**Legitimate Interests Balancing Exercise**

**Activity to be assessed:** Sponsor a Nurse appeal

**Prepared by:** Sarah James Data & Direct Marketing Coordinator

**Details of the proposed processing:**

We want to contact supporters with a Sponsor a Nurse appeal to inform our audience of how their support helps the hospice and to increase the level of support.

The mailing list will be compiled of donors who have donated from 01.01.2019 to date

The following segment hierarchy will apply

* Those who have donated in memory
* Weekly lottery players
* Those who have donated to LUAL
* Those who have donated to Midnight Memory Walk
* Those who have donated in general within the last 2 years

In pulling the mailing list, the following exclusions will apply:

* Under 16s
* Postal Opt Outs
* Those who have requested not to receive appeals
* Major Donors
* Regular Givers including current Sponsor a Nurse givers
* Those who have donated in memory in the last 3 months
* Those who have joined the Bolton Hospice lottery in the last 9 months
* Those who have donated to the Sponsor a Bed appeal in the past 12 months
* Our Patron scheme members

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| --- | --- | --- |
| **Purpose Test** | **Necessity Test** | **Balancing Test** |
| **Do we have a legitimate interest, taking account of the organisations reasonable expectations?** | **Is the processing detailed above necessary to achieve the purpose?**  **Could the purpose be achieved by some other reasonable means without processing the data in this way?** | **Are we sure we aren’t overriding any fundamental rights or freedoms?** |
| Yes, we have a legitimate interest.  Sending the newsletter is direct marketing, which may be considered a legitimate interest.  The individuals would reasonably expect us to send the letter because:   * They have donated to us in the recent past. * The appeal is relevant in current news * In the acknowledgement of their initial & subsequent donation they were informed that we will send them information about how their support is helping and upcoming fundraising activities.   They were directed to our privacy policy and directed on how to opt out of further communications and have not done so. | Yes, processing is necessary to achieve the purpose of keeping the organisation informed of hospice activity and future fundraising activities  This purpose could not be achieved without processing the data in the manner specified. | Yes, we are sure that we are not overriding their fundamental rights.  The individuals have not objected to receiving direct marketing.  The appeal we want to send out is relevant and requests support for the hospice. It doesn’t place the individuals under undue pressure to donate and will be timed so that the same individual doesn’t receive other mailings or appeals from Bolton Hospice during the month in which it is sent.  Information about how to opt out of further communications will be included in the appeal.  We will manually remove from the mailing list anyone we believe to be in vulnerable circumstances, in line with guidance from the Institute of Fundraising |

**To be completed by Alice:**

Purpose test – is there a legitimate interest behind the processing? **✓** Yes □ No

Necessity test – is the processing necessary for that purpose? **✓** Yes □ No

Balancing test – is the legitimate interest overridden by the individual’s interests, rights or freedoms? □ Yes **✓** No

**Outcome:**

**✓** Approved □ Not Approved

**Date:** 21.04.2021