

**METROPOLITAN BUSHEY BOWLS CLUB  
LEGITIMATE INTERESTS ASSESSMENT**

There are three lawful bases for processing data, one of which must be chosen to comply with the General Data Protection Regulation (GDPR).

- Consent
- Necessary for the performance of a contract
- Legitimate interests

MBBC has chosen to use “Legitimate Interest” and therefore needs to conduct a Legitimate Interest Assessment (LIA). This requires MBBC to identify a legitimate interest, show what processes are necessary to achieve it and balance it against the individual’s interests, rights and freedoms. A copy of this LIA will be kept on record and reviewed annually as part of MBBC’s general policy review. Details of Legitimate Interests must be included in the MBBC’s privacy notice.

| <b>As an organisation METROPOLITAN BUSHEY BOWLS CLUB has checked the following:-</b>                                                              | <b>Tick</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| We have checked that legitimate interest is the most appropriate basis.                                                                           | ✓           |
| We understand our responsibility to protect the individual’s interests.                                                                           | ✓           |
| We have conducted a legitimate interest 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 individual’s data in ways they would reasonable 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.                                                        | N/A         |
| We have considered safeguards to reduce the impact where possible.                                                                                | N/A         |
| 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 (Data Protection Impact Assessment) | N/A         |
| We keep our LIA under review, and repeat it if circumstances change.                                                                              | ✓           |
| We include information about our legitimate interests in our privacy information.                                                                 | ✓           |

**Data MBBC use about their Members**

| <b>Data Type</b>       | <b>Purpose</b>                                                                        | <b>Do we need it?</b>                                     | <b>Who might we share it with?</b>                                                                                                                                                                                                                                                                   |
|------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Surname and First name | Used to identify the member in communications by post, email, telephone or in person. | Yes. Communication is paramount for the club to function. | Data shared with the Hon. Secretary is shared with other club members and printed in the fixture card. Committee members also have their contact details placed on the website and printed on the fixture card. The fixture card is distributed to club members and Match Secretaries of some clubs. |

|                              |                                                                                                                                   |                                                                                                                                             |                                                                    |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Postal address               | Used by the Hon. Secretary to send information to those members not on email.                                                     | As above.                                                                                                                                   | As above                                                           |
| Email                        | Used by the Hon. Secretary and Hon. Competition Secretary to send information to club members.                                    | As above                                                                                                                                    | As above                                                           |
| Phone numbers                | Used by all members to contact other members or provide or request information.                                                   | As above                                                                                                                                    | As above                                                           |
| Bowls Club                   | Used by all members to identify the bowls club that they represent.                                                               | As above                                                                                                                                    | As above                                                           |
| Role                         | Used to identify the role that the data subject performs within the club e.g. Treasurer, President etc.                           | As above                                                                                                                                    | As above                                                           |
| Health & medical information | Information on health will only be held at the expressed wish of the individual and only shared with the individual's permission. | Optional but beneficial if immediate medical intervention is required for individuals living with life threatening conditions or allergies. | Members on a 'need to know' basis as instructed by the individual. |

#### **Data MBBC use about Competitors and held by the Hon. Competition Secretary**

| <b>Data Type</b>       | <b>Purpose</b>                                                                        | <b>Do we need it?</b>                                       | <b>Who might we share it with?</b>                                         |
|------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------------------------|
| Surname and First name | It enables the Hon. Competition Secretary to produce data necessary for competitions. | Yes otherwise it would not be possible to run competitions. | A list of competitors appears on the club notice board and on the website. |
| Phone numbers          | As above                                                                              | As above                                                    | As above                                                                   |
| Email                  | As above                                                                              | As above                                                    | As above                                                                   |
| Competitions entered   | As above                                                                              | As above                                                    | As above                                                                   |

#### **Data MBBC use about the players and held by the Captain and Selection Committee**

| <b>Data Type</b>       | <b>Purpose</b>                                                                                                           | <b>Do we need it?</b>                                                                  | <b>Who might we share it with?</b>                                                        |
|------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Surname and First name | It enables the Captain & Selection Committee to produce a list of players that have made themselves available for games. | Yes. We need to establish who has made themselves available in order to select a team. | Other club members. Team lists are displayed on the club notice board and on the website. |