

# **Privacy & Data Protection Policy**

This is the public privacy and data protection notice for all members of The Liberal Party's and public who use the Liberal Party's services and assets.

### 1. PURPOSE OF POLICY

The Liberal Party (registered as a political party with the Electoral Commission under registration PP54 and a registered data controller with the Information Commissioner's Office (ICO) under registration number A8865017) are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of and relationship with our followers, supporters, members, donors, subscribers, stakeholders, contractors, and all other interested parties; and in turn to provide relevant and timely information about the work that we do.

The purpose of this policy is to give you a clear explanation about how we collect and use the information we collect from you and to meet our duties of transparency.

We gather, store and use information concerning the protection of personal information, in accordance with the following applicable laws:

The Privacy and Electronic Communications (EC Directive) Regulations 2003 - General Data Protection Regulation 2016/679 (European Union regulation)

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Data Protection Act 2018

This policy provides information as required by Articles 13 and 14 GDPR.

This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- How we might use cookies to improve our website
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

### 2. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

Users have the right to request a copy of the information that we hold about them. If they would like a copy of some or all of your personal information, they can email or write to us – our contact details are provided on our website. We may make a small charge for this service. We want to make sure that personal information is accurate and up to date. Users can ask us to correct or remove information which they think is inaccurate.

By law you have the right to:

- Request access to your Personal Data.

This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it

- Request correction of the Personal Data that we hold about you.

This enables you to have any incomplete or inaccurate information we hold about you corrected

- Request erasure of your Personal Data.

This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below)

- Object to processing of your Personal Data.

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This right exists where we are relying on a Legitimate Interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes

### - Request the restriction of processing of your Personal Data

This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it

### - Request the transfer of your Personal Data

We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you

#### - Withdraw consent

This right only exists where we are relying on consent to process your Personal Data ("Consent Withdrawal"). If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our Site. We will advise you if this is the case at the time you withdraw your consent.

### 3. LEGAL BASIS FOR PROCESSING YOUR DATA

There are three bases under which we may process your data:

### - Contract purposes

If you enter into a contract with us, in order to perform this contract, we need to process and store your data

## Legitimate business interests

In certain situations, we collect and process your personal details for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing

### With your explicit consent

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

### 4. HOW WE USE YOUR DATA

We process data with the intention of using it primarily for the broad purpose of our political, campaigning and fundraising activities.

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The tables below illustrate how we commonly use your data and our justification and legal bases for doing so.

# 4.1. CAMPAIGNING & COMMUNICATING WITH YOU

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
Canvassing Political Opinions	Electors	Name, Address, Electoral Roll Number,	Public Task	Article 9(2)(g) GDPR – substantial public
		Telephone Number, Political Opinion,	(Democratic	interest – DPA 2018, Schedule 1, Part 2,
		Contact Details, Marketing	Engagement)	Paragraph 22 Political Parties.
		Preferences		
Communicating with you via hand-delivered	Electors, Members	Name, Address, Electoral Roll Number,	Public Task	
leaflets about our policies, campaigns,	/ Former Members,	Profiled Data	(Democratic	
events, fundraising appeals & opportunities	Donors, Volunteers		Engagement)	
to get involved with the party				
Communicating with you via post about our	Electors, Members	Name, Address, Electoral Roll Number,	Public Task	
policies, campaigns, events, fundraising	/ Former Members,	Profiled Data	(Democratic	
appeals & opportunities to get involved with	Donors, Volunteers		Engagement)	
the party				
Communicating with you via electronic	Electors, Donors,	Name, Address, Contact Details (email,	Consent	
message about our policies, campaigns,	Volunteers	phone, social media etc)		
events, fundraising appeals & opportunities				
to get involved with the party				

