

# Data Protection: Quick Guide

## Introduction

Processing confidential Party information and Personal Data must be done in a way that is lawful, transparent and understood by individuals. We want to promote trust and confidence in the way the Liberal Democrats handle personal data; getting it wrong could cost us financially and reputationally.



This quick guide gives an overview of what we can do to ensure we handle and process personal data lawfully whilst achieving our aim of effective and positive campaigns.



## What is personal data?

Any information relating to natural persons (living people) that can identify them directly or indirectly ie: combining with other information.

Examples:

Names	Email addresses	Postal addresses	Phone numbers	Social Media usernames
IP addresses	Canvas data	Photographs	Videos	Opinions or predictions

Anything you do with personal data: storing, modifying, erasing, sharing, recording is called 'processing'.

## Who is the Data Controller?

The Liberal Democrats Federal Party is the Data Controller.

*(Elected representatives including Councillors and MPs are data controllers in their own right for casework data.)*



## How can we prepare ourselves & improve our understanding?

- Any data held by the Liberal Democrats must be processed according to the Liberal Democrats Data Protection Rules <https://www.libdems.org.uk/gdpr-data-protection-rules>
- Volunteers, who are not members and handling personal data MUST read and sign a Volunteer Non-Disclosure Agreement (NDA) before handling personal data <https://www.libdems.org.uk/dpm-volunteer-nda>
- Make use of the guidance available on the Lib Dems website - [type GDPR into the search function](#)
- As an approved General Election Agent you will be required to complete online UK GDPR training which we will send to you.
- Use approved suppliers; including printers and postal solutions (if you need a new supplier let us know and we can check them) <https://www.libdems.org.uk/gdpr/new-approved-suppliers>

## Fair Processing Notices

When communicating with voters and gathering their data we must follow data protection (DPA & UK GDPR) and electronic marketing (PECR) laws at all times.

We always need to be clear with individuals about why we are collecting their data and what we plan to do with it.

The way we do this is through a Fair Processing Notice. It is a legal obligation for us to include an FPN

<https://www.libdems.org.uk/privacy-advice> when we gather personal data, if we don't then the data collected CANNOT be used.



### Remember:

Make sure the FPN is clear and legible and close to where the data is being gathered.
The campaigns team has templates you can use with the FPN included.
Destroy using a secure method any unwanted paper copies, once you have recorded the data or finished your petition/survey and no longer need the hard copies.
Face to face or on the phone - there are scripts and FPNs to use in these instances.



## Collecting contact information

When gathering contact details for further communication, make sure a tick box is included on the form, this ensures explicit consent from the individual. (The templates have examples of these).

If you gather their contact details on the phone or face to face, make sure you give them a calling card/leaflet with the FPN on or explain on the phone where they can find our main Privacy Notice and how they can Opt Out in the future. (FPN scripts explain this further).

## Sending communications

Make sure you have honoured contact preferences, please don't use old contact lists, run the data anew for each mailing and delete it once you are finished with it to avoid storing duplicate data lists.

Always include a mechanism for opting out of communications (approved bulk email providers have this embedded in the footer).





Under PECR there are some specific rules relating to electronic marketing communication.

- Do not use SMS to contact voters under any circumstances.
- Do not purchase phone numbers from data brokers (HQ are constantly monitoring the regulation and possible vendors as to when this may be lawful again).
- Do not call numbers which are registered under the Telephone Preference Service (TPS) unless the individual has specifically opted in to receiving phone calls from the Party and you can prove this.

• Remember - individuals have the ABSOLUTE right to Opt Out of marketing. Please forward all such requests to: [data.protection@libdems.org.uk](mailto:data.protection@libdems.org.uk)

### Data Subject rights requests

Sometimes, individuals are unhappy that we've contacted them and wish to exercise their rights under UK GDPR.

We know these as: Opt Outs, Right to be forgotten and Subject Access Requests (SARs).

Individuals can do this in writing or verbally and when this happens, please email us at

[data.protection@libdems.org.uk](mailto:data.protection@libdems.org.uk) as soon as possible with the request from the individual.

We only have one month to respond to these requests, so the sooner you email us, the better.



### Sharing personal data

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

If you need to send data by email, even between members, please ensure you password-protect that data and send the password by a different method.

Memory sticks to store personal data as a method of transfer are NOT permitted under any circumstances.

### What happens if there's a Data Breach?

If you become aware of a data breach, or think a breach has happened, you must report it to [data.protection@libdems.org.uk](mailto:data.protection@libdems.org.uk) as soon as possible with a summary of what happened and we'll work with you to minimise the breach and report to the ICO if we need to.

Examples of data breaches are:

- Access to data by an unauthorised person (deliberate or accidental)
- Alteration of personal data without permission
- Losing laptops/phones containing personal data
- Sending a group email with the email addresses exposed
- Sending data to the wrong person