

# Datagraphic

## Legitimate Interests Assessment

V1.1 – January 2022



# Legitimate Interests Assessment

To comply with GDPR, Datagraphic has carried out a Legitimate Interests Assessment (LIA) documented below. Please note this assessment relates only to data captured, processed and stored for the marketing and sales of Datagraphic products and services. It is not an assessment for data supplied by clients (as the Data Controllers) to Datagraphic (as the Data Processors).

## Purpose of processing

Datagraphic has a legitimate interest in processing personal data relating to decision influencers/makers and budget holders in UK organisations, for:

- marketing of our 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 our data subjects' right to object to the processing of their data

The processing is necessary to share relevant industry and role-based insights. To show Datagraphic is a thought leader in the data subject's industry/ field of expertise and 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 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 Group Limited and Datagraphic Limited. Unless legally required to do so, we don't 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 GDPR compliant data list providers. There is no other way to source this contact information.

## The balancing test

The data subjects are business people with decision influencing/making 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 marketing and sales information with them. This information they can use in their professional role to help meet the objectives of their department or organisation.

We make clear in communications with the data subject that they are in control of the data we process and can exercise their rights at any time. If a data subject requests their information is removed from our database, it is suppressed and cannot be added back.

This processing is not likely to negatively impact the data subject's interests and/or rights. In the unlikely event of a breach, the impact to the data subject would be low: based on the type of data we process.

The data is limited to names of decision influencers/makers 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 extend to notes in our secure CRM system of 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.

## 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 receive regular Information Security Awareness Training.

## Conclusion

On reviewing the balancing test and information set out here, Datagraphic believes it can use Legitimate Interest as a lawful basis for data processing.

# Questions

If you have questions about any of the content, please contact:

Suzanne Beech – Marketing Director

T: +44 (0)1246 543000

E: [marketing@datagraphic.co.uk](mailto:marketing@datagraphic.co.uk)

W: [datagraphic.co.uk](http://datagraphic.co.uk)

## Datagraphic

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.

This LIA is regularly reviewed by Datagraphic and is subject to change.

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