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Sending you surveys & processing your responses	Electors	Name, Address, Electoral Roll Number, Political Opinion, National & Local Issue Positions, Incidental Special Category data, Contact Details (email, phone, social media etc), Marketing Preferences	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.  Article 9(2)(a) GDPR - Explicit Consent for collection of incidental special category data
Conducting petitions & presenting the signatories to the specified recipient	Electors	Name, Postcode, Contact Details (email, phone, social media etc), Political Opinion, National & Local Issue Positions	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties
Conducting Online Surveys	Electors	Name, Address, Electoral Roll Number, Political Opinion, National & Local Issue Positions, Incidental Special Category data, Contact Details (email, phone, social media etc), Marketing Preferences	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.  Article 9(2)(a) GDPR - Explicit Consent for collection of incidental special category data
Showing you adverts via social media platforms	Electors, Members / Former Members, Donors, Volunteers	Email Address	Legitimate Interests Consent	
Creating custom audiences for advertising on Social Media Platforms using existing supporters' details, information from our cookies/pixels & using those audiences to create "lookalikes"	Electors, Members / Former Members, Donors, Volunteers, Supporters	Email Address, Address, Political Opinion	Legitimate Interests Consent	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.
Registering for a campaign event(s) organised by The Liberal Party administering the event	Electors, Members / Former Members, Supporters	Name, Address, Contact Details (email, phone, social media etc), Political Opinion	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.
Polling Day Activities – e.g. "Knocking up" on the doorstep or via phone & "Telling" at polling stations	Electors	Name, Address, Electoral Roll Number, Polling Day Activity	Public Task (Democratic Engagement)	

Signing up to Volunteer for the party & us sharing your details with the wider party  Maintaining & administering a database to store Electoral Register data, canvassing data, membership data, survey responses etc — including operating a test environment	Members, Donors, Electors, Volunteers, Candidates, Elected representatives, Supporters, Officers	Name, Address, Contact Details (email, phone, social media etc), volunteering preferences, Political Opinion  Name, Contact Details (address, email, phone, social media), Addresses, Political Opinion, Age, Voting History, Relationships, Electoral Roll Information, Issue Positions, Memberships, Donations, Survey Responses, User profile names, Hashed Passwords, IP addresses, User authentication, Usage data & usage history, Free text notes, Titles, Suffixes, Gender, First Language, Positions Held Location Information	Public Task (Democratic Engagement)  Public Task (Democratic Engagement)  Legitimate Interests  Legal Obligation (Compliance with Article 24 GDPR & S41 Political	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.  Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.  Article 9(2)(a) GDPR - Explicit Consent for collection of incidental special category data
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## 4.2. MEMBERSHIPS & DONATIONS

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
Processing your application for membership & administration of	Members	Name, Address, Political Affiliation, Contact Details (email, phone, social	Contract Legal Obligation (Compliance	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2,
your membership		media etc), Date of Birth, Payment Information	with Article 24 GDPR & S41 Political Parties, Elections & Referendums Act 2000	Paragraph 22 Political Parties.
Inviting you to renew your membership &/or re-join the party	Members / Former Members	Name, Contact Details (email, phone, social media etc), Address	Legitimate Interests	

