

## Legitimate Interests Assessment: Visitor and Professional Contacts Processing

### 1 Purpose Test

What is the legitimate interest behind the processing?

#### 1.1 Why do you want to process the data?

TfGM needs to process the personal data of visitors to our buildings and individuals with whom we do business, such as professional contacts or colleagues in other organisations, for purposes that are not connected to our public task or in exercise of our functions as a public authority.

#### 1.2 What benefit do you expect to get from the processing?

We will be able to invite individuals to meetings in TfGM meeting rooms via the Condeco booking system. We will also be able to lawfully process personal data of business contacts who either contact us directly, or are needed to be contacted by us for purposes not connected with our public task.

#### 1.3 Do any third parties benefit from the processing?

Yes. Contacts of TfGM can be invited to meetings and effectively correspond with us.

#### 1.4 How important are the benefits that you have identified?

These benefits are essential to be able to operate a visitor booking system, and to be able to communicate with individuals with whom we do business.

#### 1.5 What would be the impact if you couldn't go ahead with the processing?

We would be unable to invite individuals to meetings arranged by TfGM. We would also be unable to contact our colleagues in other organisations or process the requests, enquiries and approaches of individuals who contact us.

#### 1.6 Are you complying with any specific data protection rules that apply to your processing (e.g. profiling requirements, or e-privacy legislation)?

N/A

1.7 Are you complying with other relevant laws?

N/A

1.8 Are you complying with industry guidelines or codes of practice?

N/A

1.9 Are there any other ethical issues with the processing?

Processing is also necessary to ensure the safety of TfGM staff and visitors by ensuring that we know the identity of all individuals who are in the building at any time.

## 2 Necessity Test

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

2.1 Will this processing actually help you achieve your purpose?

Yes  No

2.2 Is the processing proportionate to that purpose?

Yes  No

2.3 Can you achieve the same purpose without the processing?

Yes  No

2.4 Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

Yes  No

## 3 Balancing Test

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

### **Nature of the Personal Data**

3.1 Is it special category or criminal offence data?

Yes

No

3.2 Is it data which people are likely to consider particularly 'private'?

Yes

No

3.3 Are you processing children's data or data relating to other vulnerable people?

Yes

No

3.4 Is the data about people in their personal or professional capacity?

Personal

Professional

### **Reasonable expectations**

3.5 Do you have an existing relationship with the individual?

Yes

No

3.6 What's the nature of the relationship and how have you used that data in the past?

In most cases the individuals will be known to TfGM staff as colleagues working together on initiatives TfGM are involved with. Data will have been used for similar purposes previously e.g. when forming a working relationship with a specific individual.

3.7 Did you collect the data directly from the individual? What did you tell them at the time?

Information will primarily either be collected directly from the individuals who send us an email to make contact, or provided by colleagues suggesting a professional contact. Previously no Privacy Notice may have been provided, but from June 2019 this will be corrected by having it linked from our email footer for all outgoing emails, including auto-responses.

3.8 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?

Individuals whose data was provided by colleagues should have been provided with a Privacy Policy for employment which may cover the provision of contact details to colleagues.

3.9 How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?

Data already held will have been collected over a period of time depending on how long the individual has been a contact of the organisation. In general there will have been no changes in technology or context since then that would affect expectations.

3.10 Is your intended purpose and method widely understood?

Yes

No

3.11 Are you intending to do anything new or innovative?

Yes

No

3.12 Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation?

Although there is no evidence in the form of research etc. individuals expect to be able to contact TfGM, and also generally expect to be required to provide details to be sent meeting invitations, receive personalised visitor passes and be signed it to the building.

3.13 Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

No.

## Likely impact

3.14 What are the possible impacts of the processing on people?

There are positive impacts in enabling individuals to contact and visit TfGM.

3.15 Will individuals lose any control over the use of their personal data?

Yes

No

3.16 What is the likelihood and severity of any potential impact?

There is no likelihood of negative impact on these individuals.

3.17 Are some people likely to object to the processing or find it intrusive?

Yes

No

3.18 Would you be happy to explain the processing to individuals?

Yes

No

3.19 Can you adopt any safeguards to minimise the impact? What?

No – minimum data is processed and cannot be further minimised. Data is protected in line with all TfGM online data.

3.20 Can you offer individuals an opt out?

Yes

No

## 4 Decision making

4.1 Can you rely on legitimate interests for this processing?

Yes

No

4.2 Do you have any comments to justify your answer?

TfGM and organisations we work with have legitimate interests in processing personal data of colleagues who visit or contact TfGM for purposes outside of our public task.

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