



**Data Protection Notice
January 2021**

LABOUR PARTY

The Labour Party is a membership-based and participative organisation. It compiles and maintains list of party members, with names, addresses and contact details, and the positions that they occupy in the Party organisation.

The Party's data controller is the General Secretary Billie Sparks [contact details] and its data protection officer is the Party's legal and policy adviser Finbarr O'Malley [contact details].

In terms of the General Data Protection Regulation, the Party relies on the following three bases for the processing of information relating to its members –

- Article 6 (1) (b): the relation between Party and member – and between the members – is a contractual one and data processing is necessary for the performance of the contract
- Article 6 (1) (e): the use of personal data by a political party is necessary for the purpose of communicating in the course of electoral activities, which is deemed to be the performance of a task carried out in the public interest by section 39 of the Data Protection Act 2018
- Article 6 (1) (f): it is in the legitimate interests of a registered political party to manage and direct its internal organisation and activities in accordance with its duly registered party constitution.

Members can expect to be contacted in relation to Party activities, using the contact details they have agreed to provide.

The Party membership list, including contact details, is maintained in Head Office, and appropriate details from the list are provided to constituency and branch chairs and secretaries. These officers are required to notify any changes in membership and contact details to Head Office.

Head Office also provides local membership lists to public representatives and to local area representatives, as well as to officers of Party Sections.

These local or sectional membership lists are provided only for use in relation to Party business, arising from the performance of official functions. Retired officers should delete or destroy information acquired by them that is no longer required.

Where internal elections arise, Head Office will provide contact details for members of the relevant electorate to all declared candidates, in an equitable and timely manner.

Again, those lists can be used only for the purpose of the relevant election and should be destroyed or deleted when no longer needed for those purposes.

Party officers and members are reminded of their obligations under GDPR and are expected to use personal data including contact details only for the purpose for which they have been provided. They should keep such information reasonably securely. Party membership lists, including local and sectional lists, should not be printed out or distributed, and should be stored on secure, password-protected electronic devices.

Members who, even with such precautions, are cautious about disclosing email addresses are reminded that it is good practice to have a secondary email account for sensitive or confidential correspondence (e.g., bank accounts, business correspondence, etc.), if the user wants additional protection against the risk of data being compromised.

Personal data is not automatically removed when membership lapses, in order to allow for late payments of membership fees in arrears. Under the Party Constitution, a member's whose annual membership fees have been unpaid for 2 consecutive years is deemed to have resigned from the Party. Accordingly, data is retained for this purpose for no more than 2 ½ years, in order to allow for late renewals and to correct any errors or omissions.

Furthermore, there is an historical value in retaining archives of Party membership and activities. A 'snapshot' of the database taken in January each year is retained for archival and historical reference purposes. The Party archives in Head Office are available for *bona fide* historical and academic research purposes, with the approval of the General Secretary, and are not otherwise accessible to the general public or to Party members, officers or staff. (Archive material dating from before 2015 is available for consultation in the Irish Labour Party Archive, 1919-2014, at the National Library of Ireland.)

Every Party member has the right to request from the General Secretary access to and rectification or erasure of personal data or a restriction of processing concerning the member, or to object to processing.

Furthermore, any member who is dissatisfied with the manner in which his or her data has been processed has the right to lodge a complaint with the Data Protection Commission (see <https://www.dataprotection.ie/>).