Sharing your membership details with your local Liberal Association  Communicating with you via electronic message about your membership, our policies, campaigns, events, fundraising appeals & opportunities to get involved with the party	Members / Former Members	Name, Address, Political Affiliation, Contact Details (email, phone, social media etc), Date of Birth  Name, Address, Contact Details (email, phone, social media etc)	Contract	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.
Conducting petitions & presenting the signatories to the specified recipient	Electors	Name, Postcode, Contact Details (email, phone, social media etc), Political Opinion, National & Local Issue Positions	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties
Administering Membership Suspensions & Expulsions	Members / Former Members, Complainants, Witnesses,	Name, Details of Suspension/Expulsion, Contact Details, Address, Ethnicity, Religious or Philosophical Beliefs, Trade Union Membership, Health Data, Criminal Offence Data, Sex Life, Sexual Orientation, Political Opinion - incl Membership of a political party, Age, Social Media Activity (Public & Private), Personal Communications Data, Details of Complaint, Complaint Resolution, Witness Evidence	Public Interest (Compliance with the Equalities Act 2010)	Article 9(2)(g) "Substantial Public Interest" - DPA Schedule 1, Part 2, Paragraph 6 - "Statutory Etc & Government Purpose" - there is a substantial public interest to ensure that engagement with politics complies with the Equalities Act 2010 Article 9 GDPR - Schedule 1 DPA 2018; Schedule 1, Part 2 Paragraph 10 - Preventing or detecting unlawful acts Article 10 GDPR - meet a condition of Schedule 1 DPA 2018; Schedule 1, Part 2 Paragraph 10 - Preventing or detecting unlawful acts
Process appeals against expulsion and suspension by Party Members	Members / Former Members, Complainants, Witnesses,	Name, Contact Details, Address, Ethnicity, Religious or Philosophical Beliefs, Trade Union Membership, Health Data, Criminal Offence Data, Sex Life, Sexual Orientation, Political Opinion - incl Membership of a political	Legitimate Interests	rticle 9(2)(g) "Substantial Public Interest" - DPA Schedule 1, Part 2, Paragraph 6 - "Statutory Etc & Government Purpose" - there is a substantial public interest to ensure that engagement with politics complies with the Equalities Act 2010

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		party, Age, Social Media Activity (Public & Private), Personal Communications Data, Details of Complaint, Complaint Resolution, Witness Evidence	Public Interest (Compliance with the Equalities Act 2010)	Article 9 GDPR - Schedule 1 DPA 2018; Schedule 1, Part 2 Paragraph 10 - Preventing or detecting unlawful acts Article 10 GDPR - meet a condition of Schedule 1 DPA 2018; Schedule 1, Part 2 Paragraph 10 - Preventing or detecting unlawful acts
Processing your donation or loan & checking your eligibility to donate or loan sums of more than £500	Donors	Name, Address, Electoral Roll Number, Contact Details (email, phone, social media etc), Payment Information, Political Affiliation	Public Task (Democratic Engagement)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.
			Legal Obligation – Compliance with Parts IV & 4A Political Parties, Elections & Referendums Act 2000	
Reporting donations & loans to the Electoral Commission	Donors	Name, Address, Donation Amount, Political Affiliation	Legal Obligation – Compliance with Parts IV & 4A Political Parties, Elections & Referendums Act 2000	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 6 Statutory & Government Purposes
Maintaining & administering a fundraising database	Members / Former Members, Donors	Name, Address, Political Opinion, Contact Details (email, phone, social media etc), Donation History, Biographical Information, Occupation, Correspondence, Family Connections, Marketing Preferences, Date of Birth	Legitimate Interests  Legal Obligation — Compliance with S41 Political Parties, Elections & Referendums Act 2000	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.

# 4.3. RESEARCH, DUE DILIGENCE & MEDIA ORGANISATIONS

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
	Elected	Name, Publicly available information (e.g.	Legitimate	Article 9(2)(e) GDPR – Personal data manifestly made
	Representatives,	occupation, social media posts, directorships, media	Interests	public by the data subject

Political research using publicly available sources	Candidates, Members, Activists, Donors	history, property and financial holdings etc), Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offences, etc)		Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 11 Protecting the public against dishonesty etc.
Due diligence of prospective members, potential appointees, donors & volunteers using publicly available sources	Members, Donors, Supporters, Volunteers, Potential Appointees	Name, Publicly available information (e.g. occupation, social media posts, directorships, media history, property and financial holdings etc), Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offences, etc)	Legitimate Interests	Article 9(2)(d) GDPR – processing is carried out in the course of its legitimate activities with appropriate safeguards  Article 9(2)(e) GDPR – Personal data manifestly made public by the data subject  Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 11 Protecting the public against dishonesty etc.
Communication with media organisations	Elected Representatives, Candidates,	Name, Publicly available information (e.g. occupation, social media posts, directorships, media history, property & financial holdings etc),	Legitimate Interests	Article 9(2)(e) GDPR – Personal data manifestly made public by the data subject

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Members, Activists, Donors	Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offencesc)	Article 9(2)(g) GDPR – substantial public interest – DPA 2018, Schedule 1, Part 2, Paragraph 11 Protecting the public against dishonesty etc.

