



# PROVINCIAL GRAND LODGE OF CORNWALL

The following document provides a template for a **Legitimate Interests Assessment (LIA)** Record is updated below, with revisions to the **Necessity Test** and **Balancing Test** sections of the three assessed activities. These changes specifically address the introduction of the **HERMES** system as the centralised, systematic platform for data processing and sharing.

## LEGITIMATE INTERESTS ASSESSMENT (LIA) RECORD

|                  |                                    |              |   |
|------------------|------------------------------------|--------------|---|
| Assessment Date: | 11 December 2025                   | Review Date: | December 2026 (or upon major policy change) |
| Controller:      | Provincial Grand Lodge of Cornwall | DPO:         | Provincial Data Protection Officer          |

### LIA 1: Provincial Communication and General Administration

| Section                         | Question                         | Rationale for the Province's Interest   | Result              |
|---------------------------------|----------------------------------|---|---------------------|
| <b>Part A:<br/>Purpose Test</b> | What is the legitimate interest? | Effective administration of the Province, adherence to the Book of Constitutions, and the fulfilment of the core functions of a not-for-profit membership organisation. | Legitimate Interest |

| Section                           | Question                     | Rationale for Necessity   | Result    |
|-----------------------------------|------------------------------|---|-----------|
| <b>Part B:<br/>Necessity Test</b> | Is the processing necessary? | <p><b>Yes, the processing is highly necessary, and HERMES is the most effective and least intrusive mechanism.</b></p> <p>Processing data within the central <b>HERMES</b> platform is necessary to ensure:</p> <p><b>Accuracy:</b> All Lodges and the Province access a single, correct record of contact details in real-time. This prevents the use of outdated or inaccurate local records.</p> <p><b>Efficiency:</b> HERMES systematically handles administrative returns (e.g., Annual Returns, Post-Meeting Reports), making manual, fragmented processes obsolete and minimising administrative effort.</p> | Necessary |

| Section                           | Question   | Rationale for Balancing the Interests   | Result             |
|-----------------------------------|--|---|--------------------|
| <b>Part C:<br/>Balancing Test</b> | Do the members' rights override the Province's interest? | <b>No. The privacy impact is minimised by the security of the central system.</b> | Interest Overrides |





# PROVINCIAL GRAND LODGE OF CORNWALL

| Section | Question | Rationale for Balancing the Interests  | Result |
|---------|----------|--|--------|
|         |          | The risk to members is mitigated because the data is now centrally stored and protected within the <b>HERMES</b> system, which is secured by UGLE's professional <b>Technical and Organisational Measures (TOMs)</b> , as documented in the Data Processing Agreement. The security reliance is on a single, hardened system rather than fragmented local systems. |        |

| **Overall LIA Outcome | Processing is Lawful.** The Province's interest in maintaining effective and secure administration via HERMES overrides the minimal privacy impact, especially as the data is used for the member's benefit. |

---

## LIA 2: Masonic Disciplinary Sanctions Notification

| Section                     | Question                         | Rationale for the Province's Interest   | Result              |
|-----------------------------|----------------------------------|---|---------------------|
| <b>Part A: Purpose Test</b> | What is the legitimate interest? | Maintaining the integrity of the Craft, upholding the rules of the Book of Constitutions, and ensuring the safety of members by preventing the readmission of expelled/suspended individuals. | Legitimate Interest |

| Section                       | Question                     | Rationale for Necessity   | Result             |
|-------------------------------|------------------------------|---|--------------------|
| <b>Part B: Necessity Test</b> | Is the processing necessary? | <b>Yes, it is strictly necessary for compliance and integrity.</b><br><br>The ability to record and notify disciplinary actions (e.g., Rule 181 Exclusions) via the <b>HERMES</b> platform is essential. The system provides an <b>auditable, real-time mechanism</b> to update the central record, which is necessary to ensure all Masonic entities are immediately aware of the sanction status, replacing slower, less reliable manual methods. | Strictly Necessary |

| Section                       | Question   | Rationale for Balancing the Interests   | Result             |
|-------------------------------|--|---|--------------------|
| <b>Part C: Balancing Test</b> | Do the members' rights override the Province's interest? | <b>No. While the data is sensitive, the high public/governance interest overrides.</b><br><br>The processing only involves sharing the minimum data required (the sanction itself). The use of the secure <b>HERMES</b> system ensures the data is transmitted and stored with appropriate security safeguards, mitigating the risk of accidental disclosure, which would be higher with email or paper correspondence. | Interest Overrides |





# PROVINCIAL GRAND LODGE OF CORNWALL

| **Overall LIA Outcome | Processing is Lawful.** The high public interest in the good governance and safety of the Craft overrides the high privacy impact of processing disciplinary data, especially when done through a secure and systematic platform like HERMES. |

### LIA 3: Publication of the Provincial Year Book

| Section                      | Question   | Rationale for the Province's Interest  | Result                 |
|------------------------------|--|--|------------------------|
| Part B:<br>Necessity<br>Test | Is the processing necessary?                             | <b>No, not strictly necessary.</b> The Province could facilitate contact through less intrusive means (e.g., directing all enquiries through the Lodge Secretary, whose contact details are maintained in the secure HERMES system). | Not Strictly Necessary |
| Part C:<br>Balancing<br>Test | Do the members' rights override the Province's interest? | Yes, the risk of bulk data harvesting from an electronic Year Book, even if restricted, is too high and overrides the general interest in fraternity. The expectation of privacy for a member's contact details is high.             | Rights Override        |

| **Overall LIA Outcome | Legitimate Interests cannot be robustly relied upon.** The Province must rely on explicit, opt-in consent from each member for the publication of their details.

The HERMES system provides the up-to-date contact information necessary to obtain this explicit consent annually.

