectly identify them by using this information in combination with other information.

This includes (but is not limited to):

- Names
- Email addresses
- Postal addresses
- Telephone numbers
- Social media usernames
- IP addresses
- Canvass data
- Photographs

Personal data does not necessarily need to be factual, opinions or predictions about an individual are also personal data.

Any data held by the Liberal Democrats must be handled according to the Liberal Democrats [Data Protection Rules](#). A violation of the Data Protection Rules may result in disciplinary and legal action.

Data Officers are responsible for granting or restricting access of Lib Dem data to volunteers within their local party. A non-member volunteer who will be handling personal data should be asked to complete a [Volunteer Non-Disclosure Agreement](#) (NDA) before being granted access to Liberal Democrat data.

THE DATA CONTROLLER

The Liberal Democrats Federal party is the data controller for Liberal Democrat data. Elected representatives including Councillors and MPs are data controllers in their own right for their casework data.

PROCESSING PERSONAL DATA

If you are doing anything at all with personal data you are processing it, this includes (but is not limited to):

- Storing
- Modifying
- Erasing
- Recording
- Organising
- Disseminating
- Sharing

Any data you are processing must only be processed using an approved Lib Dems supplier. The full list of approved suppliers can be found at libdems.org.uk/GDPR. Under the GDPR we are obligated to ensure that there are data processing agreements in place with all data processors.

FAIR PROCESSING NOTICES

Any data gathered from individuals must be done using a [Fair Processing Notice](#) (FPN). This is a legal obligation, any data gathered without the use of an FPN will be considered to have been gathered unlawfully and cannot be used.

If the data is being gathered on nonverbal material the FPN must be situated close to where the data is being gathered and must be clear and legible.

It is possible to give an FPN verbally by explaining how the individual's data will be used and by signposting them to the [privacy policy](#) on the Lib Dems website for more detailed information.

COLLECTING CONTACT INFORMATION

When gathering contact details including email addresses, social media handles and phone numbers it is important that the individual explicitly consents to receiving communications from you.

This can be achieved by inserting check boxes on to a form used for gathering data which ask the individual to check the box if they are happy to receive communications from the party.

Please note that you can only communicate with the individual for the purpose/s that they have given you permission to communicate with them about. For example, if an individual signs a petition and ticks a box which says 'I am happy to receive emails about the progress of this petition' you can only send them emails related to the petition as they have not given permission to be contacted about anything else.

SENDING COMMUNICATIONS

When sending communications to voters make sure you honour contact preferences and always include a mechanism for opting out of communications.

If you are sending an email to 15+ people you must use an approved bulk email provider e.g. Mailchimp, Nationbuilder or Prater Raines. You must not send emails to large numbers of people using the BCC/Blind Copy function available in regular emails.

DOWNLOADING DATA

Do not download data from Connect/Salesforce/Nationbuilder unless it is absolutely necessary. Any downloaded data must be deleted/destroyed as soon as it is no longer needed.

DATA SUBJECT RIGHTS REQUESTS

The GDPR provides individuals with a number of rights regarding their data these rights are:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

If an individual makes a data subject rights request to your local party you must notify HQ by emailing data.protection@libdems.org.uk. It is important to be aware that there is no set format that an individual must use to make their request, a request can be made verbally or in writing and there is no need for the individual to make reference to the GDPR or Data Protection Act. If in doubt about whether you have received a data subject rights request please contact HQ as soon as possible.

We are required by law to respond to a data subject rights request within 1 calendar month, it is therefore essential that these requests are sent to HQ as soon as they are received.

Once you have passed on the request to HQ, there is no further action needed by the local party unless instructed otherwise.

THE PRIVACY AND ELECTRONIC COMMUNICATIONS REGULATIONS

The Privacy and Electronic Communications Regulations (PECR) sit alongside the GDPR and Data Protection Act. They give people more privacy in relation to electronic communications. There are specific rules on marketing calls, emails, texts and faxes. Unsolicited calls from us are deemed as marketing calls.

- You must not use SMS to contact voters under any circumstances
- You must not purchase phone numbers from data vendors
- You cannot call numbers registered under the Telephone Preference Service (TPS) unless the individual has specifically opted in to receiving contact by phone from the party and you can prove they have done so
- An individual has the absolute right to opt out of receiving communications for marketing purposes

SHARING PERSONAL DATA

Data must not be shared outside the Liberal Democrats except for use by an approved supplier for administrative/transactional purposes.

Personal Data should only be sent by email if it is absolutely necessary. Where it is necessary, data must be encrypted. Full details on encryption can be found at www.libdems.org.uk/GDPR. When using encryption, you must send the password using a different method to the method that you sent

the data. For example, if you send the data by email, you should send the password by text, face to face or by telephone call.

It is important to choose a strong password to encrypt your data with, the password should contain a minimum of 8 characters and include a combination of lowercase and uppercase letters, numbers and characters.

You cannot use memory sticks to store personal data under any circumstances.

Be aware of data being offered to you by other campaign groups. Campaigners must not accept or add to our systems any data that has come from another campaign group. Even campaign groups that mainly contain persons who also happen to be Liberal Democrats.

DESTRUCTION OF PERSONAL DATA

Personal data should be destroyed once it is no longer needed or according to our [retention policy](#).

In the case of data stored on a computer, the data must be deleted from the 'deleted items' or 'trash can' folder.

In the case of hard copy data, documents containing personal data should be shredded using a crosscut shredder or using a professional confidential waste disposal service.

DATA BREACHES

If you become aware of a data breach you must report the breach immediately to Data.Protection@libdems.org.uk. Examples of data breaches include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- Sending an email to multiple recipients with the email addresses exposed;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

More information about data protection can be found at libdems.org.uk/GDPR

If you have any data protection queries please email: data.protection@libdems.org.uk