

LEGITIMATE INTEREST ASSESSMENT

PART 1

Date of the assessment	05 October 2023
Who is carrying out the assessment?	John Biggs
Controller organisation	John & Georgina Biggs trading as Bellavista Homes
Data Protection Officer (DPO)	John Biggs
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?	We collect data from the public domain including the Land Registry to identify owners of property in the UK. We use this data to communicate with owners to offer them the opportunity to work with us to release value from their properties. Any indefinable data is only used for this purpose.
Benefits	
What are the benefits you expect to gain from the processing?	<ul style="list-style-type: none">The processing of data will help us identify owners who may be able to benefit financially from working with us.
Will any third parties benefit from the processing?	No
Are there any wider public benefits to the processing?	No
How important are these benefits?	The benefits of processing this data are that we are able to personalise our communications with owners to make them aware of the possible benefits of working with us.
Impact	
What would be the impact if the processing could not go ahead?	We would not be able to communicate with the owners and they would miss out on the possible financial benefits of working with us.
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).
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 This particular area of our work would not be possible without processing this data.
Is the processing proportionate to your purpose?	Yes The data we collect is limited to that available in the public domain, normally the Land Registry. The data we collect is limited to the names and addresses of the individuals, or in the case of company owned properties, the names and addresses of the Directors.
Can you achieve the same purpose without the processing?	No This project relies on contacting individual owners. There is no other way of identifying and contacting them without processing this data.
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 The data we collect is limited to owners names and address. It is not possible to reduce the amount of data collected further if the project is to continue to function.

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 and personal capacity
Reasonable expectations	
Do you have an existing relationship with the individual whose data is being processed?	No
Source of the personal data	From the public domain, mainly the Land Registry and Companies House.
How did you tell about and explain to the individual the use of their data when it was first collected?	N/A
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	
What are the potential risks of the processing and what are the likelihood and severity of any potential risks?	Individuals objecting to receiving an unsolicited mailing. <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"> • All letters will carry information explaining how to opt out of future mailings and how to have data removed from our systems.
Can individuals opt-out of the processing?	Yes

PART 5 - DECISION

Can you rely on legitimate interests for this processing?	Yes
Next review date	05 October 2024