



## PROVINCIAL GRAND LODGE OF SOMERSET

### Data Protection and the retention of personal data by the Provincial Grand Lodge of Somerset

#### A General Overview

The European Union's Data Protection Regulation (the "GDPR") and enactment within UK Law governs the collection, recording, storage, use and disclosure of personal data, whether such data is held electronically or in manual form. The regulations define sensitive personal information, which is highly unlikely to be received by the Provincial Grand Lodge of Somerset, however the Province considers the following documents as sensitive as they may contain personal data: those related to the office of Almoner and Discipline papers. The following guidance is highlighted to all Provincial Officers upon appointment to assist with how retention of personal data should be considered.

#### Retention of documents containing personal data regarded as sensitive by Province

Type of document	How used	By whom in addition to PGM when required	Where and how held	Where published	Recommended retention period and destruction
Almoner – Joint Application Form	Charity Application	Almoner	Almoner (Electronic external drive)	Unpublished	6 months from application (GC DPG January 2013) <i>(Shred/Burn or permanent deletion of electronic files)</i>
Almoner – Fund Review Form	Charity Application	Almoner	Almoner (Electronic external drive)	Unpublished	6 months from application (GC DPG January 2013) <i>(Shred/Burn or permanent deletion of electronic files)</i>
Discipline Papers	Discipline matters	Registrar, DPGM, Panel Members, Secretary	Electronic secure server whilst a live case Hardcopy locked cabinet at home, work and Nailsea MH secure storage	Unpublished	10 years (Masonic Discipline Guidance – September 2006 para. 306) <i>(Shred/Burn or permanent deletion of electronic files)</i>



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### Retention of documents containing personal data

Type of document	How used	By whom in addition to PGM and Executive when required	Where and how held	Where published	Recommended retention period and destruction
Non-Member Registration Form	Non-member Registration and mailing list generation	Almoner, Secretary, SMFA Co-ordinator	Secretary, Compass Editor (Electronic external drive)	Printers for Compass circulation <i>(See note re third party distribution)</i>	Length of non-member affiliation  <i>(Shred/Burn or permanent deletion of electronic files)</i>
Installation Reports (to include lodge and member self-assessment submissions and collar meeting records)	State of the lodge and promotion recommendation	Visiting Officers	Destroyed following submission to PGM	Unpublished	Confidential historical paper archive: PGM Only – one hardcopy. Electronic copy access to DPGM, AsstPGM and Collar data processor. Last three years records held on secure cloud. <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Fraternal Visit Reports	State of the lodge	Visiting Executive member	Dropbox for future Executive information	Dropbox for future Executive information	2 years Executive Only – one hardcopy and electronic external drive <i>(Shred/Burn or permanent deletion of electronic files)</i>



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Type of document	How used	By whom in addition to PGM and Executive when required	Where and how held	Where published	Recommended retention period and destruction
Provincial Officer membership details	Generate Provincial Management Team contact detail	Provincial Management Team	Provincial Team  Hard copy at home	Provincial Management Team. Provincial Handbook	1 year  <i>(Shred/Burn)</i>
			Provincial Team  Electronic copy at home <i>Not to be distributed further</i>	Provincial Management Team. Heads of other Orders	1 year  <i>NB. Not to be distributed further</i>
Key Lodge Officer membership details	Generate Lodge Officer contact detail by Office	Key Provincial lead Officers	Provincial Team  Hard copy at home	Provincial Management Team. Provincial Handbook	1 year  <i>(Shred/Burn)</i>
			Provincial Team  Electronic copy at home <i>Not to be distributed further</i>	Provincial Executive Team. Heads of other Orders	1 year  <i>NB. Not to be distributed further</i>
Provincial Annual Return for dues	Generate Annual Lodge Return for Provincial Dues	Treasurer, Secretary, Assistant Registrar, Assistant Secretary	Electronic and hardcopy	Lodge secretaries, the final page being an invoice without personal data therein	Treasurer to retain final page invoice only for 6 years. Pages with personal data to be destroyed once any Adelphi record has been amended. <i>(Shred/Burn or permanent deletion of electronic files)</i>



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Type of document	How used	By whom in addition to PGM and Executive when required	Where and how held	Where published	Recommended retention period and destruction
UGLE Annual Return for dues	Generate Annual Lodge Return for UGLE Dues	Lodge secretaries	Electronic and hardcopy	Lodge secretaries	Secretary, Assistant Registrar/Secretary to forward to UGLE if returned to Province without copy being retained for 2 years <i>(Shred/Burn or permanent deletion of electronic files)</i>
Lodge Summons	Inform Visiting Officers	Visiting Officers	Dropbox for Visiting Officer information	Dropbox for Visiting Officer information	1 year <i>(Permanent deletion of electronic files)</i>
Festival Contributions	Inform Visiting Officers, Treasurer, Assistant Treasurer, Charity Steward and Visiting Officers	Treasurer, Assistant Treasurer, Charity Steward and Visiting Officers	Electronic and hardcopy by Treasurer, Assistant Treasurer and Charity Steward. Dropbox for Visiting Officer. Information in generic form with no personal data.	Personal Data unpublished  Dropbox for Visiting Officer information	Treasurer, Assistant Treasurer and Charity Steward – hardcopy to include previous Festival Summary. Electronic Copy for festival period with personal contribution detail for duration.  <i>(Shred/Burn or permanent deletion of electronic files)</i>
Lodge Membership Profiles (If individual personal data is identified)	Inform Visiting Officers	Visiting Officers, Information/DP Officer	Adelphi	Dropbox for Visiting Officer information	6 months  <i>(Shred/Burn or permanent deletion of electronic files)</i>