## **4.4. VOLUNTEERS & OUTREACH**

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
Providing advice, training &	Association Officers,	Name, Contact Details (address, email, phone,	Legitimate	Article 9(2)(g) GDPR – substantial public
support on matters relating to	Members, Activists,	social media etc), Correspondence	Interests	interest – DPA 2018, Schedule 1, Part 2,
the Constitution & Volunteers	Volunteers			Paragraph 22 Political Parties.
Communication with Party	Party Officers, Members	Name, Contact Details (email, phone, social	Legitimate	Article 9(2)(g) GDPR – substantial public
Officers at Board, Regional and		media etc), Correspondence, Political Opinion,	Interests	interest – DPA 2018, Schedule 1, Part 2,
Association Level and Party		Incidental Special Category Data, Volunteering		Paragraph 22 Political Parties.
Members		Interests, Events Interests		
Providing advice and support	Association Officers,	Name, Position, Contact Details (email, phone,	Legitimate	Article 9(2)(g) GDPR – substantial public
on the selection of local	Candidates	social media etc), Correspondence, Candidate	Interests	interest – DPA 2018, Schedule 1, Part 2,
government candidates		CV's, Political Opinion		Paragraph 22 Political Parties.
Providing advice and support	Association Officers,	Name, Details of Disciplinary Case,	Legitimate	
on local disciplinary issues	Members, Activists	Correspondence	Interests	
Managing Young Liberal	Members, Students	Name, Contact Details (email, phone, social	Public Task	Article 9(2)(g) GDPR – substantial public
Groups		media etc), Occupation, Region of Residence,	(Democratic	interest – DPA 2018, Schedule 1, Part 2,
		Political Opinion, Correspondence	Engagement)	Paragraph 22 Political Parties.

Managing Affiliated Groups	Members	Name, Contact Details (email, phone, social	Public Task	Article 9(2)(g) GDPR – substantial public
		media etc), Occupation, Region of Residence,	(Democratic	interest – DPA 2018, Schedule 1, Part 2,
		Political Opinion, Correspondence	Engagement)	Paragraph 22 Political Parties.
Managing External	Members, Community	Name, Contact Details (email, phone, social	Public Task	Article 9(2)(g) GDPR – substantial public
Relationships	Stakeholders, Candidates,	media etc), Occupation, Region of Residence,	(Democratic	interest – DPA 2018, Schedule 1, Part 2,
	Elected Representatives,	Political Opinion, Correspondence	Engagement)	Paragraph 22 Political Parties.
	Business Owners			
Providing support to Local	Elected Representatives	Name, Contact Details (email, phone, social	Public Task	Article 9(2)(g) GDPR – substantial public
Councillors		media etc), Occupation, Region of Residence,	(Democratic	interest – DPA 2018, Schedule 1, Part 2,
		Political Opinion, Correspondence	Engagement)	Paragraph 22 Political Parties.

## 4.5. FINANCE

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
Processing Payments to Suppliers	Suppliers Staff	Name, Contact Details, Job Title	Contract	
Processing Payments from donors,	Donors, Members,	Name, Address, Political Affiliation,	Contract	Article 9(2)(g) GDPR – substantial
members & supporters & keeping a record for accounting purposes	Supporters	Contact Details (email, phone, social media etc), Date of Birth, Payment Information	Legitimate Interests	public interest – DPA 2018, Schedule 1, Part 2, Paragraph 22 Political Parties.
Preparing & Reporting Election Spending Returns to the Electoral Commission	Suppliers, Association Officers, Candidates, Election Agents, Volunteers	Name, Address, Expense Details, Job Title, Correspondence (for preparing returns)	Legal Obligation (Compliance with Part V Political Parties, Elections and Referendums Act 2000)	

