

UKlifestories - Legitimate Interests Assessment

Dominic Griffin (“DM”), as the applicable data controller and owner and operator of the UKlifestories website (“Website”), has completed this legitimate interest assessment (“LIA”) in order to justify their processing of personal data for the purposes described herein on the lawful basis contained in Art. 6 (1) (f) UK GDPR. DM will keep this LIA under ongoing review.

Part 1: Purpose of Processing

No.	Question	Response
1.	Why do you want to process the data?	DM wishes to publish stories (“Stories”) on the Website which they become aware of in their line of work in the care industry and which are submitted to them for submission to the Website. The Stories will consist of personal stories told by the subject or close contacts (including, family members, friends and close acquaintances) of the subject (“Contacts”) which, if not published on the Website, DM is concerned will be forgotten. As such, personal data relating to the subject and Contacts will be contained within the Stories and, therefore, processed for the purposes of publishing the Stories on the Website (“Purpose”).
2.	What benefit do you expect to get from the processing?	DM wishes to share the Stories with the wider public in order to preserve the subject’s legacy and memory and, if possible, provide some comfort to the public and the Contacts.
3.	Do any third parties benefit from the processing?	The wider public and the Contacts.
4.	Are there any wider public benefits to the processing?	Yes, DM hopes to provide comfort to the wider public when sharing the Stories.
5.	How important are the benefits that you have identified?	Important
6.	What would the impact be if you couldn’t go ahead with the processing?	There would be limited economic or commercial impact but given the sentimentality attached to the Purpose, the emotional impact would not be insignificant.
7.	Are you complying with any specific data protection rules that apply to your processing (e.g. profiling requirements, or e-privacy legislation)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8.	Are you complying with applicable industry guidelines or codes of practice?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.	Are there any other ethical issues with the processing?	There is a risk that Contacts or other members of the public may not be aware of the publication of the Stories on the Website or the facts contained within the Stories and be upset, offended or distressed by that publication.

Part 2: Necessity of Processing

No.	Question	Response
10.	Will this processing actually help you achieve your purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11.	Is the processing proportionate to that purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12.	Can you achieve the same purpose without the processing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The Purpose can only be meaningfully achieved if the Stories are published on the (publicly available) Website. The essence of the Purpose is to provide comfort through sharing Stories about the subjects.
13.	Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?	DM will ensure that each Story published contains as little personal data as possible without undermining the telling of the Story itself.

Part 3: Balancing Test

No.	Question	Response
Nature of the Personal Data		
14.	Is it special category data or criminal offence data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15.	Is it data which people are likely to consider particularly 'private'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Personal data will likely relate to familial or personal circumstances which only the subject or the Contacts would be aware of.
16.	Are you processing children's data or data relating to other vulnerable people ¹ ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Personal data will likely relate to elderly people, and may relate to children.
17.	Is the data about people in their personal or professional capacity?	Personal
Reasonable Expectations		
18.	Do you have an existing relationship with the individual?	DM will have an existing relationship with some of the data subjects.
19.	What's the nature of the relationship and how have you used data in the past?	The nature of the relationship would be a professional or working relationship. Otherwise, Stories may be submitted directly to the Website for publication, in which case, there is no existing or prior relationship between DM and the data subjects.
20.	Did you collect the data directly from the individual? What did you tell them at the time?	Some of the personal data will be collected directly from a data subject referenced in the Story, for example, a sibling of the subject may submit a Story to DM for publication on the Website. However, some of the personal data will relate to data subjects which are referenced in the Story but which did not submit the Story to DM for publication.
21.	If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?	DM does not envisage that any personal data will be collected from a third party.
22.	How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?	Data collection is ongoing.
23.	Is your intended purpose and method widely understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
24.	Are you intending to do anything new or innovative?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
25.	Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
26.	Are there any other factors in the particular circumstances that mean they would or would not expect the processing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Likely Impact		
27.	What are the possible impacts of the processing on people?	It is possible that there would be an emotional impact on the data subjects referenced in the Stories and, perhaps, to individuals not referenced in

¹ According to the ICO, "Individuals can be vulnerable where circumstances may restrict their ability to freely consent or object to the processing of their personal data, or to understand its implications", for example, children, elderly people or people with disabilities.
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		the Stories but who know or knew the subject or Contacts and who read the Stories on the Website.
28.	Will individuals lose any control over the use of their personal data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If DM becomes aware of any objections relating to the publication of the Story, DM will edit the Story or remove it from the Website where possible.
29.	What is the likelihood and severity of any potential impact?	The likelihood is medium given the potential sentimentality of the Story but the severity is low given the ability to edit or remove Stories from the Website.
30.	Are some people likely to object to the processing or find it intrusive?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No There is a small possibility that data subjects will object to the processing or find it intrusive given the personal nature of the Stories and the possibility that the subject may have passed away. However, DM believes that the safeguards referenced in this LIA will mitigate those risks significantly.
31.	Would you be happy to explain the processing to individuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No DM plans to imminently publish a privacy policy on its website to explain to all applicable data subjects how it will process their personal data in accordance with Arts. 13 and 14 UK GDPR.
32.	Can you adopt any additional safeguards to minimise the impact?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The processing will be kept under regular review and any appropriate safeguards identified will be implemented.
33.	Can you offer individuals an opt-out?	It is possible to offer data subjects an opt-out but this is not planned before publication on the Website.

Part 4: Decision

Can you rely on legitimate interests for this processing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Do you have any comments to justify your answer?</p> <p>Given the sentimentality of the Purpose, it is possible that there would be an emotional impact on the data subjects referenced in the Stories. However, if DM becomes aware of any objections relating to the publication of the Story, DM will edit the Story or remove it from the Website where possible. Additionally, DM will imminently publish a privacy notice on the Website in order to transparently inform data subjects about the processing of their personal data for the Purpose. As such, the data protection rights, freedoms and interests of the data subjects do not override the legitimate interests of DM, as the data controller, in processing for the Purpose.</p>	
LIA completed by	Dominic Griffin
Date	17.11.2025