

General Data Protection Regulation

Legitimate Interests Assessment

Comoodle Project

1. Purpose Test – are we pursuing a legitimate interest?

Why do we want to process the data?	To enable our users to contact each other (securely through the platform environment) to facilitate the sharing of resources. On occasion, to contact platform users about their accounts and to encourage them to participate in platform activity
Who benefits from the processing?	Users benefit by being able to access a range of free or reduced cost assets, which support them in carrying out their worthwhile community activities
Are there wider benefits to the processing?	Yes – increased connectivity between groups; activities occur that would not otherwise have been possible; social value is generated, groups save money and can expand their activities
How important are those benefits?	Social value is demonstrable and important enough to justify the minimal amount of personal data that is being processed
What would the impact be if we couldn't go ahead?	We would not be able to provide the Comoodle resource sharing service if this data was not processed. All associated benefits to the community would be lost
Would our use of the data be unethical or unlawful in any way	No – and we have safeguards to prevent it being used in such a way by users either

2. Necessity Test

Does this processing actually help to further the interest?	Yes – we have tested other means of processing data and this is the simplest, most reliable and most secure way of processing the minimal personal data that is required to further the interest
Is it a reasonable way to go about it?	The processing of minimal personal data (i.e. name, address, email, phone number) in a secure way in a manner that is not visible or accessible to other users, is a reasonable and proportionate way of processing this data and has been designed with privacy in mind
Is there another less intrusive way to go about it?	No – and this method is not very intrusive given that users voluntarily sign up to the platform in full knowledge of what it entails

3. Balancing Test

What is the nature of your relationship with the individual?	Individual users sign up voluntarily to the platform and provide minimal personal data which we keep securely. The data is processed only insofar as it is necessary to facilitate sharing activity between users or for statistical analysis, or to contact users in relation to their accounts or activities, or to encourage them to take part in more activities via Comoodle
Is any of the data particularly sensitive or private?	No
Would people expect you to use their data in this way?	Yes
Are you happy to explain it to them?	Yes
Are people likely to object or find it intrusive?	No – with the possible exception of messaging users to encourage them to take part in other Comoodle-based activity
What is the possible impact on the individual?	Minimal or no impact provided data is kept securely; obvious reputational and practical impact if the data is lost or compromised. We have safeguards against this
How big an impact might it have on them	Minimal or no impact
Are you processing children's data?	No. All users are over 18
Are any of the individuals vulnerable in any way?	Not to our knowledge
Can you adopt any safeguards to minimise the impact?	We have a number of safeguards in place e.g. monitoring of the site, server security protocols. We periodically review and modify our processes to mitigate risks
Can you offer an opt-out?	Yes

Given that:

- Users will reasonably expect us to use their data in this way
- There is minimal privacy impact
- We are a public authority, but processing this data for a legitimate reason other than performing our statutory tasks as a public authority
- The legitimate interests of Comoodle are those of the Council as well as individuals and broader society
- The processing is necessary to achieve the project's objectives and those objectives cannot be achieved in a less intrusive way
- We have balanced our interests against those of the individuals and consider the intrusion is minimal, that the individuals would reasonably expect it and the processing does not cause unjustified harm

**We conclude that Comoodle processes personal data on the lawful basis of
LEGITIMATE INTERESTS**

Signed 

Dated 26/4/18

Duggs Carre, Programme Lead

Signed  Dated 26/04/18

Mark White, Project Manager