

31 October 2019

## Re: Committing to a transparent, fair and accountable campaign

As civil society dedicated to defending rights we are deeply concerned about the exploitation of people's data in the political sphere and its impact on privacy and democracy.

The abuse of data in the political context is high on the agenda in the UK, with numerous reports and committees considering this issue. A Code of Practice on the use of personal data in political campaigning by the Information Commissioner is on the horizon. Parliamentarians and regulators, including the Information Commissioner and Electoral Commission have called for urgent legislative action. However, none of this is likely to be forthcoming in advance of the general election due to take place on 12 December 2019. Without real action, including meaningful legislation, the public cannot be expected to have faith in the outcome of the election.

Large platforms, together with the vast 'influence industry' from data brokers, to ad tech, to the providers of campaign tools and services have much to answer for. We are also concerned that political campaigns are abusing the architecture of the internet to obscure the true extent of financial and informal relationships between campaigns, thus gaming the regulatory framework. Political parties must shoulder some responsibility for this and take steps to demonstrate a commitment to respecting people's rights and the democratic process.

We urgently call on political parties to take a principled stand and publicly commit to the following:

1. Be transparent about your data processing activities, including identifying the mechanisms you use to engage with voters (e.g. social media, websites, direct messaging).
2. Be transparent about how you collect people's data and the sources of this;
3. Be transparent on your political ads and messaging. You should ensure that the public can easily recognise political messages and

communications and the organisation behind them. You should make available information on any targeting criteria used in the dissemination of such political messages;

4. Publish a complete, easily accessible and understandable list of any campaign groups you have financial or informal collaborative campaigning relationships with, including all third parties and joint campaigners.
5. Adopt and publish data protection policies and carry out and publish data protection audits and impact assessments;
6. Ensure you have a legal basis for each use of personal data (including any special category data such as those revealing political opinions);
7. Be transparent as to the companies you contract with as part of your campaigns both to obtain data and to further process data, including profiling and targeting, such as data brokers and political advertising companies as well as which companies are providing campaign tools/ software and which products you are using;
8. Ensure that any third party you are using for your campaign activities also complies with data protection laws;
9. Make publicly available timely information on your expenditure for online activities, including paid online political advertisements and communications. This should include information regarding companies assisting you in your online activities, including the amount spent on each companies' services;
10. Facilitate the exercise of data rights by individuals (including providing information about how their data is processed and providing timely access to it)

Adopting and adhering to the above, is urgently needed in order to foster trust in the democratic process. Transparency, fairness and accountability are core tenants of protecting people's data and electoral integrity. Failure to act risks political manipulation and undermines the efforts to rein in the power of big companies in this field. A starting point would be to provide the above information on your party's website.

Actions speak louder than words and we look forward to hearing from you as to whether you are prepared to make and put into practice these important commitments.

**Privacy International**

**FairVote**

**Open Rights Group**

**Institute for Strategic Dialogue**

**Demos**

**Who Targets Me?**