



Legitimate Interests Assessment

<include title here>

Subject:		
Summary:		
Assessment:		
Part 1 - Identify the Legitimate Interests		
1	Why do we want to process the data - what are we trying to achieve?	
2	Who benefits from the processing?	
3	Are there any wider public benefits to the processing?	
4	How important are those benefits?	
5	What would be the impact if we could not go ahead?	
6	Would use of the data be unethical or unlawful in any way	
Part 2 - Apply the "Necessity Test"		
1	Does this processing actually help to further that interest	
2	is it a reasonable way to go about it	
3	Is there another less intrusive way to achieve the same result	
Part 3 - Perform a Balancing Test		
1	What is the nature of our relationship with the individuals	
2	Is any of the data particularly sensitive or private	
3	Would people expect us to use their data in this way	
4	Are we happy to explain it to them	
5	Are some people likely to object or find it intrusive	
6	What is the possible impact on the individual	
7	How big an impact might it have on them	
8	Are we processing children's data	
9	Are any of the individuals vulnerable in any other way	
10	Can we adopt any safeguards to minimise the impact	
11	Can we offer an opt-out?	
12	Does this LIA identify a significant privacy impact that requires DPIA to be conducted?	
Signed		Date

Legitimate Interests Checklist

<include title here>

Subject:

Summary:

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

Date