**EVCC DATA PROCESSING LEGITIMATE INTERSTS ASSESSMENT**

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| Part 1: Purpose test |

You need to assess whether there is a legitimate interest behind the processing.

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| * Why do you want to process the data? * What benefit do you expect to get from the processing? * Do any third parties benefit from the processing? * Are there any wider public benefits to the processing? * How important are the benefits that you have identified? * What would the impact be if you couldn’t go ahead with the processing? * Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)? * Are you complying with other relevant laws? * Are you complying with industry guidelines or codes of practice? * Are there any other ethical issues with the processing? |
| As a volunteer run and membership sports club we only need to process data to enable the effective running of the club fixtures.  We expect to use data to carry out SWOP analysis and monitor membership numbers  The only third parties that benefit are the regulatory bodies, i.e KCB and ECB  There are no wider public interest benefits to consider as we are a members only club  We have south to comply with GDPR regulations at all times  An inability to process would mean we cannot plan for the clubs future  We fully comply with ECB regulations as evidenced by successful re registration for clubmark |

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| Part 2: Necessity test |

You need to assess whether the processing is necessary for the purpose you have identified.

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| * Will this processing actually help you achieve your purpose? * Is the processing proportionate to that purpose? * Can you achieve the same purpose without the processing? * Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way? |
| Yes, we must record players details to maintain fixtures and for safeguarding issues  We cannot achieve this without processing data  The legitimate interests route means the club does not have to rely on members to actively engage with consent, failure to do so puts the club at risk of breach, thus legitimate interests is best for this club |

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| Part 3: Balancing test |

You need to consider the impact on individuals’ interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

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| **Nature of the personal data** | |
| * Is it special category data or criminal offence data? * Is it data which people are likely to consider particularly ‘private’? * Are you processing children’s data or data relating to other vulnerable people? * Is the data about people in their personal or professional capacity? | |
| We do not process any special category data or criminal offence data  Some medical information may be considered to be particularly private but otherwise we simply process personal details of a general kind available from public sources such as the electoral roll in any event  We do process children’s data but we believe it is proportionate and necessary to do so to provide sporting facilities for those children.  All data processed is in their personal capacity. | |
| **Reasonable expectations** | |
| * Do you have an existing relationship with the individual? * What’s the nature of the relationship and how have you used data in the past? * Did you collect the data directly from the individual? What did you tell them at the time? * If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you? * How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations? * Is your intended purpose and method widely understood? * Are you intending to do anything new or innovative? * Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation? * Are there any other factors in the particular circumstances that mean they would or would not expect the processing? | |
| All data collected is collected directly from the individual or if a child from a parent and or guardian, we do so through the completion of membership forms, as part of the form we include our data processing policy and the statement on legitimate interest choice.  We do not use or share data with third parties  We have no commercial element and as such do not carry out commercial research. | |
| **Likely impact** | |
| * What are the possible impacts of the processing on people? * Will individuals lose any control over the use of their personal data? * What is the likelihood and severity of any potential impact? * Are some people likely to object to the processing or find it intrusive? * Would you be happy to explain the processing to individuals? * Can you adopt any safeguards to minimise the impact? | |
| We have carefully considered the impact of data processing by the club, bearing in mind we are a members only club , the data we process is only for the purposes of providing fixtures and making contact to arrange fixtures, we do not kep special or highly sensitive data, save for coaches who must complete DBS checks, however the processing of that data is legitimate and proportionate in the effective running of a community sports club.  Our GDPR policy documents are uploading to the internet web page and data processing statements are including on all correspondence with members.  Given all members ask to join we do not believe anyone would object to this method of compliance. | |
| Can you offer individuals an opt-out? | Yes |

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| Making the decision |

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

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| Can you rely on legitimate interests for this processing? | | Yes |
| Do you have any comments to justify your answer? (optional) | | |
| LIA completed by | P Goldspring / Ern Marden | |
| Date | 21.3.19 | |

What’s next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.