**Legitimate Interests Balancing Exercise**

**Activity to be assessed:** Newsletter mailing to supporters

**Prepared by:** Felicity Ransom, Marketing & Database Manager

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| **Processing of an individual’s data** | **Do we have a legitimate interest, taking account of the individual’s reasonable expectations?** | **Are we sure we aren’t overriding their fundamental rights?** | **Are we confident we pass the legitimate interest test?** |
| We want to contact donors with our bi-annual newsletter containing information about hospice updates, covid-19 information & updates on our fundraising activities.  The mailing list will be compiled of anyone who has made a donation in the past 24 months.  Excluding:   * Under 16s * Postal Opt Outs * No newsletter attribute * FPS registered * No Requests   The mailing list will be segmented as follows:   * General Supporter * Corporate Supporter | Yes, we have a legitimate interest.  Sending the letter is direct marketing, which may be considered a legitimate interest.  The individuals would reasonably expect us to send the newsletter because:   * They have donated to us in the recent past. * In the acknowledgement of their initial & subsequent donation they were informed that we will send them information about how their support is helping and upcoming fundraising activities. * They were directed to our privacy policy and directed on how to opt out of further communications and have not done so. | Yes, we are sure that we are not overriding their fundamental rights.  The individuals have not objected to receiving direct marketing.  The newsletter we want to send is relevant and updates our supporters on the hospice. It doesn’t place the individuals under undue pressure to donate and will be timed so that the same individual doesn’t receive other mailings or appeals from Bolton Hospice during the month in which it is sent.  Information about how to opt out of further communications will be included in the letter.  We will manually remove from the mailing list anyone we believe to be in vulnerable circumstances, in line with guidance from the Institute of Fundraising. | Yes |

**Approved by: Alice Atkinson, Director of Income Generation & Communications**  
**Date:** 20.7.20