

LEGITIMATE INTEREST ASSESSMENT

PART 1

Date of the assessment	26 January 2023
Who is carrying out the assessment?	David Laud
Controller organisation	R2b Media Ltd
Data Protection Officer (DPO)	David Laud
Assessment to be kept under review by	The DPO

PART 2 - PURPOSE TEST

Processing	
What is the purpose for which you are processing the data?	Annual HReSource Survey
Benefits	
What are the benefits you expect to gain from the processing?	<ul style="list-style-type: none"> By reaching out to a broad community of decision makers we can produce and share freely a detailed analysis of HR management trends, concerns, opportunities and priorities.
Will any third parties benefit from the processing?	No
Are there any wider public benefits to the processing?	Yes The research will identify a broad spectrum of management issues that are current and applicable to a much wider audience.
How important are these benefits?	Our free to join business community will be able to gain a greater perspective and understanding of the key issues and trends within business. This data directly impacts those who are employing staff so beyond our community will also will cover the vast majority of business owners in the UK.
Impact	
What would be the impact if the processing could not go ahead?	We would not be able to conduct our survey in an efficient and effective manner. Being precise in our approach helps to ensure that the data collected is both accurate and reflective of the objectives of the exercise.
Compliance	
Are you complying with any specific data protection rules that apply to your processing?	The UK General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA) and We are fully complying with GDPR and PECR guidelines.
Are you complying with other relevant laws?	No - No specific additional laws are known to be particularly applicable at the time of writing.
Are you complying with any industry guidelines or codes of practice?	No
Are there any other ethical issues with the processing?	No

PART 3 - NECESSITY TEST

Will the processing actually help you achieve your purpose?	Yes The ability to communicate with HR decision makers directly ensures the efficacy and accuracy of the exercise.
Is the processing proportionate to your purpose?	Yes We will not use personal data for any purpose other than research and always provide a clear opt out when such communications are distributed.
Can you achieve the same purpose without the processing?	No Opening up a survey to anyone to participate through open forums (pull rather than push approach) can and will result in poor submissions which will invalidate the exercise.
Can you achieve the same purpose by either processing less data, or by processing the data in another more obvious or less intrusive way?	No We have been conducting the survey for over 10 years and this the most efficient method of delivering accurate responses. By sending direct communications to targeted key decision makers we are able to ensure that those responses are valid. Without such a mechanism the research becomes too vague and open to breach by the submission of false responses.

PART 4 - BALANCING TEST

Nature of the personal data	
Is the data being processed special category data or criminal offence data?	No
Is any part of the data particularly sensitive or private?	No
Are you processing children's data or data relating to other vulnerable people?	No
Is the data about people in their professional or personal capacity?	Professional capacity
Reasonable expectations	
Do you have an existing relationship with the individual whose data is being processed?	No
Source of the personal data	Collected directly from the individual
How did you tell about and explain to the individual the use of their data when it was first collected?	
Would individuals expect you to use their personal data in the way in which it is being used?	Yes
Do you have any evidence about the expectation of individuals?	No
Likely impact	
	Irritation of receiving an email from a third party organisation

What are the potential risks of the processing and what are the likelihood and severity of any potential risks?	<ul style="list-style-type: none"> • Likelihood: Remote • Severity: Minimal
Are people likely to object to the processing or find it intrusive?	No
Can you adopt any safeguards to minimise the impact?	Yes <ul style="list-style-type: none"> • Our data security team will regularly review the data collected to ensure that only the required amount of data is stored. Any data that is no longer needed will be deleted.
Can individuals opt-out of the processing?	Yes

PART 5 - DECISION

Can you rely on legitimate interests for this processing?	Yes
Next review date	06 April 2023