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Company number: 4687078, Incorporated in England, VAT reg. no. 256 4701 02

Registered office: The Retreat, 406 Roding Lane South, Woodford Green, IG8 8EY

Legitimate Interests Assessment

The personal data we process under the legal basis of legitimate interests:

- Is information relating to business where they would reasonably expect us to (because they have received our emails for a period of time prior to GDPR, containing an unsubscribe link, and/or they may have opened those emails to read more and/or clicked on links within those emails.
- Has minimal privacy impact.
- Takes into account and respects people's rights and interests.
- Has been subject to the three elements used for the legitimate interests basis:
 - identify a legitimate interest;
 - show that the processing is necessary to achieve it; and
 - balance it against the individual's interests, rights and freedoms.
- As stated by the ICO on 27/04/2018, we have balanced our interests against the individual's and found that they could reasonably expect the processing, and it would not cause them unjustified harm,
- This record of our legitimate interests assessment (LIA) is to demonstrate compliance, if required.

Information Commissioner's Office Checklist

We have checked that legitimate interests is the most appropriate basis.

Yes.

We understand our responsibility to protect the individual's interests.

Of course.

We have conducted a legitimate interests assessment (LIA) and this document is a record of it, to ensure that we can justify our decision.

Assessment completed: 27/04/2018.

We have identified the relevant legitimate interests.

Business, communications and social media marketing activities to enhance the data subject's business.

Imaginative training and development Ltd

Social media training, marketing and management



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We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.

Sending an email approximately every month is the least intrusive way identified.

We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests.

Yes.

We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.

Yes.

We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.

Yes.

If we process children's data, we take extra care to make sure we protect their interests.

We do not knowingly process children's data.

We have considered safeguards to reduce the impact where possible.

Yes.

We have considered whether we can offer an opt out.

We do offer an opt out. Every email sent includes an unsubscribe option and this is detailed in our Privacy Policy.

If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA.

We have not identified a significant privacy impact.

We keep our LIA under review, and repeat it if circumstances change.

Yes,

We include information about our legitimate interests in our privacy information.

Yes.