**Legitimate Interests Balancing Exercise**

**Activity to be assessed:** Newsletter mailing sent to our corporate supporters

**Prepared by:** Sarah James Data & Direct Marketing Coordinator

**Details of the proposed processing:**

We want to contact corporate supporters with a dedicated mailer containing information about hospice updates, how their support is helping and upcoming fundraising activities.

The mailing list will be compiled of organisations that are categorised as a company in our database and who have made a donation within the last 3 years

The following segment hierarchy will apply

* Corporate supporters (those who have made donations within the last 3 years)

In pulling the mailing list, the following exclusions will apply:

* Under 16s
* Postal Opt Outs
* Those who have requested not to receive newsletters

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| --- | --- | --- |
| **Purpose Test** | **Necessity Test** | **Balancing Test** |
| **Do we have a legitimate interest, taking account of the organisations reasonable expectations?** | **Is the processing detailed above necessary to achieve the purpose?**  **Could the purpose be achieved by some other reasonable means without processing the data in this way?** | **Are we sure we aren’t overriding any fundamental rights or freedoms?** |
| Yes, we have a legitimate interest.  Sending the newsletter is direct marketing, which may be considered a legitimate interest.  The individuals would reasonably expect us to send the letter because:   * They have donated to us in the recent past. * The newsletter is relevant local news * 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, processing is necessary to achieve the purpose of keeping the organisation informed of hospice activity and future fundraising activities  This purpose could not be achieved without processing the data in the manner specified. | 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 corporate 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 |

**To be completed by Alice:**

Purpose test – is there a legitimate interest behind the processing? **✓** Yes □ No

Necessity test – is the processing necessary for that purpose? **✓** Yes □ No

Balancing test – is the legitimate interest overridden by the individual’s interests, rights or freedoms? □ Yes **✓** No

**Outcome:**

**✓** Approved □ Not Approved

**Date:** 9th March 2021