



PROVINCIAL GRAND LODGE OF CORNWALL

This document, which outlines the lawful bases for processing member data, reflects the administrative and data-sharing changes introduced by the **HERMES** system.

The primary updates reflect that data administration and sharing are now **systematic and centralised** via the HERMES platform.

UPDATED LAWFUL BASES FOR PROCESSING ACTIVITIES

The legal justification for processing member data primarily relies on **Legitimate Interests** and **Contractual Obligations**, as detailed below.

Lawful Basis 1: Legitimate Interests (UK GDPR Article 6(1)(f))

Processing is lawful if it is necessary for the legitimate interests pursued by the Province or a third party, provided a Legitimate Interests Assessment (LIA) is performed. The core processing activities are updated as follows to incorporate HERMES:

Purpose for Processing	Lawful Basis Justification	Relevant Data Processed
Administration of Membership	Necessary for the effective internal administration and governance of the Province and its constituent Lodges (as a third party) ⁴ .	Name, contact details, date of birth, dates of degree/office progression, Lodge membership records. Processing is conducted via the central HERMES platform.
Provincial Communications	Necessary for communication with the Brethren regarding official Provincial business, events, announcements, and compliance matters.	Contact details (postal address, email, telephone). The accuracy of these details is maintained in HERMES.
Masonic Disciplinary Processes	Necessary for maintaining integrity, good governance, and upholding the rules of the Order as set out in the Book of Constitutions.	Name, address, disciplinary sanction, date of sanction, relevant Lodges/Chapters ⁷
Safeguarding & Welfare (Almoner)	Necessary to support members in distress or need (welfare support). This is a legitimate interest for not-for-profit organisations.	Limited health or financial data (special category data). Note: Highly sensitive Almoner data is discouraged from being stored in the central HERMES system.
Financial/Statutory Compliance	Necessary for managing the Province's finances, charity contributions, and fulfilling statutory requirements (e.g., HMRC).	Bank details (if applicable for payments/reimbursements), gift aid declarations, and financial transaction records.





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Purpose for Processing	Lawful Basis Justification	Relevant Data Processed
Sharing with UGLE and Lodges	Necessary to share membership data with the Grand Lodge and individual Lodges for registration, compliance, and administration, as they are separate but linked data controllers.	All core membership data. Sharing is systematic, real-time, and continuous via the HERMES platform, formalised under a Data Sharing Agreement (DSA).

Lawful Basis 2: Contractual Obligations (UK GDPR Article 6(1)(b))

Processing is lawful where it is necessary for the performance of a contract or quasi-contractual relationship with the data subject.

Purpose for Processing	Lawful Basis Justification	Relevant Data Processed
Managing the Membership Contract	A member's joining of a Lodge/Province constitutes a quasi-contractual relationship. Processing is necessary to uphold the reciprocal obligations of this relationship (e.g., providing benefits of membership, sending summonses for Lodge meetings, and collecting subscriptions).	Name, subscription status, HERMES-recorded attendance records , Lodge details. Attendance is mandatory and must be recorded in the Post-Meeting Report feature of HERMES.
Assessing Membership Applications (Pre-Contractual)	Processing candidate data, including making enquiries (e.g., Rule 158 checks), is necessary to decide on the application before entering into the contract of membership.	Full name, address, occupation, contact details, and application data. The process utilises the HERMES-generated Online Registration Form (ORF) and automated checks against UGLE's central database, replacing previous paper forms.

Other Relevant Legal Provisions

- **Processor Reliance:** For the operation of the HERMES platform itself (e.g., hosting, IT maintenance, security), the Province relies on UGLE as a **Data Processor**, which is governed by a dedicated **Data Processing Agreement (DPA) Schedule**.
- **Data (Use and Access) Act 2025 (DUAA):** This remains relevant as it introduces **Recognised Legitimate Interests** for security and internal administration, potentially streamlining LIA requirements for the use of the HERMES platform.