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Type of document	How used	By whom in addition to PGM and Executive when required	Where and how held	Where published	Recommended retention period and destruction
Lodge Member Details (If individual personal data is identified)	Inform Visiting Officers	Visiting Officers, Information/DP Officer	Adelphi	Dropbox for Visiting Officer information	6 months <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Form SOM2	Lodge meeting record, in particular change of member address detail	Asst Registrar, Secretary, Asst Secretary	Electronic and hardcopy	Asst Registrar, Secretary, Asst Secretary	Up to 6 months or until Adelphi record updated <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Form SOM3	Installation Return	Asst Registrar, Secretary, Asst Secretary, Key lead Provincial Officer	Electronic and hardcopy	Asst Registrar, Secretary, Asst Secretary, Key lead Provincial Officer	Up to 2 years or until Handbook generated and published <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Form SOM4	Death of a member	Asst Registrar, Secretary, Asst Secretary (PGM)	Electronic and hardcopy	Asst Registrar, Secretary, Asst Secretary (PGM)	Up to 6 months or until Adelphi record updated <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Form SOM6	Resignation, Cessation, Exclusion of a member	Asst Registrar, Secretary, Asst Secretary (Retrieval Team lead)	Electronic and hardcopy Retrieval Team: Dropbox	Asst Registrar, Secretary, Asst Secretary (Retrieval Team lead)	2 years (Those returned where a member may rejoin – retain in Dropbox until review at that time) <i>(Shred/Burn or permanent deletion of electronic files)</i>



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Type of document	How used	By whom in addition to PGM and Executive when required	Where and how held	Where published	Recommended retention period and destruction
LP & A5 Application Form	Request a GLCert from UGLE	Asst Registrar	Electronic and hardcopy	UGLE Registration	Up to 6 months or until Adelphi record confirms issue <i>(Shred/Burn or permanent deletion of electronic files)</i>
Membership Registration (UGLE Form P)	Request UGLE member registration	Asst Registrar	Electronic and hardcopy	UGLE Registration	Up to 6 months <i>(Shred/Burn or permanent deletion of electronic files)</i>
On-line membership enquiry forms	Consider new members	Secretary, Assistant Mentors	Electronic	Lodge Secretaries	Up to 1 year or until Adelphi record confirms joining <i>(Shred/Burn or permanent deletion of electronic files)</i>
Membership Transfer to/from other Province form	Facilitate introduction across Provinces	Secretary, Retrieval Team lead	Electronic	Lodge Secretaries	Up to 1 year or until Adelphi record confirms joining <i>(Shred/Burn or permanent deletion of electronic files)</i>
Provincial Grand Lodge Meeting and Executive Meeting Minutes, (if individual personal data is identified)	Management of the Province and record for historical record	Secretary	Electronic and hardcopy	PGL Annual Meeting – historical record for all members Executive Meeting – confidential management record	Historical paper archive: PGL Minute Book – retained indefinitely. Confidential historical paper archive: PGL Executive Minutes. Electronic Executive Meeting minutes held for previous 3 years. <i>(Shred/Burn or permanent deletion of electronic files)</i>



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## DATA PROTECTION AGREEMENT WITH DATA PROCESSOR

This Agreement is made the \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_ between (1) the Provincial Grand Lodge of Somerset, “PGLS” and (2) \_\_\_\_\_ [Insert name of company, co. number and address] (‘the Data Processor’).

WHEREBY IT IS AGREED as follows:

- 1) The Data Processor undertakes to comply at all times with the European Union’s Data Protection Regulation (the “GDPR”) and enactment within UK Law to the extent that it processes any personal data as defined in the GDPR.
- 2) In particular, but without limitation, the Data Processor shall: a) only carry out processing of the Data in accordance with the instructions of PGLS; b) keep the Data strictly confidential and not disclose it to any third party without the prior written consent of PGLS; c) maintain strict confidentiality of the Data and only disclose the Data to or allow access to the Data to those of its employees (or agents or sub-contractors) who are familiar with data protection requirements and whose use of personal data relates to their job or function; d) only use the Data for the specific purpose(s) authorised in writing by PGLS; e) assist PGLS with all information requests received from data subjects.
- 3) The Data Processor warrants that it has in place, and undertakes to maintain, appropriate operational, organisational and technical processes and measures to safeguard against any accidental, unauthorised or unlawful access or processing, loss, destruction, theft, damage, use or disclosure of the Data and adequate security programmes and procedures to ensure that unauthorised persons do not have access to the Data or to any equipment used to process the Data. In addition, the Data Processor will provide to PGLS any assurance in respect of the security of the Data processed by the Data Processor as may be reasonably required by PGLS to comply with its obligations under the Act.
- 4) The Data Processor (or its agents or sub-contractors) shall acquire no rights in any of the Data and shall only be entitled to process it in accordance with its obligations referred to in this Agreement. On demand, the Data Processor shall immediately cease to use the Data and arrange for its safe return or destruction as shall be agreed with PGLS.
- 5) The Data Processor indemnifies PGLS against any actions, costs, liabilities, losses, damages and expenses which PGLS may suffer or incur as a result of any breach by the Data Processor of the terms of this agreement.

On behalf of Data Processor

Signed:

Name:

Position:

Date:

Organisation:

On behalf of Data Controller

Signed:

Name:

Position:

Date:

Organisation: Provincial Grand Lodge of Somerset

Updated: 11<sup>th</sup> February 2018