

Atholl SCDC - Legitimate Interest Assessment

1. Purpose Test - Are we pursuing a legitimate interest?

- **Why do we want to process the data – what are we trying to achieve?**

The data that we hold is used to enable us to inform members about event dates, dance programs, the AGM, cancellations and other relevant developments.

- **Who benefits from the processing? In what way?**

The Club membership in general. The data enables us to keep them informed.

- **Are there any wider public benefits to the processing?**

No. The Club does not use this data to communicate with the wider public. Some of the information on Club events that we distribute to members using their email addresses is also published on our web site, which is available to the general public, but this would not include personal details.

- **What would the impact be if you couldn't go ahead?**

We would have to rely on members monitoring our web site to find out details of events.

- **Would your use of the data be unethical or unlawful in any way?**

No.

2. Necessity Test

- **Does this processing actually help us further our legitimate interest?**

Yes. The data that we hold and the way that we use it helps us run the Club activities efficiently and keep the whole membership advised of events and other important issues.

- **Is it a reasonable way to go about it?**

Yes. The membership of the Club is aware that we use their data to help manage Club activities. We do not share data with outside agencies and do not use it for marketing purposes.

- **Is there another less intrusive way to achieve the same result?**

We do not believe there is.

3. Balancing Test

- **What is the nature of your relationship with the individual?**

Individuals are members of the Club.

- **Is any of the data particularly sensitive or private?**

The data we hold on Club members is personal but not particularly sensitive. We do our best to keep it private and would share it only between members with the express permission of both parties.

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- **Would people expect you to use their data in this way?**

Yes, we believe so.

- **Are you happy to explain it to them?**

Yes. Our note to members detailing our privacy policy goes some way towards doing this. We are happy to provide more details if asked.

- **Are some people likely to object or find it intrusive?**

We do not believe so. No one has ever objected to the way we use the data we hold about them.

- **What is the possible impact on the individual?**

Members are kept informed of events and important developments within the Club.

- **Are you processing children's data?**

No. The Club's constitution limits membership to persons over the age of 16.

- **Are any of the individuals vulnerable in any other ways?**

Not that we are aware of.

- **Can you offer an opt-out?**

For those members who do not have or wish to provide an email address, we distribute hard-copy of Club communications personally or by post.

4. Conclusions

- We believe that legitimate interest is an appropriate basis for us to hold and process our Club members' data.
- We hold the minimum amount of information necessary to enable us to efficiently run the Club activities.
- We do not share this data with outside bodies except in ways that members would reasonably expect us to.
- We do not use this data for marketing purposes or make it available to anyone else to do so.
- Sharing of this data between Club members will only take place with the express permission of all people involved.
- Management of some of the Club activities, such as reminding members of dates on which they have volunteered to assist, would be more difficult without access to the data that we hold.

Atholl SCDC Committee - May 2018