



Legitimate Interest's Assessment for New Era Vets Customer Survey

A requirement of the General Data Protection Agreement (GDPR) May 2018

A) IDENTIFYING A LEGITIMATE INTEREST

	Question	Answer
1	What is the purpose of the processing operation?	To better understand the Customer's knowledge and views of the service the practice offers to its clients.
2	Is the processing necessary to meet one or more specific organisational objectives?	The processing will help guide changes and improvements to the practice.
3	Is the processing necessary to meet one or more specific objectives of any Third Party?	No.
4	Does the GDPR, e-Privacy Regulation or other national legislation specifically identify the processing activity as being a legitimate activity, subject to the completion of a balancing test and positive outcome?	GDPR does not specifically identify getting feedback from Customers as a Legitimate Interest. However, a well-managed business would gather such feedback. As such customers of the business will not be surprised to receive this survey. One key objective of Afon Vets is to give the best service possible to our clients. We can only know this by asking this our clients for this feedback.

B) THE NECESSITY TEST

	Question	Answer
1	Why is the processing activity important to the Controller?	The processing activity is important to the Vet Practice as it helps improve the services proved to the clients and in doing so will increase the number of satisfied clients.
2	Why is the processing activity important to other parties the data may be disclosed to, if applicable?	Not applicable.
3	Is there another way of achieving the objective?	Direct Mail – would be expensive to send and collate results. Email – poorer response rates and more expensive to collate and report on the data.

C) THE BALANCING TEST

	Question	Answer
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1	Would the individual expect the processing activity to take place?	Yes. These are active clients of the Vet Practice seen recently. They would expect the Practice to use a range of approaches to help improve the quality of the services offered to clients.
2	Does the processing add value to a product or service that the individual uses?	Yes. It provides the clients with the opportunity to help shape the service offered to them.
3	Is the processing likely to negatively impact the individual's rights?	NO
4	Is the processing likely to result in unwarranted harm or distress to the Individual?	No. It is restricted to current active clients who regularly visit the practice.
5	Would there be a prejudice to Data Controller if processing does not happen?	NO
6	Would there be a prejudice to the Third Party if processing does not happen?	NO
7	Is the processing in the interests of the individual whose personal data it relates to?	Yes, as it provides them with an opportunity to share their views and ideas in ways to improve the running of the practice.
8	Are the legitimate interests of the individual aligned with the party looking to rely on their legitimate interests for the processing?	Yes
9	What is the connection between the individual and the organisation?	Individual is a current client of the Vet Practice.
10	What is the nature of the data to be processed? Does data of this nature have any special protections under GDPR?	Customer's personal details from the Vet Practice. This has no special protection under GDPR
11	Is there a two-way relationship in place between the organisation and the individual whose personal information is going to be processed? If so how close is that relationship?	NO
12	Would the processing limit or undermine the rights of individuals?	NO
13	Has the personal information been obtained directly from the individual, or obtained indirectly?	The personal data of the Customer has been directly obtained by the Vet Practice.
14	Is there any imbalance in who holds the power between the organisation and the individual?	Individuals are clients of the organisation
15	Is it likely that the individual may expect their information to be used for this purpose?	Yes, as it is related to obtaining their views regarding services the Vet Practice offers.
16	Could the processing be considered intrusive or inappropriate? In particular, could it be	



	perceived as such by the individual or in the context of the relationship?	No. The client is made aware of the purpose of the survey and is not mandated to complete it.
17	Is a fair processing notice provided to the individual, if so, how? Are they sufficiently clear and up front regarding the purposes of the processing?	The purpose of the processing is clear and upfront
18	Can the individual, whose data is being processed, control the processing activity or object to it easily?	The clients of the Vet Practice are under no obligation to complete the survey.
19	Can the scope of the processing be modified to reduce/mitigate any underlying privacy risks or harms?	The survey is sent only to current clients regularly attending the Vet Practice.

D) SAFEGUARDS AND COMPENSATING CONTROLS

Data is sent to a third party for processing. There is a Data Protection Agreement in place between the Vet Practice and a Third Party, VetsTxt which is signed by both parties. This explains how data is managed by VetsTxt on behalf of the Vet Practice. Data is kept for an appropriate period as agreed with the Data Controller. The data processor produces a report for the data controller.

E) REACHING A DECISION AND DOCUMENTING THE OUTCOME

Legitimate Interest is an appropriate legal basis for processing the data for this campaign because;

- Individuals receiving it are current active clients of the Vet Practice
- The survey is concerned with obtaining their views on the service the Vet Practice provides which is key to helping the Practice improve. This makes this processing an allowable Legitimate Interest
- An SMS based survey is the most appropriate method of processing as it ensures a greater response than other processes. It also allows customer to complete the survey in private
- Individuals are under no obligation to complete it.
- The campaign is unobtrusive and does not create waste.

Outcome of Assessment: ✓

Signed by: *[Signature]*

Role: MANAGING PARTNER

Dated: 30/07/19

Review date: 30/07/20