

ALPHA WATER HYGIENE – LEGITIMATE INTEREST ASSESSMENT

Data is collected by Alpha Swanson Ltd for the purpose of training and registering candidates per their wishes.

Alpha Swanson Ltd market EUSR Water Hygiene and SHEA Water Passport training via its dedicated website, <https://alphawaterhygiene.co.uk/> as well as through direct telephone or email contacts.

Under the GDPR regulations, Alpha Swanson has identified "Legitimate Interest" as the lawful basis for processing this data.

What is the 'legitimate interests' basis?

Article 6(1)(f) gives a lawful basis for processing where:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

The following Legitimate Interest Assessment has been conducted:

We have checked that legitimate interests is the most appropriate basis.

- We understand our responsibility to protect the individual's interests.
- We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
- We have identified the relevant legitimate interests.
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
- We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests.
- We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.
- We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.
- If we process children's data, we take extra care to make sure we protect their interests.
- We have considered safeguards to reduce the impact where possible.

- ✓ We have considered whether we can offer an opt out.
- ✓ If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA.
- ✓ We keep our LIA under review, and repeat it if circumstances change.
- ✓ We include information about our legitimate interests in our privacy information.

Date Last Reviewed 28/02/2022

Clive Cuthbertson - Director

A handwritten signature in black ink, appearing to be 'Clive Cuthbertson', written in a cursive style.