

# Call for Views: Code of Practice for the use of personal information in political campaigns

The ICO's new Code of Practice for the use of personal information in political campaigns will draw from our current Guidance on Political Campaigning, but will be fully updated to ensure it reflects the current Data Protection Act 2018 and GDPR requirements. It will also be widened to cover areas where our investigation found significant concerns or misunderstandings of the law. In addition, it will provide guidance and good practice recommendations to aid compliance.

Responses to this call for views must be received by **11.59pm on Friday 21 December 2018**

If you would like further information on the call for views please telephone 0303 123 1113 and ask to speak to the Parliament and Government Affairs Department about the call for views on a new Code of Practice for the use of personal information in political campaigns or email

## Privacy statement

We may want to contact you about some of the points you have raised. If you are happy for us to do this then please provide contact details where requested. Your details will only be used to contact you for this purpose and will be deleted following publication of the final Code of Practice. [privacy notice](#).

Q1 Do you agree with our understanding of 'political campaigning' and what processing should be covered by the code?

Yes

No

Please explain further:

Q2 Should the code apply to other data controllers in the political campaigning process, beyond registered political parties, electoral candidates, referendum permitted participants and third party campaigners? Eg data controllers processing personal data on behalf of political campaigns, parties or candidates.

Yes

No

Please explain further:

Q3 Who should the code also be aimed at ie data brokers, analytical companies, online platforms? (List as many as you think are applicable)

We propose the code will include the following broad topic areas:

- The role of data controllers in the political campaigning ecosystem;
- Transparency requirements in practice;
- Accountability, security and data minimisation requirements;
- Lawful bases including the new 'democratic engagement' aspect of the 'public interest' basis in the Data Protection Act 2018;
- Using special category data;
- The use of personal data from the Electoral Register;
- Data collection directly from individuals;
- Using personal data collected by third parties;
- Personal data analytics;
- Direct marketing including the application of the Privacy and Electronic Communications Regulations;
- Online advertising and the use of social media;
- Post political campaign/election considerations.

Q4 Do you agree with the proposed topics?

Yes

No

Please explain further:

Q4c Is there anything we have not listed that ought to be included?

No

Yes

Please specify

Q4b What topic areas in particular ought to be covered in the most detail?

Q5 What do you should be covered in the new code of practice that isn't covered in current political campaigning guidance?

Q6 What factors ought to be taken into account regarding the particular circumstances of different types of election or referenda?

Q7 Please state any case studies or scenarios you would like to see included in the code?

Q8 Please state any examples of guidance, tools or good practice you have encountered that could aid compliance in this area, and could be included in the code.

Q9 Are you answering:

in your own capacity?

on behalf of an organisation

Please describe your organisation and your role:

Q10 Name:

Q11 We may want to contact you about some of the points you have raised. If you are happy for us to do this then please provide your contact details: