

Datagraphic

Legitimate Interests Assessment (LIA)

2025



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Document Information

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Approved by:	Suzanne Beech – Marketing Director

This document is:

- Effective from the Version and Issue date above. It supersedes previous versions, which are withdrawn and hard copies destroyed.
- Effective for Datagraphic Limited and Datagraphic Group Limited (Herein referred to as “Datagraphic”).
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- Subject to change by Datagraphic in line with changes in statutory law, case law and best practice.



Legitimate Interests Assessment (LIA)

To comply with UK GDPR, Datagraphic has carried out a Legitimate Interests Assessment (LIA), which is documented below.

Please note that this LIA relates to data captured, processed and stored by Datagraphic as a Controller for Personal Data used in the marketing and sales activities of its products and services. It is not an LIA for Personal Data supplied to Datagraphic (as a Processor) by clients (as the Controllers).

Definitions

For this LIA, the following terms have the meanings given in the UK GDPR:

- **Controller** – A company, natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the Personal Data processing.
- **Processor** – A company, natural or legal person, public authority, agency or anybody (other than a Controller's employee) who processes Personal Data for the Controller.
- **Data Subject** – An individual whose Personal Data is processed.
- **Personal Data** – Information relating to an identified or identifiable Data Subject.
- **Processing** – Any operation performed on Personal Data, such as collection, storage, use, or deletion.
- **Breach** – A security incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data.
- **Applicable Law** – Compliance with Data Protection Laws

Datagraphic complies with all Applicable Laws and ensures that Personal Data is processed lawfully, fairly, and transparently. We follow appropriate measures to uphold data protection principles and safeguard the rights of Data Subjects.



Processing Purpose

Datagraphic has a legitimate interest in Processing Personal Data relating to decision makers/influencers and budget holders in UK organisations for:

- marketing of its products and services to clients or potential clients to create and nurture business relationships with potentially mutual benefits
- retention of a suppression list to ensure we comply with Data Subjects' right to object to Datagraphic's Processing of their data.

The Processing is necessary to share relevant industry and role-based insights. To show that Datagraphic is a thought leader in the Data Subject's industry/field of expertise and to generate, engage, and nurture sales leads.

Following the positive outcome of the Balancing Test below, Datagraphic's Processing is a legitimate activity as identified in the UK GDPR Article 6 and PECR ePrivacy Regulation.

Processing this Personal Data is a critical business activity for Datagraphic to target sales leads appropriately.

The Personal Data processed is only shared within Datagraphic. Unless legally required, we do not disclose data to third-parties, as set out in our Privacy Policy.

Is Processing Necessary?

Datagraphic is a small-medium organisation that provides products and services to help decision influencers/makers and budget holders improve productivity within their organisation or department. Our sales and marketing activities follow a Business-to-Business (B2B) model.

By Processing this data for clearly identified B2B contacts, we can personalise marketing and sales content and deliver more relevant information, which is necessary to generate engagement with the Data Subject.

Therefore, it is necessary to process role-specific Personal Data to market and sell our services. This has to be sourced manually or from UK GDPR-compliant data providers. There is no other way to source this contact information.



The Balancing Test

The Data Subjects are business people with decision-making/ influencing and budgetary responsibilities. They can reasonably expect to be contacted with marketing and sales content relating to their professional roles.

During the marketing and sales process, we make clear to the Data Subject that we will process their data to share this relevant information with them. It is information they can use in their professional role to help meet the objectives of their department/organisation.

We make clear in communications with the Data Subject that they control the data we process and can exercise their rights under UK GDPR at any time. If a Data Subject requests that their information be removed from our database, it is suppressed and cannot be added back. This Processing will not likely negatively impact the Data Subject's interests and/or rights.

In the unlikely event of a breach, the impact on the Data Subject would be low based on the type of data we process.

The data is limited to names of decision makers/influencers and budget holders, their job titles, their organisations' addresses, telephone numbers and the Data Subject's business email addresses. Should the Data Subject engage with us, information will also be extended to notes in our secure CRM system regarding those interactions. This is to help deliver a more relevant service and respond effectively to the Data Subject's future needs and queries.

If the Data Subject leaves their role, their name and contact details are deleted from our database as soon as possible.

Governance

The Data Subject's information is processed by Datagraphic, a secure ISO 27001 certified organisation. Information Security policies and procedures are in place to protect the data we process. All staff also receive regular Information Security Awareness Training.

Conclusion

On reviewing the Balancing Test and information here, Datagraphic believes it can use Legitimate Interest as a lawful basis for data Processing.



Document History

Date	Version	Author	Description of change
24/03/2022	1.1	S Beech	Review and publishing of this document as part of compliance with the EU GDPR.
18/03/2025	1.2	S Beech	Reviewed the document content in line with the 3-year review policy. Amended EU GDPR references to UK GDPR and checked that LIA is still relevant and compliant.



Questions

If you have questions about the contents of this LIA, please contact:

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Datagraphic

Certified



Corporation

Registered companies:

Datagraphic Group Limited (Reg No: 01215380) and Datagraphic Limited (Reg No: 02913191).

Both registered in England at: Ireland Industrial Estate, Adelphi Way, Staveley, Chesterfield, S43 3LS.

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