

This legitimate interests assessment (LIA) follows ICO guidelines and is updated yearly or as significant change occurs. It should be used alongside the ICO [legitimate interests guidance](#).

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

We process to discover which schools would benefit from the workshops provided by our Non Profit making organization.

We expect to identify teachers and classes who may wish to buy our service.

Third parties that have an education interest in running one of our workshops in order to benefit the students in their care and possibly the wider community. It may improve learning outcomes, aid with OFSTED assessment and increase engagement.

Our workshops have run in areas with high levels of social tension around race, they have been hugely beneficial in calming this process.

Without this data processing, our organisation and the activities it offers could not continue.

If we did not ask schools who was interested in our workshops within their school we could send emails to teachers who were not interested, becoming an annoyance. We would not be able to share and deliver our services.

Yes, we work closely with Sprint Media's systems who manage data on their CRM system on our behalf.

We comply with the GDPR.

We comply with industry guidelines and codes of practice.

The data we are using is commercial and not personal.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

This processing will enable us to ask first points of contacts in the school to share our information with those who may be interested.

With historical data we will have contacts with named individuals who have visited our website, opened our emails and/or requested quotes and further information from us.

Processing this data helps us find schools happy to allow us to deliver our workshops to their children.

We cannot contact schools by email to ask if teachers may be interested in a workshop without this processing. We would rely on teachers finding us. Many very mono cultural schools who have real need of our input would have no experience of our offer and would be excluded from benefiting from it.

Contacting the first point of contact and/or communicating with staff who have expressed interest in the past is the least intrusive way.

We are careful to not email excessively.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data
<ul style="list-style-type: none">• Is it special category data or criminal offence data?• Is it data which people are likely to consider particularly 'private'?• Are you processing children's data or data relating to other vulnerable people?• Is the data about people in their personal or professional capacity?
No
No
No
No
Reasonable expectations
<ul style="list-style-type: none">• Do you have an existing relationship with the individual?• What's the nature of the relationship and how have you used data in the past?• Did you collect the data directly from the individual? What did you tell them at the time?• If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?• How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?• Is your intended purpose and method widely understood?• Are you intending to do anything new or innovative?• Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?• Are there any other factors in the particular circumstances that mean they would or would not expect the processing?
<p>With circa 2000 records, we have an existing relationship of some sort with the individual involved.</p> <p>We have either sold a workshop to them or had them request a quote from us. If they are using the same computer they request a quote from, we may also know when they have visited our website.</p> <p>We told them the data would be used to process their quote and tell them about our services in future.</p> <p>Our intended purpose is widely understood to share information about our activities.</p>

With Sprint data we do not have a prior relationship, it is first point of contact data in the school who we ask to disseminate the information if they feel it would be of interest. They can always unsubscribe.

Likely impact

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the impact?

It could be annoying to receive emails if you are not interested. It could lead to a great academic and social experience for the students if they are. Individuals can ask to see their data record and can ask to be removed at any time.

The impact is unlikely to be severe – we do not deliver any contentious content nor do we email often. If anyone does feel unhappy they can easily opt out. We are happy to explain processing to an individual and have systems in place to do so.

We can ensure we do not email content which may cause upset or mail content too regularly.

Can you offer individuals an opt-out?	Yes
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Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes
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Do you have any comments to justify your answer? (optional)

LIA completed by	Lotte Bakoji-Hume
Date	20/05/2018

What's next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.