

PART II PRIVACY NOTICE NO 5
(marketing and information sharing)

Legitimate Interests Assessment Form

Title: Legitimate Interests Assessment Form	Issue: 1
Author: James Collinge	Date Issued: 24 th May 2018

Please read the Data Protection Policy – Writing Privacy Notices and the Notes re Part II Privacy Notices: Legitimate Interests for further guidance.

1.	What is the legitimate interest? To provide general marketing information to clients and prospective clients who have approached us at trade fairs and have specifically asked us to provide this information. As we are responding to targeted and specific requests for information rather than running a wider mailing list, we consider that legitimate interests (rather than consent) is the correct basis for processing.
2.	How do we benefit from the processing? <i>Set out what the organisation is trying to achieve by processing the data and what benefits will arise as a result of processing the data.</i> We potentially secure new client contacts who are providing marketing information about our services.
3.	How does the processing of data further the interests detailed in section 2, above? <i>The key is to ensure that whatever data is being processed is directly relevant to the answers given in box 2 so that we can show that data is only being processed for the identified legitimate interest. Set out in this box the specific data that is being processed (names, addresses etc.) and why each of those pieces of data has to be processed in order to further the interests identified in box 2, above.</i> Many potential clients will not live in the area in which we operate and may not be aware of what we can do for them. Processing their data to the extent necessary to send them the marketing information they have requested therefore furthers the interests set out box 2, above.
4.	Who else will benefit from the processing? <i>If a third party or parties more generally will benefit from the processing, set out brief details of who they are and what the benefit is perceived to be.</i> Prospective clients will benefit from the processing if, as a result of receiving our materials, they decide that our services are right for them.
5.	What would be the impact on the organisation or on the third parties identified in box 2 if the data is not processed? It would be significantly harder to grow or maintain our business without taking active steps to liaise with potential clients at trade fairs.

6.	<p>Is there any other way of reasonably achieving our objective?</p> <p><i>Answer “yes” or “no” – if the answer is “yes”, set out the steps that could be taken and then refer the matter to the DPO who will make a final decision on whether the data can be processed for that purpose. Take no further steps as regards completing this form or processing any data until such a time as the DPO has confirmed.</i></p> <p>No</p> <p>DPO approval to continue with form: Signed (DPO) Date <i>(only to be completed if answer is “yes”)</i></p>
7.	<p>Is there any other less intrusive way of achieving our objective?</p> <p><i>Answer “yes” or “no” – if the answer is “yes”, set out the steps that could be taken and refer the matter to the DPO who will make a final decision on whether the data can be processed for that purpose. Take no further steps as regards completing this form or processing any data until such a time as the DPO has confirmed.</i></p> <p>No</p> <p>DPO approval to continue with form: Signed (DPO) Date <i>(only to be completed if answer is “yes”)</i></p>
8.	<p>What is our relationship with the individual data subject whose data we are processing?</p> <p>Client or prospective client.</p>
9.	<p>Is any of the data we are processing particularly sensitive or private?</p> <p><i>If we are processing any special category data as more particularly defined in the headline data protection policy, answer “yes”. If we are not processing special category data but nonetheless the data might be regarded as sensitive or private, answer “yes”. If the answer is “yes”, refer the matter to the DPO who will make a final decision on whether the data can be processed for that purpose. Take no further steps as regards completing this form or processing any data until such a time as the DPO has confirmed.</i></p> <p>No</p> <p>DCO approval to continue with form: Signed (DCO) Date <i>(only to be completed if answer is “yes”)</i></p>
10.	<p>Are we doing something unusual which an individual may not reasonably expect a business of our sort to do with the data?</p> <p><i>Answer “yes” or “no” – if the answer is “yes”, set out what is unusual and then refer the matter to the DPO who will make a final decision on whether the data can be processed for that purpose. Take no further steps as regards completing this form or processing any data until such a time as the DPO has confirmed.</i></p> <p>No</p> <p>DCO approval to continue with form: Signed (DCO) Date <i>(only to be completed if answer is “yes”)</i></p>
11.	<p>Will the proposed processing cause (or potentially cause) the individuals any unjustified or unnecessary harm?</p> <p><i>Answer “yes” or “no” – if the answer is “yes”, set out what harm might be caused and then refer the matter to the DPO who will make a final decision on whether the data can be processed for that purpose. Take no further steps as regards completing this form or processing any data until such a time as the DPO has confirmed.</i></p> <p>No</p> <p>DCO approval to continue with form: Signed (DCO) Date <i>(only to be completed if answer is “yes”)</i></p>

