

Cheltenham Local History Society

Legitimate Interests Assessment

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside our [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?

The Society records and utilises members' names, addresses and contact details (including phone and email where permission is given) in order to achieve the objects of the Society which are to advance the education of the public in the history of Cheltenham.

We use the data to collect subscriptions, send out Newsletters and the Journal, to publicise events and publications, and to administer Gift Aid claims.

No members' data is shared with third parties or publicly.

The Society has a Data Protection and Privacy Policy which can be made available on request.

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?

The Society believes it is necessary to be able to contact members to keep them informed of the activities of the Society.

We store and utilise the minimum level of personal details required to administer the Society.

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

- 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?

The Society does not store special category, criminal offence data, or particularly 'private' data.

We do not store children's data.

We do not store details relating to the professional capacity of members.

The Society believes that its use of members' personal details does not impact negatively on individuals' interests and rights and freedoms.

Reasonable expectations

- 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?

New members provide their contact details when joining the Society. The application form informs prospective members of the Society's Data Protection policy.

Members are provided with a renewal form which requests them to provide updated contact details if relevant at the time of annual renewal of membership.

No data is obtained from third parties.

Members' details are recorded on the Membership Secretary's computer and are backed up.

The Membership Secretary shares members' details with relevant committee members for example:

- mailing addresses to enable distribution of the Newsletter and Journal
- email addresses to enable the circulation of regular emails (approximately monthly) with information about events and other items of interest
- details to support a Gift Aid claim.

We believe that members will have an expectation that a local history society will use their details in this way.

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?

The impact of the data processing is that members will be kept informed of and are able to participate in the activities of the Society.

The Membership Secretary is responsible for the secure storage and backup of members' data.

Data is only shared with other committee members where there is a need relevant to the objects of the Society to do so.

The frequency of contact with members e.g. by email is at an appropriate level to keep them informed about Society activities and is not considered to be intrusive.

Data is not shared with third parties or publicly.

Can you offer individuals an opt-out?

Yes / No

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 / No

Do you have any comments to justify your answer? (optional)

We believe that the Society's use of members' personal data to administer the Society is for their benefit as members, not for the Society's benefit, and that members will have a reasonable expectation that we use their personal details in this way.

LIA completed by

Approved by the CLHS committee

Date

30/08/2018

Review date

March 2020