



# THE GRAND LODGE OF MARK MASTER MASONS

of England and Wales and its Districts and Lodges Overseas

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## **To: Members of All Orders in England and Wales and EU member states**

### **GENERAL DATA PROTECTION REGULATIONS (GDPR) – AN UPDATE**

#### **Background**

You will be aware from media reports and undoubtedly from having received many emails from organisations requesting your continued consent to be contacted in future, of the implementation of the European General Data Protection Regulations (GDPR) from 25 May 2018.

However, you may be less aware of the fact that many of those emails requesting consent were not best practice and typified organisations with poor or insufficient consent trying to get their houses in order and comply with the new law.

#### **What we are doing**

Rather than embark on similar counter-productive and short-term measures that do not effectively demonstrate compliance, we are looking to implement GDPR in partnership with our legal advisers and based on best practice as mandated by the UK Information Commissioner's Office ("ICO").

The ICO has consistently stated that compliance with GDPR is not based on prescriptive measures but by the process of evaluating and implementing Data Protection measures that are appropriate for each organisation. In short, it is not prescriptive, it is a process.

The nature of our organisation and indeed most membership organisations, requires a methodical review of many factors to implement appropriate and lasting compliance across the organisation. These measures include a review of existing procedures under the previous law, the Data Protection Act 1998, identifying areas of concern and understanding how the organisation and its members operate.

We have already undertaken a detailed data mapping exercise tracking how personal data is obtained, transmitted, processed, stored, retained and deleted, and have identified areas that will be improved to ensure that we are demonstrating compliance with GDPR in future.

For this organisation, we turn to the guidance provided in the recitals to the GDPR text, more specifically recitals 98 and 99. These cover organisations such as ours which are bodies that represent categories of controllers or processors and recommend the use of a Code of Conduct to effectively create compliance across all branches of the organisation.

It is recommended in the text that this should be done in the form of consultations, and includes obtaining input from “relevant stakeholders, including data subjects” - i.e. you, the members.

We have embarked on this consultation process to ensure that the compliance measures we are taking with the Code of Conduct will be truly effective, will help members and units to function as effectively and efficiently as possible and to keep any changes or new measures to an absolute minimum.

We are not looking to make members jump through cumbersome and unnecessary hoops to function as we always have. Rather, this will be an evolution of our existing policies and practices when using the personal data of members.

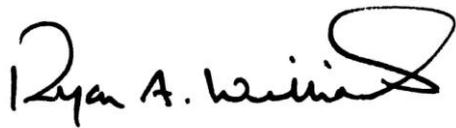
**What happens next?**

In the coming week, I will be contacting all those who have access to the Keystone Online membership database to explain about the roll out of a User Agreement. Continuation of your access will depend on completion of this Agreement.

Work is already well advanced in drafting the Code of Conduct referred to above. This document will enshrine many of the key elements of our approach to GDPR compliance as well as providing appropriate guidance on any action you may need to take.

I am confident that the approach we are taking, guided by our legal advisers, will ensure that we establish, demonstrate and maintain modest yet effective measures to achieve compliance with GDPR.

With fraternal regard and best wishes.

A handwritten signature in black ink that reads "Ryan A. Williams". The signature is written in a cursive style with a large, looping initial 'R'.

R.W.Bro. Ryan A Williams, P.G.J.W.  
Grand Secretary