



PROVINCIAL GRAND LODGE OF CORNWALL

The introduction of the HERMES system fundamentally changes the Province of Cornwall's **Record of Processing Activities (RoPA)** by centralising data storage and shifting the primary mechanism of administrative processing from local files to a unified digital platform.

This RoPA reflects this shift by formalising UGLE's role as a Data Processor for the HERMES system and by detailing the security reliance on the central platform.

RECORD OF PROCESSING ACTIVITIES (RoPA)

1. General Update: Key Content

The RoPA's **Key Content** section must be updated to specifically reference the HERMES system as the primary administrative tool:

Old Requirement	HERMES-Related
Purposes of the processing	Must now detail the systematic nature of processing required for the operation of the HERMES platform (e.g., "Real-time registration, attendance recording, and returns").
Recipients	Must clearly distinguish UGLE as both an Independent Controller (for archive/registry) and a Data Processor (for providing the HERMES service/hosting the data).
Retention periods	Must reference UGLE's central retention policy for data held in HERMES (e.g., 100 years for resigned members).
Security measures	Must explicitly reference the reliance on the Technical and Organisational Measures (TOMs) implemented by UGLE on the HERMES platform, as required by the Data Processing Agreement.





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2. Updated RoPA Structure (Mandatory Activity)

A new, mandatory column for 'Location of Processing' has been added, as the location of data is now centralised and crucial for defining security measures.

Processing Activity	Categories of Data Subjects	Categories of Personal Data	Lawful Basis	Recipients	Location of Processing/Data Storage	Retention Period	Security Measures
Masonic Membership Administration (via HERMES)	Craft Members, Candidates, Former Members.	Full Name, DOB, Contact Details, Masonic History (Lodge/Office), Attendance Records, Candidate Vetting Status, Fees/Dues Status.	Legitimate Interests (Governance); Contractual Obligation (Membership).	UGLE (as Controller and Processor - via HERMES); Lodges (via HERMES access).	Primary Storage: HERMES central database hosted by UGLE at Freemasons' Hall, London. Secondary: Local devices accessing HERMES.	Active Member: Retained until resignation/death. Former/Expelled Member: Retained by UGLE for 100 years for disciplinary/re-application checks. Historical Record: Retained indefinitely for archive purposes.	For HERMES Platform: Reliance on UGLE's contracted Technical and Organisational Measures (TOMs) (e.g., encryption, access controls, backups) as specified in the DPA Schedule. For Local Access: Secure, password-protected access only (Provincial DPO/Secretary).
Almoner's Welfare	Members, Dependents.	Contact details, Health/Welfare information (Special Category Data).	Legitimate Interests (Welfare); Explicit Consent (for Special Category Data).	Provincial/Lodge Almoner; Charity Organisations.	Primary: Provincial Office secure filing/password-protected cloud. NOTE: <i>Sensitive welfare data is discouraged from being stored in HERMES.</i>	7 years post-resolution of case (if locally held).	High-level encryption and restricted access controls for any local electronic files.pdf].





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3. Update to Security Measures Section

The overall security narrative of the RoPA should be updated as follows:

General Description of Technical and Organisational Security Measures (Article 32)

The security measures implemented by the Provincial Grand Lodge of Cornwall are structured in two tiers following the introduction of HERMES:

1. Centralised Data (HERMES):

- The Province relies on the **United Grand Lodge of England (UGLE)**, acting as the Data Processor, to maintain robust **Technical and Organisational Measures (TOMs)** for the HERMES platform.
- This includes secure hosting, database encryption, regular backups, and role-based access controls to the central system.
- The Provincial DPO conducts periodic checks and relies on the Audit Clause of the Data Processing Agreement with UGLE to ensure continued compliance.

2. Local Data (Non-HERMES/Sensitive):

- For data processed outside of HERMES (e.g., Almoner reports, local financial records), the Province and Lodges maintain traditional security:
 - Personal data held in physical format is stored in locked filing cabinets in secure locations.
 - Computer files containing personal details are password-protected.
 - Officers are strongly advised to resist the temptation to retain their own copies of HERMES data separately to prevent the use of inaccurate or unsecured information.

