

# The Old Collyerians Association (“OCA”)

## Legitimate Interests Assessment

- We have checked that legitimate interests is the most appropriate basis.
  - *We are satisfied that there is a relative and appropriate relationship between the data subject and data controller*
  - *The data subject has freely provided their personal information to the data controller to use to support the aims and objectives of the OCA*
  - *We have a clear and transparent Privacy Policy to show the data subject how we process their data and for what purposes*
  - *We are satisfied that our legitimate interests are a valid reason for storing and processing members’ personal data*
  
- We understand our responsibility to protect the individual’s interests.
  - *We only use personal data for reasons that members can reasonably expect*
  - *We do not share personal data with third parties*
  - *We store personal data securely*
  
- We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
  - *Our Legitimate Interests Assessment was conducted on 23<sup>rd</sup> May 2018*
  - *Our Legitimate Interests Assessment was approved at a meeting of the OCA Committee on 23<sup>rd</sup> May 2018*
  - *A copy of our Legitimate Interests Assessment can be viewed on our website*
  
- We have identified the relevant legitimate interests.
  - *The OCA Rules clause 2b state one of the Associations aims as: “To promote social contacts between members by periodic reunions, newsletters and other means of communication”*
  
  - *The OCA stores and processes members’ personal data to fulfil these objectives*

We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.

- *It is necessary to process personal data for the efficient running of the OCA*
- *It is necessary to process personal data for the OCA's aims and objectives*
- *Only essential personal data is held and processed for the above reasons*
- *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.

- *One of the OCA's stated aims is "To promote social contacts between members by periodic reunions, newsletters and other means of communication"*
- *It is in our members' interests to receive communications from the OCA*
- *Members will still have the right to access their data, restrict its processing and have their data erased from our records by opting out*
- *We are satisfied that our members' 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 use the data to maintain our membership records*
- *We use the data to contact members about subscription renewals*
- *We use the data to send members our newsletter and other notices*
- *We use the data to contact members about reunions, meetings and other events but only when these are relevant*
- *We do not share personal data with third parties*

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 only use members' data for purposes they would reasonably expect*

If we process children's data, we take extra care to make sure we protect their interests.

- *We do not process children's data*

- We have considered safeguards to reduce the impact where possible.
  - *We do everything reasonably practical to protect personal data*
  - *Personal data is stored securely*
  
- We have considered whether we can offer an opt out.
  - *We do offer an “opt out” and this is clearly stated to members*
  
- If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a Data Protection Impact Assessment.
  - *We do not consider there to be a significant privacy impact*
  - *The data we store and process is not of a sensitive nature*
  
- We keep our LIA under review, and repeat it if circumstances change.
  - *We review our LIA annually at the first committee meeting of the year*
  - *We review our LIA when any changes to circumstances and/or legislation occur*
  
- We include information about our legitimate interests in our privacy notice.
  - *We provide information about our legitimate interests in our privacy notice*
  - *A copy of our Privacy Notice can be viewed on our website*