

LEGITIMATE INTEREST ASSESSMENT FOR GDPR

1. Benefits.

- a. We need to process the data in order to maintain our Beacon membership database which enables better administration of Bourne U3A.
- b. All members of Bourne U3A benefit from using the Beacon database because each member's data is available to those who need to know but not to others. For example, our Group Leaders can only see the members of their Group but not see members of other Groups.
- c. Beacon is a private database, so there are no public benefits.
- d. Before Beacon records were kept in individual spreadsheets maintained by individuals. When a job holder changed the data was not always transferred or used application features that were not understood by the new job holder.
- e. With Beacon we have a standardised set of data and when a job holder changes we can transfer the privileges to the new job holder.
- f. If we couldn't go ahead with Legitimate Interest, then we would have to revert to our current system getting each member's permission every year.
- g. The Beacon data is not unethical or unlawful.

2. Necessity test.

- a. The data makes administration of Bourne U3A easily managed and it is a reasonable way to go about it.
- b. There is not another less intrusive way to achieve the same result.

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3. Balancing Test

- a. Only data of Bourne U3A members and past members is held, and when an individual is no longer a member, the data is destroyed after seven years. It is held this long to satisfy the Gift Aid regulations.
- b. The data held is only contact details for each member together with any Bourne U3A offices they may hold. It is only available to those who need to know.
- c. Our membership form (completed every year) explains that we will hold their data on a database system and in consequence members will expect Bourne U3A to use their data in this way.
- d. As this is a change from our current practice of getting each member to authorise the holding of data we will, of course, explain it to them.
- e. Our members have not found the system intrusive, but if people do object, we could not accept them as members.
- f. We are not processing children's data.
- g. We are developing a Safeguarding Policy to protect vulnerable members.

4. Decision

On consideration of the above, Bourne U3A intend to transfer to GDPR Legitimate Interest for membership applications or renewals after 20th May 2019

Reviewed and approved by Bourne U3A Committee at their meeting on 10th April 2019.

Signed P HOWES Chairman.

A further review will be undertaken when our system is updated