**Legitimate Interests Assessment:**

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| STEP 1: CONDUCTING A PURPOSE TEST | **YES** | **NO** | **ADDITIONAL NOTES** |
| We know why we want to process the data and what we are trying to achieve. |  |  |  |
| We understand who benefits from the processing and in what way. |  |  |  |
| We have investigated whether there are any wider public benefits to the processing and how important those benefits are. |  |  |  |
| We have evaluated what the impact would be if we couldn’t go ahead with the processing. |  |  |  |
| We have scrutinised whether our use of the data would be unethical or unlawful in any way. |  |  |  |
| STEP 2: CONDUCTING A NECESSITY TEST | **YES** | **NO** | **ADDITIONAL NOTES** |
| We have determined that our processing helps to further the legitimate interest that we have identified. |  |  |  |
| We agree that our plans are a reasonable way to go about processing individuals’ data. |  |  |  |
| We have considered whether there is a less intrusive way to achieve the same result. |  |  |  |

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| STEP 3: CONDUCTING A BALANCING TEST | **YES** | **NO** | **ADDITIONAL NOTES** |
| We have identified the nature of our relationship with the individuals. |  |  |  |
| We have determined whether any of the data is particularly sensitive or private. |  |  |  |
| We have considered whether people would expect us to use their data in this way. |  |  |  |
| We are happy to explain to people how we use their data. |  |  |  |
| We have considered whether some people are likely to object or find it intrusive. |  |  |  |
| We have considered the possible impact on the individual and how big that impact would be. |  |  |  |
| We have determined whether we process any children’s data. |  |  |  |
| We have considered whether any of the individuals are vulnerable in any way. |  |  |  |
| We have examined whether we can adopt any safeguards to minimise the impact our processing would have on individuals. |  |  |  |
| We have examined whether we can offer an opt-out to individuals. |  |  |  |
| Does the impact of our processing override our interests? |  |  |  |

After conducting your three-part LIA, complete the general considerations checklist below to identify anything else that may prevent you from relying on the legitimate interests clause to process data.

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| GENERAL CONSIDERATIONS FOR USING LEGITIMATE INTERESTS | **YES** | **NO** | **ADDITIONAL NOTES** |
| We have checked that legitimate interests is the most appropriate basis for processing data. |  |  |  |
| We understand our responsibility to protect the individual’s interests. |  |  |  |
| We have conducted an 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 our legitimate interests. |  |  |  |
| We only use individuals’ data in ways 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 that could cause them harm, unless we have a very good reason. |  |  |  |
| If we process children’s data, we take extra care to make sure we protect their interests. |  |  |  |
| 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 data protection impact assessment (DPIA). |  |  |  |
| We keep our LIA under review, and repeat it if circumstances change. |  |  |  |
| We include information about our legitimate interests in our privacy notice. |  |  |  |