# 4.6. MARKET RESEARCH & OPINION POLLING

Purpose	Data Subject	Typical Data Categories	Legal Basis	Special Category Legal Basis
Performing Market Research	Electors	Name, Address, Telephone Number, Constituency,	Public Task	Article 9(2)(g) GDPR – substantial public interest
to get a sense of political		Gender, Age, Profiled data, National and local issue	(Democratic	– DPA 2018, Schedule 1, Part 2, Paragraph 22
opinion locally &/or across the		positions, Political Opinion	Engagement)	Political Parties.
UK				

Conducting Opinion Polling to	Electors	Name, Address, Telephone Number, Constituency,	Public Task	Article 9(2)(g) GDPR – substantial public interest
get a sense of political opinion		Gender, Age, Profiled data, National and local issue	(Democratic	– DPA 2018, Schedule 1, Part 2, Paragraph 22
locally &/or across the UK		positions, Political Opinion	Engagement)	Political Parties.

### 5. MARKETING COMMUNICATIONS

Users can choose to subscribe to The Liberal Party mailing list to receive news about our policies, campaigns, candidates, fundraising activities and related events. By providing us with your contact details, you are giving us explicit consent to contact you. If you subscribe to our mailing list concerning a particular event or subject, then we use our legitimate organisational interest as the legal basis for any continued communications by email.

We use MailChimp as our marketing automation platform, using a best-practice "double opt-in" process. By subscribing to our mailing list users acknowledge that the information provided will be transferred to MailChimp for processing in accordance with their <u>privacy policy and terms</u>. MailChimp collects and stores mailing list subscriptions in order to allow us to create and use distribution lists, send marketing email campaigns, and place online advertisements.

Users can unsubscribe from the mailing list and future communications by following the links at the bottom of every email we send out via MailChimp. If we have contacted you in the past and you have explicitly told us that you don't want to receive marketing communications from us, then we will keep your name and address on a list of people we don't contact. If you would prefer for your information to be deleted from that list, you can let us know using the contact details on our website.

We may also use your postal address and/or phone number if you have provided these to us for us to keep in touch with you. We will always get explicit consent from you to use those details at the time that you provide those details to us.

## 6. EMAILS

Emails that we send or receive may be retained as a record of contact and email addresses stored for future use in accordance with our record retention schedule. If we need to email sensitive or confidential information to you, we will perform checks to verify the correct email address and may take additional security measures.

# 7. OTHER PROCESSING ACTIVITIES

We also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible
   We may analyse data we hold about you in order to identify and prevent fraud
- In order to improve our website, we may analyse information about how you use it and the content and ads that you interact with

• We may use profiling techniques or third-party wealth screening and insight companies to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy.

### **8. THIRD PARTIES**

The Liberal Party will not pass personal data to third parties for marketing, sales or any other commercial purposes without prior explicit consent.

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and on our instructions. In these cases, we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies)

We may process personal information using web services hosted outside the European Economic Area, but only where a data processing agreement is in place that complies with obligations equivalent to those of the Data Protection Act.

In addition to the Personal Data that we collect directly from you, we may also collect certain of your Personal Data from third party sources such as credit reference agencies, social media sites and analytics providers for identity verification, behavioural and technical data which may or may not already be publicly available.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect some of your data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every site you visit.

### 9. USE OF COOKIES

Cookies are small text files that are automatically placed onto your computer device by some websites that you visit. They are widely used to allow a website to function as well as to provide website operators with information on how the site is being used. You can learn more about all the cookies we use on our website below.

