**Legitimate Interests Balancing Exercise**

**Activity to be assessed:** Christmas Draw Mailing

**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 supporters who:* Are current lottery members
* Have previously bought summer or Christmas draw tickets
* Have previously made a donation to our Christmas or summer draw
* New donors excluding those who were sent LUAL mailing

The letter will ask them to consider buying tickets for our Christmas Draw and/or make an additional donation to the hospice.The following supporters will also be excluded:* Under 16s
* Postal opt outs
* FPS registered
* No requests
* No lottery draw tickets
* Those who have received but not bought tickets for the last three Christmas draw mailings.
* New SEC lottery members from 5th August 2020
* First donation in the past 6 weeks
 | Yes, we have a legitimate interest.Sending the letter is direct marketing, which may be considered a legitimate interest.Mailing for early November – at least 6 weeks after first donation for new donor segment. The individuals would reasonably expect us to send the letter because:* They have bought draw tickets in previous years
* They are current lottery members
* Supporters have donated in recent past & not opted out of communications.
* New lottery members (excluding recent SEC canvassed members) who aren’t aware we run a Christmas draw – opt out message included in the letter sent.
 | Yes, we are sure that we are not overriding their fundamental rights.The individuals have not objected to receiving direct marketing.The letter we want to send is relevant.Information about how to opt out of further communications will be included in the letter.2 versions of the letter - in the letter copy to members will mention about ‘extra tickets’ to ensure they are clearly informed that as a member they are already entered with their lottery number and any tickets bought will be additional entries.  | Yes |

**Approved by:** Alice Atkinson

**Date:** 17.10.2020