

Legitimate Interests Assessment

Study Group Data

Subject: Personal data on group members held and processed by Study Group Leaders (SGLs).

Summary: In order to operate a study group it is necessary for the Study Group Leader (SGLs) to hold and process contact details for the members of that group. Without contact details, the members of the group cannot be contacted about meetings and events or about the cancellation of same. It is deemed that this is an essential part of running a group and that holding and processing of the data is therefore covered by the lawful basis of "Legitimate Interests".

Assessment:

Part 1 - Identify the Legitimate Interests

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| 1 | Why do we want to process the data - what are we trying to achieve? | Data is only processed in order to communicate with study group (SG) members and to track attendances at SG meetings. |
| 2 | Who benefits from the processing? | Members benefit because they are able to take part in SG meetings and events. |
| 3 | Are there any wider public benefits to the processing? | The wider benefits are the charity's objectives, to assist in the education and well-being of the Third Age. |
| 4 | How important are those benefits? | These benefits are the whole purpose of the U3A movement and why people join. |
| 5 | What would be the impact if we could not go ahead? | If SGLs cannot store and process members contact information, they cannot arrange meetings and the SG could not continue. |
| 6 | Would use of the data be unethical or unlawful in any way | No. The data is freely given for the purposes of communication. |

Part 2 - Apply the "Necessity Test"

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| 1 | Does this processing actually help to further that interest | Yes, to enable attendance at events, and to provide feedback afterwards. |
| 2 | is it a reasonable way to go about it | We believe that this is the best way to go about keeping in contact with members. |
| 3 | is there another less intrusive way to achieve the same result | No. |

Part 3 - Perform a Balancing Test

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| 1 | What is the nature of our relationship with the individuals | The individuals are U3A members who have chosen to take part in a particular SG activity for the purpose of education and/or to improve their wellbeing. |
| 2 | Is any of the data particularly sensitive or private | The data held and processed is the minimum required to enable the SGL to contact SG members. This is limited to name and contact details other than in exceptional circumstances |
| 3 | Would people expect us to use their data in this way | Yes. |
| 4 | Are we happy to explain it to them | Yes. |
| 5 | Are some people likely to object or find it intrusive | The contact details were given for the purposes of communication, so we believe not. |
| 6 | What is the possible impact on the individual | The possible impact would be if the data were made available to third parties by accident |
| 7 | How big an impact might it have on them | Members could receive some unwanted approaches from companies advertising their products |
| 8 | Are we processing children's data | No. |
| 9 | Are any of the individuals vulnerable in any other way | Yes, but data about their vulnerabilities is not stored by SGLs. The only exception is food allergies and dietary issues which may be requested on an ad hoc basis when members are eating together. |
| 10 | Can we adopt any safeguards to minimise the impact | SGLs have been instructed (and their published guidelines also assert this) to only store information which is essential and to delete data which is not required. Information on members who have left the SG are deleted as soon as possible. |
| 11 | Can we offer an opt-out? | No. A member of an SG who opts out of the SGL storing their contact details cannot be a part of that group. |
| 12 | Does this LIA identify a significant privacy impact that requires DPIA to be conducted? | No |

Signed on behalf of the WPU3A Executive Committee



JUENGLAN
(VICE CHAIR)

Date

6/1/18

Legitimate Interests Checklist

Study Group Data

Subject: Personal data on group members held by Study Group Leaders .

Summary: In order to operate a study group it is necessary for the Study Group Leader to hold and process contact details for the members of that group. Without contact details, the members of the group cannot be contacted about meetings and events or about the cancellation of same. It is deemed that this is an essential part of running a group and that holding and processing of the data is therefore covered by the lawful basis of "Legitimate Interests".

Checklist

- We have checked that "legitimate interests" is the most appropriate lawful basis.
- We understand our responsibility to protect the individual's interests.
- We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
- We have identified the relevant legitimate interests.
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
- We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests.
- We only use individual's data in ways that they would reasonably expect, unless we have a very good reason.
- We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.
- We do not hold children's data.
- We have considered safeguards to reduce the impact where possible.
- We have considered whether we can offer an opt-out.
- If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA.
- We review our LIA on an annual basis and repeat it if circumstances change.
- We include information about our legitimate interests in our privacy policy.

Signed on behalf of WPU3A Executive Committee

Date

6 Jul 18



JM ENGLAND
(VICE CHAIR)