

ARMAGH COUNTY CLUB

LEGITIMATE INTEREST ASSESSMENT

1. Purpose

The purpose of this document is to document the rationale for the Armagh County Club's ("the organisation's") determination that it has a legitimate interest in the processing of a limited amount of its members' personal data.

2. Legitimate Interest

Article 6(1)(f) of the GDPR provides a lawful basis for processing where:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

Legitimate Interest is therefore an appropriate justification for processing people's data when:

- they have a reasonable expectation that it will be used in a specific way;
- its use will have a minimal privacy impact;
- there is no other, less intrusive, way to achieve the required outcome.

3. Data Processing

The organisation uses personal data to enable it to pursue its aims and objectives. It processes data for the following purposes:

- To administer membership records;
- To fundraise and promote the interests of the organisation;
- To manage volunteers;
- To maintain accounts and records (including the processing of gift aid applications);
- To inform members of news, events, and activities.

The personal data that the organisation processes has been defined following a data audit, which is documented separately. The organisation does not process any data except for the purposes set out above. The organisation does not pass on any information it holds to third parties. The organisation retains data in accordance with the guidance set out within UK's Data Protection Legislation and

relevant Charity Commission requirements. Specifically, the organisation retains membership data; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate. Any member may 'opt out' of receiving communications from the organisation by communicating their wishes to the Committee.

4. Reasonable Expectation

The organisation assesses that its members will have a reasonable expectation that their data will be used for the purposes set out in Section 3 above for the following reasons:

- All members of the organisation have joined it voluntarily.
- In joining the organisation, the members fill out a form in which they voluntarily provide the personal information that will be processed.
- The organisation does not supplement this data with other data obtained from other sources.

5. Necessity

It is necessary that the organisation processes its members' personal data in order that they should be kept informed of its activities. The organisation cannot fulfil this objective in a proportionate manner without processing its members' personal data.

6. Balance of Interests

Having determined that it has a legitimate interest in processing its members data, the organisation must balance this interest against those of the individual.

The organisation has judged that:

- no harm will come to any individual member through its processing of such data;
- that such processing is not intrusive;
- it does not process children's data;
- that the provision of an 'opt out' ensures that members can withdraw their consent to data processing at any time.

The organisation therefore the balance of interests is in favour of such processing. It will carry out periodic reviews of this assessment at not less than five-yearly intervals.