

LEGITIMATE INTEREST TEST

These are the factors that we have taken into account when determining whether the processing of people's personal data for the purposes of direct marketing is a legitimate interest for the Association of Palliative Medicine.

Date of assessment 17 November 2022

Assessors Georgina Bula (Compleat Secretariat Services, on behalf of the Association) and David Lowe (Crimson Crab)

Identify the legitimate interest(s)	Comment
Why do you want to process the data – what are you trying to achieve?	To inform potential members of the Association of its benefits / increase membership.
Who benefits from the processing? In what way?	<ul style="list-style-type: none"> • Members – they will have a larger community with which they can engage. • Potential members – they will be able to harness the benefits of membership. • The Association – increased membership numbers will increase the validity and weight of its influence.
Are there any wider public benefits to the processing?	Yes. The Association provides a forum to debate, develop and improve palliative care practice to the benefit of the general public, particularly those undergoing it and their families.
How important are those benefits?	Considerable – they have been widely documented by international organisations and in respected medial journals (for example https://www.who.int/news-room/fact-sheets/detail/palliative-care)
What would the impact be if you couldn't go ahead?	The scope for peer discussion on palliative care would be restricted.
Would your use of the data be unethical or unlawful in any way?	No.
Necessity test	
Does this processing actually help to further that interest?	Yes.

Is it a reasonable way to go about it?	Yes.
Is there another less intrusive way to achieve the same result?	No.
Balancing test	
What is the nature of your relationship with the individual?	They are usually people working in palliative care and who have in some way already come into contact with the Association (for example through attendance at one of our events).
Is any of the data particularly sensitive or private?	No.
Would people expect you to use their data in this way?	Yes.
Are you happy to explain it to them?	Yes – a privacy notice is available on the website of the Association and of the Palliative Care Conference, which include links to the information contained in this document.
Are some people likely to object or find it intrusive?	This processing is not intrusive. Although some people may object to it, we have provided clear information and accessible channels for them to exercise their information rights if this is the case.
What is the possible impact on the individual?	None, other than they may wish to pursue membership of the Association.
How big an impact might it have on them?	Not applicable.
Are you processing children's data?	No.
Are any of the individuals vulnerable in any other way?	No.
Can you adopt any safeguards to minimise the impact?	Not applicable.
Can you offer an opt-out?	Yes – we have provided clear information and accessible channels for them to exercise their information rights.