



 **GDPR_**

Profiling and Automated Decision-Making

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Profiling and automated decision-making – what is it?

The EU General Data Protection Regulation includes certain provisions around how personal data can be used for:

- **Profiling** – where personal data is processed to evaluate certain things about an individual
- **Automated individual decision-making** – where a decision is made based on your personal data which is done solely by automated means

Why the Labour Party uses profiling

Data profiling is used by the Labour Party to make predictions for individual electors based on data we hold for a variety of different reasons, and uses data from a variety of sources. This data profiling may constitute automated individual decision-making in some cases – for example, whether or not you receive a particular piece of direct mail – but this does *not* produce any legal effects or similarly significant effects on the individual.

The Labour Party carries out profiling for a variety of reasons:

- To contact you to canvass your political support and ascertain your voting intention, encourage you to vote, or register for a postal vote;
- To manage the internal governance of the Labour Party and our membership database;
- To communicate with you about our policies, campaigns, events and opportunities to get involved with the party;
- To understand what issues are most likely to be relevant to you and your area;
- To decide to whom we should send our campaign materials and messages;
- To choose which messages and content we put on the materials we send to you, or show you on social media;
- To advertise to you on social media;
- To allow us to estimate which way you might vote in elections and referendums, and how likely you are to vote at all;
- To estimate your political attitudes;
- To help us understand in which areas, at which times of day, and with which people we should focus our campaigning efforts;

- To inform the development of our policy position for future elections and referendums at every level.
- To identify individuals that may have the capacity to financially support the Labour party at a higher level than they currently do, and to ensure that fundraising communications are tailored to an appropriate audience.

How the Labour Party obtained your personal data

The data sources used in our profiling include:

- Full electoral register
- Membership and supporter data
- Demographic data about individuals from our commercial supplier – this data may also be profiled
- Data on political opinions we have collected from individuals on the doorstep, phone or other methods
- Marked Register data (the record of whether or not people on the electoral register voted at a given election, which is available for political parties to purchase)
- Anonymised polling or survey data
- Publicly available data from areas such as census data

We will only ever use the minimum amount of data needed to create these profiles and we delete this data after a maximum of seven years.

Examples of what profiling looks like

The profiling the Labour Party does, which helps us to fulfil the purposes described above, includes:

- Predicting how likely you are to support the Labour Party or other political parties
- Predicting how likely you are to vote for a particular side in different hypothetical referenda
- Predicting how likely you are to vote in different types of elections
- Predicting how likely you are to be interested in a range of different issues
- Predicting how likely you are to answer the door or pick up the phone at particular times of day
- Predicting how likely you are to switch your support between a variety of political parties
- Predicting where you are likely to be positioned on a scale of political attitudes

This profiling typically includes the assignment of a 'score' to each elector, but sometimes we may also produce a 'rank' and/or 'decile' for each elector indicating how they compare to other electors in their constituency, ward or other geography.

How we legally use your personal data

Our legal basis for profiling is a mixture of both Legitimate Interests (GDPR Article 6 (f)) and Public Task (GDPR Article 6(1)(e)) in order to engage with voters and send them messages which they are likely to be interested in. This forms a part of the democratic process, of which political party campaigning plays an important role.

How the Labour Party protects your personal data

We always ensure that we have assessed any risk to you and your data in our detailed Data Protection Impact Assessments, and we regularly review these to ensure they remain relevant and up to date.

Wherever possible, the Labour Party will always seek to make you aware of any new profiling activities that include your personal data, unless our assessment

demonstrates that this may involve disproportionate effort, or would prove to be impossible. In such a case, this privacy notice (and the wider privacy notice on our website) will be updated to include any new processing activities, and we aim to include details of this notice on every piece of Labour Party correspondences.

Once we no longer need to use your personal data, we always ensure it is deleted and we have internal retention periods that help us ensure this happens.

Your rights around profiling

We always want to ensure you have flexibility about how your data is used, so you can opt out of profiling at any time. You can also choose to submit a Subject Access Request (“SAR”) to see the data we hold about you from profiling, as well as any wider personal data we hold for you. Your full information rights are listed in our wider privacy notice, however you can make the two requests mentioned above using the following links:

[I want to opt out of profiling](#)

[I want to make a Subject Access Request](#)

More information about profiling

If you would like further information on how your personal data is used to develop profiles, please contact us using dataprotection@labour.org.uk

You can also view our wider Privacy Notice [here](#) for information about other ways the Labour Party might use your personal data.

How to raise a concern

If you have a concern that cannot be resolved through discussion with us, these can also be raised with the Information Commissioner’s Office. [The contact information for the ICO is as follows:](#)

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

Different formats of the Profiling Notice

The information provided within this privacy notice can be made available in different formats including in printed form, different languages and approaches that meet the needs of the visually and hearing impaired.

Should you require this information in a different format, please contact the Data Protection Officer via dataprotection@labour.org.uk

Changes to the Profiling Notice

This Privacy Notice will be reviewed annually or sooner, should any new types of processing be identified, or changes to current data protection legislation mean changes are required. Any changes we may make to our privacy notice in the future will be posted on this page and, so please check from time to time.

Contact Us

If you have any wider questions about this Profiling Notice, the Labour Party's Data Controller and Data Protection Officer can be contacted directly by emailing dataprotection@labour.org.uk or writing to:

Data Protection

Governance & Legal Unit

Labour Party

Southside

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V2

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