### 9.1. The Liberal Party uses cookies to:

- ensure the website works
  - monitor website performance and help us make improvements in the future
- continuously improve our website for you
- improve the speed/security of the site
- remember your settings during and between visits
- allow you to share pages with social networks like Facebook

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- tailor our marketing and use tools such as Google AdWords to communicate more effectively through web advertising
- make our marketing more efficient

#### 9.2. We do not use cookies to:

- collect any personally identifiable information
- collect any sensitive information
- pass personally identifiable data to third parties

#### 9.3. Our own cookies

We use cookies to make our website work, including remembering popup options and compiling visitor statistics. There is no way to prevent these cookies being set other than to not use our site. Cookies set by <a href="http://www.liberal.org.uk/">http://www.liberal.org.uk/</a>

Name	Purpose	Expires	Company
_ga	Analytics	2 years	Google
_gid	Analytics	24 hours	Google
_gat	Analytics	1 minute	Google

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at, etc. This helps us to continuously improve our website. These "analytics" programs also tell us, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before helping us to better understand our audience

### 9.4. Third party cookies

Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube or Vimeo video and SoundCloud audio file. While we have made an effort to minimise their use, some third party services embedded within this website set their own cookies. These are known as third party cookies because they are not set by our website. We have no control over the cookies that are set by third party services. Disabling these cookies will likely break the functions offered by these third parties

#### 9.5. Social Media website cookies

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So you can easily "Like" or share our content on social networks like Facebook and Twitter we have included sharing buttons on our site. Cookies are set by the sites below. The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

- Facebook https://en-gb.facebook.com/business/gdpr
- Twitter https://twitter.com/en/privacy

### 9.6. Advertising cookies

Cookies are widely used in online advertising. Neither us, advertisers or our advertising partners can gain personally identifiable information from these cookies. We only work with advertising partners who work to accepted privacy standards such as <a href="http://www.youronlinechoices.com/goodpractice">http://www.youronlinechoices.com/goodpractice</a>. You can opt out of almost all advertising cookies here.

### 9.7. Granting us permission to use cookies

If the settings on the software you are using to view our website (your browser) are adjusted to accept cookies, and you continue use of our website; then we take this to mean that you are fine with the use of cookies on our site. Should you wish to remove or not use cookies, how you can do so is detailed below.

### 9.8. Managing cookies

It is easy to manage cookies by adjusting your browser settings. For more information and how to opt out, visit any of the following sites:

## www.allaboutcookies.org www.aboutcookies.org

https://ico.org.uk/your-data-matters/online/cookies/ https://www.youronlinechoices.com/

## 9.9. Opting out of Google Analytics

To opt out of being tracked by Google Analytics across our website please get the Google Analytics Op-out Browser add-on: https://tools.google.com/dlpage/gaoptout

### 10. MAINTAINING YOUR PERSONAL INFORMATION

We retain your information in accordance with The Liberal Party Data Retention Policy. We constantly review the data that we hold and regularly consider its relevance and our need to hold onto it. We use several factors to determine our retention periods. Factors we take into consideration are:

- Retention periods as required by law for example, the Liberal Party is under a statutory duty to retain financial information for a period of 6 years The purpose for which the data was provided or obtained
- Our documented business requirement for holding onto your data

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- Whether holding onto your data will infringe your rights over your data
- · Legal and regulatory obligations that may require reference to your data

If there are aspects of your record that are inaccurate or that you would like to remove or if you require more detailed information on how long your data will be kept for please contact our Data Protection Officer.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

### 11. TRANSFERRING YOUR DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA

Some of our service providers may be located outside of the European Economic Area (EEA) and therefore it may be necessary to transfer your personal data outside of the EEA. Where we do transfer your data outside of the EEA we will make sure that it is protected in the same way as if the data was inside the EEA.

We will use one of the following appropriate safeguards to ensure this:

- Where the European Commission has issued an adequacy decision determining that a non-EEA country or organisation ensures an adequate level of data protection
- A contract is put in place with the recipient of the data obliging them to protect the data to the same standards as the UK and the EEA

If we are unable to rely on one of the appropriate safeguards when transferring data outside the EEA, we may rely on a derogation for specific situations under Article 49 GDPR in order to transfer your data outside of the EEA. This may be necessary for example to fulfil a contract that we have made with your or if you give us permission to do so.

### 12. HOW WE KEEP YOUR PERSONAL DATA SECURE

We limit access to your Personal Data to those Party Officers who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

We have procedures to deal with any actual or suspected Personal Data breach. In the event of any such breach, we have systems in place to work with applicable regulators.

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