**Legitimate Interests Balancing Exercise**

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

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

**Details of the proposed processing:**

We want to contact donors with our bi-annual newsletter containing information about hospice updates, summer draw tickets, how their support is helping and upcoming fundraising activities.

The mailing list will be pulled from the current donor database of those who have made a donation within the last 2 years and will include newsletter only & summer draw/draw ticket opt ins.   
We will also be contacting a proportion of lapsed donors to test re-engagement.

The following segment hierarchy will apply

* Committed givers (those who have made 4 donations with the most recent donation being made in the last year)
* Donors who have purchased lottery tickets in the last two years
* Regular givers (with a current standing order/direct debit)
* New donors (from 01.01.2020)
* General Supporters – those who have donated within the last 2 years that don’t fall into any of the above segments.
* Lapsed Donors (testing 50%) – (those who donated 3 years ago, but haven’t since) This segment will exclude Bubble Rush and Midnight Walk donors.

The following exclusions will apply:

* Under 16s
* Postal Opt Outs
* Facebook Donors – no mailings
* No requests
* No newsletter attribute
* FPS registered
* New SEC lottery members from 3 months of anticipated newsletter landing date
* Corporate Supporters (will receive a separate newsletter)

Any supporters with a ‘No Lottery Draw Ticket’ attribute will receive a general letter without any information on the summer draw.

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| **Purpose Test** | **Necessity Test** | **Balancing Test** |
| **Do we have a legitimate interest, taking account of the individual’s 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 the individual’s fundamental rights or freedoms?** |
| 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 letter because:   * They have donated to us in the recent past or (in relation to the lapsed donors) they would expect us to reach out to them as past donors due to the unprecedented coronavirus pandemic and its effect on the hospice. * 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 recipient informed of hospice activity, future fundraising activities and the summer draw.  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 letter we want to send is relevant.  Information about how to opt out of further communications will be included in the letter.  Players who have previously purchased lottery tickets will be sent either an 18 or 24 ticket booklet according to their purchasing history, aligning the product more closely to their desired expenditure |

**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:** 25th January 2021