**Legitimate Interests Balancing Exercise**

**Activity to be assessed:** Light up a Life Appeal Direct Mailing 2023

**Prepared by:** Asma Alam Data & Direct Marketing Coordinator

**Details of the proposed processing:**

We want to contact donors with our annual Light up a Life (LUAL) mailing, to inform and engage recipients of the campaign and raise funds for the hospice. The mailing will ask donors to consider making a donation to the LUAL appeal, whilst at the same time helping to support other patients and families who will access the hospice’s services over the winter period.

The mailing list will be pulled from the current donor database, sending to those who have previously supported LUAL and to donors who have been identified as having a potential interest in the campaign   
  
The following segment hierarchy will apply:

* Those who have previously donated to LUAL with a tribute name from (01.01.2017 – to date)
* Those who have previously donated to LUAL without a tribute name from (01.01.2017 – to date)
* Lapsed donors who have previously donated to LUAL in 2016
* Those who have donated in memory from 01.01.2017 – 01.09.2023
* New donors between 01.09.2022 – 01.09.2023 excluding lottery players
* Those who have requested to receive a LUAL mailer
* The following exclusions will apply:
* Under 16s
* Postal Opt Out
* Newsletter only – no other mailings
* No appeals
* LUAL Regular Givers
* Any donors who have had a next of kin bereavement involving hospice services in the last 3 months
* Any in memory donors in the past 6 Weeks.
* New SEC Lottery members in the past 3 months
* FPS registered

|  |  |  |
| --- | --- | --- |
| **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 mailing is direct marketing and considered a legitimate interest.  The individuals would reasonably expect us to send the letter because:   * They have donated to the campaign us in the recent past or they would expect us to reach out to them as past donors. * 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 Light up a Life campaign.  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. |

**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:**