

#### Overview

Democracy Counts hold ISO9001, ISO27001/27017, Cyber Essentials Plus and ISO22301, all of which assist us in our approach to compliance. Our Suppliers (for data hosting and printing) meet our standards and are also ISO27001/27017 accredited.

# **Your Agreement with Us**

You are the Data Controller and, together, we ensure all aspects of GDPR are addressed in our formal contractual agreements.

## **Data Sharing**

We use anonymised data by default, as we generally do not need live data to replicate Client Care issues. Should this be necessary, our Client Care team will be required to ask the Client Care Manager for permission to take a live data backup and records of the back-up, permission and purpose will be recorded. A report can be made available to you on request.

#### **Data Audit**

Elector8 includes a feature called Data Protection Audit, which has been in place for more than 15 years and means that sensitive information such as Nino, Bank Details, Anonymous Electors, DoB's for Children have a "Data Protection" record of when a User, with permissions, reveals details. It can be found via System > Data Protection Audit.

## **Poll Card & Absent Voting Files**

These extracts contain a DOB, which Clients have found useful for checking purposes. We give you an option to produce this version of the extract but "standard" extracts that you share with your Printers, will have the DOB removed.

## Date of birth of Children

We have extended the masking of the DOB with an \* (asterisk) for anyone below 16 and so exceed the protection of Children records under GDPR. If the date of birth of a child is then revealed, this will write a data protection audit record that can be searched to report on any User who has viewed such data.

## **ElectorReg (Online HEF Service)**

Options via Wizard > Canvass Extract Wizard regarding how you present Children (younger than 16 years) on the ElectorReg Website, giving you definite control.

# **Privacy Policy / Website Terms and Conditions**

Privacy policy pages on our Citizen-facing websites reference our role as Data Processor, to assure

them that we do not use the information for anything other than our legitimate business interest of supporting the ERO / RO at the local authority and make no other use of this data.

## **Channel Preference Opt Out**

The "Preferences" tab that is visible on the Elector Details screen, allows you to record if a Citizen withdraws consent, for example, from sending email. This will be regarded by the bulk send wizard and will exclude these Citizens. Naturally you could remove the email address as an immediate measure, but this additional detail will record a history item for the change and then ignore the echannels.

Electors & Registers > Opt Out, displays opt outs of the edited register, with a separate tab for Electors who have withdrawn their consent to use e-channels.

# **Citizen Privacy Management**

GDPR tries to support the Data Subjects right to remove their consent as easily as they give it, or create a Subject Access Request (SAR) for the information you hold on the subject. As much of the information is provided via the Government Digital Service (GDS), we have created an E-Form for this purpose. This means each authority has a unique URL that can be made available to your communications template, allowing you to add a "privacy setting/opt out option" to your emails. The result will be shown in Electors & Registers > Manage E-Forms and once you process them, this will create a new Person of Interest Record (for SAR) or update the Citizens communications preference. You will have the ability to adjust the wording in the Elector8 Management Portal, www.elector8.co.uk

#### Elector8Lite

Elector8 Administrator Users can control what is possible in Elector8Lite. Not all are strictly related to GDPR, but are mentioned here for completeness:

- User creation from Elector8 (rather than IIS) meaning this becomes a business rather than a technical function.
- Ability to hide/show contact details and restrict their update
- Ability to restrict person searches
- Ability to create a personal landing page to warn Users of Elector8Lite of your data standards in relation to the electoral registers
- Ability to hide/show DOB's
- Ability to hide/show non-verified Electors

We welcome your feedback and thank you for your continued support.

Simon Verdon

CEO

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