

Lewis-Manning Hospice - Legitimate Interest Rationale

| What activity do we want to do? | Have we got a legitimate interest taking account the individual's reasonable expectations? | Can we be confident we aren't overriding the individual's rights? | Can it pass the legitimate interest test? |
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| <p>We want to increase the awareness of the services patients living with cancer and other life-limiting illnesses and their families can receive and to encourage people to use the services on offer.</p> | <p>Yes, we have a legitimate interest in doing this activity.</p> <p>Increasing awareness is fundamental in supplying patients and their families with the care they need.</p> | <p>The data has been provided by our patients and their families during patient care. We will never process personal data where the interests of the data subject are overridden.</p> | <p>Yes. As our patients and their families are already in contact with us, it is within reasonable expectations that we will keep in contact with them. They will have received our privacy notice and are aware of their rights with regard to their data.</p> |
| <p>We want to engage with our existing supporters to increase and maintain funding so that we can continue to offer the services to patients and their families.</p> | <p>Yes, we have a legitimate interest in doing this activity.</p> <p>As many of our supporters are patients and patient's families and friends, they will understand the work we do and the need to raise funds to enable us to continue offering the services.</p> <p>Other supporters, such as those registering for our fundraising activities and events are likely to reasonably expect further contact regarding our forthcoming fundraising plans and Hospice news.</p> | <p>Supporters have given us their data when they registered to support us, e.g. by registering for me of our events. They will also have received our privacy notice detailing how their data is used.</p> | <p>Yes. Our supporters have already donated in some way, so have given their data freely. They will also be made aware of their rights for amending or withdrawing our use of their data.</p> |
| <p>We would like to find out more about some specific individuals who have supported us at a higher level, e.g. given a donation of over £500, so that we can tailor</p> | <p>Yes, we have a legitimate interest in doing this activity.</p> <p>By tailoring our communications to supporters according to their interests the</p> | <p>Yes, they have provided us with their details and our Privacy Notice has been provided to them with all relevant information.</p> | <p>Yes. As the individual has already supported us we believe that this activity would be within their reasonable expectations, as we have</p> |

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| <p>our future communications to them.</p> | <p>experience of those individuals, will be improved as they will receive communications that are more interesting and engaging to them.</p> <p>This allows us to do more for our cause, by understanding likely philanthropic interests and making a better connection between our charity and our supporters.</p> | | <p>provided them with our privacy notice to clearly explain the lawful basis and future processing, but we will always consider whether it will override their privacy rights.</p> <p>We have received no previous objections from individuals about this work and we have no wider evidence from research or feedback from supporters that this would be thought of as intrusive.</p> <p>As above, we will review this on an ongoing basis, keep any information we hold securely, and ensure that we do not hold any information for longer than is necessary.</p> |
| <p>We would like to find new supporters and potential major donors to our cause by researching to find individuals who might be interested in our cause or be able to support us at a high level. These might be local business people who have been prominent in our community or people who have made public an interest in our particular area of work.</p> | <p>Yes, we believe we have a legitimate interest to do this.</p> <p>For our charity to survive and do more for our cause, we need to find new supporters and raise more money. Without doing research to find people who might be interested in donating to us we can only do 'mass' fundraising (door drops, advertising) which is untargeted, expensive and a less efficient use of charity resources.</p> | <p>Yes, we do not believe that this activity would be deemed that intrusive or beyond individual's reasonable expectations as it is information that is all publicly available and we have made the following assessments and processes.</p> <p>As we do not have a pre-</p> | <p>Potentially yes, but not in all cases.</p> <p>We understand that there is more of a risk that this could be deemed intrusive as the individual does not have a prior relationship with us and would not be aware straight away that we are processing their data in this way.</p> |

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| <p>The activity would involve looking at publicly available information (press articles, public profiles on networking sites, etc.)</p> | | <p>existing relationship with the individual they might not expect our particular organisation processing their data in this way. Therefore, we need to ensure that we provide them with our privacy notice to make them aware that we have processed their data for this purpose at the earliest opportunity –within 1 month where feasible.</p> <p>If, following contact with an individual we do not have a response, then we will stop processing the data.</p> | <p>We would also need to make a judgement on a case by case basis according to the sources of the information and whether we think it would become too intrusive.</p> <p>We will review any responses or questions that individuals might have if we contact them after this activity to continually assess whether individuals view it as beyond their reasonable expectations.</p> |
| <p>We would like to sift information on the general demographic information of the local area that a supporter lives in. The address information that an individual has provided to us would be enhanced through general demographic information from a third party supplier (e.g. Experian/MOSAIC).</p> <p>This extra information would help us to tailor our future communications and fundraising requests to try and be most</p> | <p>Yes, we have a legitimate interest in doing this activity. We need to be able to send direct marketing to supporters so that we can raise money for our cause, and the more informed we can have on our supporters, the more our direct marketing communications with supporters can be appropriate and relevant to them.</p> <p>These are individuals who have a pre-existing relationship with us by supporting us in the past. We have clear information in our privacy notice about using data in this way. We have made that privacy notice accessible to the individual and provided a fair</p> | <p>Yes, because we have a lawful basis for processing this data, we have provided the right information at the right time, and not received any objection from the individual.</p> <p>Because this information is general demographic information based on an area we believe that it is not intrusive and believe that it will give the</p> | <p>Yes.</p> <p>We believe that there is a low risk that this activity will mean that there is a mismatch between our legitimate interests and the individual's privacy rights.</p> <p>We will continue to review any insight, evidence, information that is available on this kind of activity and take into account any feedback or complaints that we get from supporters.</p> |

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| <p>relevant to that individual.</p> | <p>processing notice. The individual was given a clear opportunity to prevent their data being used in this way and they have not done so.</p> | <p>individual a better experience of their engagement with us.</p> | <p>We will remind people from time to time in the future that we process their data for fundraising purposes and give them further opportunities to register any objection.</p> |
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