

The Labour Party

Affiliated supporter ballot privacy notice — Election of the Leader of the Scottish Labour Party 2026

This privacy notice is for you if you are a member of a trade union or socialist society that is affiliated to the Labour Party, and your affiliated organisation has provided your details to the Labour Party so that your eligibility to vote in the 2026 election for Leader of the Scottish Labour Party can be checked. It explains what the Labour Party does with your personal data for that purpose. It sits alongside the Labour Party's other privacy notices, which you can find at labour.org.uk.

Who is responsible for your personal data?

The Labour Party is the data controller for the eligibility checks described in this notice. Your affiliated organisation is a separate and independent data controller for the data it holds about you and for its decision to share that data with the Labour Party. Your affiliated organisation is responsible for telling you how it uses your data and on what basis it shares it; this notice covers only what the Labour Party does once it receives your data.

Where do we get your personal data?

We did not collect your data directly from you. We received it from your affiliated organisation. We refer to "direct data collection" when data is collected directly from you, and "indirect data collection" when it is not. The data we use for these checks is collected as follows:

- From your affiliated trade union or socialist society, which checks the criteria it is able to (such as that you are a current member of good standing) and provides the Labour Party with a file of those of its members it assesses as eligible, so that your eligibility to vote can be confirmed (indirect data collection); and
- From the Electoral Register, which we check your details against (indirect data collection).

What personal data do we collect?

To carry out the eligibility checks we may use the following personal data about you:

- First name, last name, home address, post code, email address and date of birth;
- Your membership of a trade union, socialist society or affiliated group, your affiliate membership number, and whether you have consented to receive email from the Labour Party;
- Your electoral roll number and whether your details match the Electoral Register at the address provided;
- Confirmation from your affiliated organisation that you meet the membership-based eligibility criteria (current active membership, six months' standing, and where applicable that your political levy is paid or your subscription is in good standing); and
- The outcome of your eligibility check and, where applicable, the reason you were found not to be eligible.

We do not ask your affiliated organisation for your telephone or mobile number for this contest, and we do not use one for these checks.

Information on “special category” personal data

Some of this data is more sensitive data known under the Data Protection Act as “special category data”. In particular, your membership of a trade union or socialist society, and your political opinions, are special category data. The Labour Party processes this as part of the day-to-day running of a political party, and treats it with corresponding care. For the regulator’s definition of special category data you can visit the Information Commissioner’s Office (ICO) website at ico.org.uk.

What do we use your personal data for and what is our lawful basis for using it?

We may use your personal data for the following purposes and on the following lawful bases. We do not sell your personal data to any third parties.

- To check whether you are eligible to vote in the 2026 election for Leader of the Scottish Labour Party — including confirming your membership of your affiliated organisation, checking that you are on the UK electoral register at the address provided, checking you are not already counted as a Labour Party member or under another affiliated organisation, and confirming you have not been suspended or excluded from the Labour Party.
- The lawful basis we rely on is the performance of a task carried out in the public interest by a data controller under UK GDPR Article 6(1)(e), also known as “public task”, or, in the alternative, the legitimate interests of the data controller under Article 6(1)(f). Special categories of personal data are used for the purpose of substantial public interest under UK GDPR Article 9(2)(g), in line with Schedule 1, Part 2, paragraph 22 (political parties) of the Data Protection Act 2018.
- To produce the final list of eligible voters and provide it to Civica Election Services, the organisation appointed to administer the ballot on our behalf.

As above. Civica Election Services acts as our data processor under a contract that meets the requirements of UK GDPR Article 28, which will be in place before any data is shared with it.

If there is a contest, to provide your name and postal address to the candidates’ campaigns so that they can send you election communications by post, on equal terms between the campaigns, and to send a set number of communications on behalf of each candidate to you by email ourselves, where your affiliated organisation has confirmed that you have consented to receive email from us.

As above. We do not give your email address or any telephone number to any candidate, and no candidate may email, text or telephone you directly. Each candidate is a separate and independent data controller for the name and postal address we release. A candidate may use your details only to communicate with you about this election, must keep them separate from any other data the campaign holds, must not combine them with any other information or use them to add to the campaign’s own records, must not pass them to anyone else or upload them to any advertising or social media platform, and must delete them by 17 October 2026.

Your details will be provided to the candidates only if your affiliated organisation has separately agreed that they may be, and only after we are satisfied that each campaign meets our data protection requirements. If your affiliated organisation has not agreed, your details will not be provided to any candidate, and this will not affect your entitlement to vote.

Who do we share your personal data with?

Any data shared with the recipients below is the minimum necessary for the purpose. Within the purposes set out above, we will share your personal data with the following:

- Your affiliated organisation — in limited circumstances, so that it can help you correct your details where we could not verify you for a data-quality reason (for example, where your address does not match the Electoral Register). We never tell your affiliated organisation any reason for ineligibility relating to your Labour Party membership, or to any suspension, exclusion or other governance matter;
- Civica Election Services, as our data processor, to administer the ballot; and
- If there is a contest, and if your affiliated organisation has agreed to it, the candidates' campaigns, as separate controllers, for election communications only. We do not tell any candidate which affiliated organisation you belong to.

We do not share your data with any other affiliated organisation, and we do not sell your data. We never disclose how you have voted or intend to vote. Where we share data with a third party that is not a supplier acting on our behalf, we put a Data Sharing Agreement in place in accordance with the ICO's Data sharing code of practice.

Your personal data is held in the United Kingdom. We do not transfer it outside the United Kingdom, and we require Civica Election Services and every candidate not to do so either.

If your affiliated organisation asked for your consent

Some affiliated organisations ask their members for consent before sharing their details with us. If yours did, you can withdraw that consent at any time by contacting your affiliated organisation. If you withdraw consent, or if you object to receiving communications from candidates, tell your affiliated organisation or contact us using the details below. We will stop using your data and, where your details have already been provided to the candidates, we will require every campaign to remove you from its records within two working days. Withdrawing consent after the ballot has opened may mean we cannot count a vote you have already cast, because ballots are secret and cannot be traced back to you.

How long will we keep your personal data?

We only retain your personal data for as long as necessary for the purpose we collected it for. We delete the bulk of the data we received about you no later than six months after the result of the election is declared. We may keep a minimal record of the outcome of your eligibility check beyond that point only where it is necessary to answer a query about that decision or for the establishment, exercise or defence of legal claims, and we delete it once it is no longer needed for that purpose. Candidates must delete everything we provide to them, and every copy of it, by 17 October 2026, and must confirm to us in writing that they have done so.

What are your rights and how can you express them?

You have rights over your personal data, including the right to ask for a copy of it, to ask us to correct it, and, in some circumstances, to object to or restrict our use of it or to ask us to delete it. Because we are carrying out a one-off eligibility check for an election, some of these rights may be limited where exercising them would prevent us from running a fair and accurate ballot, but we will always consider your request. To understand your rights and submit a request, please contact our Data Protection Team using the details below.

How can you complain about our use of your personal data?

If you are unhappy with how we have handled your personal data, you can make a complaint to the Information Commissioner's Office at ico.org.uk. We would, however, welcome the opportunity to address your concerns before you approach the ICO, so please do contact us first if you can.

How can you contact us about this privacy notice?

If you have any questions about the information in this privacy notice, you can contact the Data Protection Team by email using dataprotection@labour.org.uk or by post within a letter to:

Labour Statutory Data Protection Officer

The Labour Party, Southworks, 20 Rushworth Street, London, SE1 0SS