



PROVINCIAL GRAND LODGE OF CORNWALL

Data Protection Policy — Province of Cornwall (Updated to DUAA 2025)

1. Scope and Compliance

This Data Protection Policy regulates how the Province of Cornwall processes and stores the personal data of its members, employees, officers, and volunteers. Its purpose is to ensure the Province complies with the UK GDPR, the Data Protection Act 2018, and the Book of Constitutions.

2. Purposes of Processing

As a membership organisation, the Province processes, retains, and shares personal data for the following purposes:

- **Effective Governance and Administration:** Including the maintenance of official records, processing financial returns, and issuing official communications (e.g., Provincial Summonses).
- **Fulfilment of Masonic Obligations:** As required by the Book of Constitutions, including the assessment of candidates, progression of degrees, and maintaining the register of members.
- **Masonic Disciplinary Processes:** Including the necessary processing and sharing of information relating to sanctions to maintain the integrity of the Craft.

The Province shall not collect or store personal data of members for any other purposes unless a lawful basis (Consent or Legitimate Interests) has been established and recorded via a **Legitimate Interests Assessment (LIA)**.

3. Roles and Responsibilities (HERMES Update)

Role	Responsibility	HERMES Impact
Province of Cornwall	Controller. Responsible for determining the purpose and means of processing member data, setting internal policy, and complying with Data Protection Law.	Remains the Controller of all data relating to its governance, but data is <i>stored and managed</i> centrally.
United Grand Lodge of England (UGLE)	Processor (for HERMES). UGLE provides the HERMES platform and technical infrastructure used by the Province. UGLE processes data on the Province's instructions , as documented in the Data Processing Agreement (DPA) Schedule .	The Province relies on the UGLE Processor to maintain the technical security, integrity, and availability of data held within the HERMES system.
Provincial Data Protection Officer (DPO)	Oversees compliance with data protection law, acts as the primary contact for data subjects, and is the focal point for internal breach reporting.	Monitors compliance with the DPA Schedule regarding UGLE's performance as a Processor.





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4. Principles of Data Management

Data Minimisation and Accuracy

- The Province shall only process personal data that is **adequate, relevant, and limited** to what is necessary for the stated purposes.
- The Province shall take all reasonable steps to ensure that the personal data it holds (either locally or on HERMES) is **accurate** and kept up to date.

Data Security

- **Local Records:** Any hard-copy files (e.g., Almoner reports, sensitive documents) must be kept in locked filing cabinets. Any digital files stored locally (outside of HERMES) must be password-protected.
- **Systemic Records (HERMES):** The Province relies on UGLE's technical and organisational measures within the HERMES platform to ensure the **confidentiality, integrity, and availability** of member data. Provincial Officers must adhere strictly to all UGLE security protocols (e.g., password policies, two-factor authentication) when accessing HERMES.

Accountability and Documentation

- The Province shall maintain an accurate **Record of Processing Activities (RoPA)** (UK GDPR Article 30) detailing what data is processed, why, where it is stored, and for how long.
- The Province shall maintain its annual registration with the Information Commissioner's Office (ICO).

5. Data Retention

Personal data shall only be retained for as long as is strictly necessary for the purposes for which it was collected.

- **Current Members:** Data will be retained throughout the member's tenure in the Province.
- **Resigned/Expelled/Excluded Members:** Data relating to membership status will be retained by the Province and UGLE for a minimum of 10 years to prevent improper re-application.
- **Historical Records:** Certain data (e.g., Lodge Minutes, Grand Lodge Certificates) may be retained indefinitely for archive and historical purposes as permitted by UK GDPR.

6. Reporting and Managing Breaches

- Actual or potential breaches of this policy, or of data protection law, shall be reported **immediately** to the Data Protection Officer (DPO).
- **Processor Breach:** If a breach occurs within the HERMES system, the DPO must rely on the UGLE **Processor** to notify the Province in accordance with the **DPA Schedule** (See Section 3).

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- The DPO shall follow the formal **Data Breach Incident Management Plan** to assess the risk, contain the incident, and report to the ICO (if required) within 72 hours of becoming aware.
- The DPO shall normally not report breaches to the ICO or affected member(s) without prior consultation with the Provincial Grand Master and Provincial Grand Secretary.

