



# Legitimate Interest's Assessment for St Pauls Veterinary Clinic Parasiticide Campaign

This document is a requirement of the General Data Protection Agreement (GDPR)  
May 2018

## A) IDENTIFYING A LEGITIMATE INTEREST

	Question	Answer
1	What is the purpose of the processing operation?	To raise awareness of the importance of compliance to parasiticide treatments for selected clients within the practice.
2	Is the processing necessary to meet one or more specific organisational objectives?	A key objective of the Vet Practice is to increase the number of dogs and cats taking preventative treatments such as parasiticides. The processing will increase the number of pets being wormed in line with worming protocols.
3	Is the processing necessary to meet one or more specific objectives of any Third Party?	No



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Does the GDPR, e-Privacy Regulation or other national legislation specifically identify the processing activity as being a legitimate activity, subject to the completion of a balancing test and positive outcome?

The communication is used for direct marketing purposes for the Vet Practice therefore as mentioned in Recital 47\* it is the legitimate interest.

\* "The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest".



B) THE NECESSITY TEST		
	Question	Answer
1	Why is the processing activity important to the Controller?	The processing activity is important to the Vet Practice as it increases compliance of parasiticide treatments by those targeted and in doing so increases the volume of treatments sold.
2	Why is the processing activity important to other parties the data may be disclosed to, if applicable?	Not applicable.
3	Is there another way of achieving the objective?	Direct Mail - would be very expensive and ineffective. Email - poor delivery rates and lack of email addresses make this ineffective.



C) THE BALANCING TEST		
	Question	Answer
1	Would the individual expect the processing activity to take place?	Yes. The individual has registered their pet with the Vet Practice and would expect communication on matters pertaining to the Health of their pet.
2	Does the processing add value to a product or service that the individual uses?	Yes, as it raises awareness in the pet owner about the importance of frequent worming for their pet.
3	Is the processing likely to negatively impact the individual's rights?	No
4	Is the processing likely to result in unwarranted harm or distress to the Individual?	No
5	Would there be a prejudice to Data Controller if processing does not happen?	No
6	Would there be a prejudice to the Third Party if processing does not happen?	Yes. Significant numbers would not be advised of the offer and therefore miss out on the benefit.
7	Is the processing in the interests of the individual whose personal data it relates to?	Yes, as it is related to the health of their pet as well as to their own health and that of their family.
8	Are the legitimate interests of the individual aligned with the party looking to rely on their legitimate interests for the processing?	Yes
9	What is the connection between the individual and the organisation?	Individual is a current client of the Vet Practice
10	What is the nature of the data to be processed? Does data of this nature have any special protections under GDPR?	Clients personal details from the Vet Practice. This has no special protection under GDPR
11	Is there a two-way relationship in place between the organisation and the individual whose personal information is going to be processed? If so how close is that relationship?	No
12	Would the processing limit or undermine the rights of individuals?	No



13	Has the personal information been obtained directly from the individual, or obtained indirectly?	The personal data of the clients have been directly obtained from the Vet Practice.
14	Is there any imbalance in who holds the power between the organisation and the individual?	No
15	Is it likely that the individual may expect their information to be used for this purpose?	Yes, as it is related to the health of their pet and they are registered with the Vet Practice for such matters.
16	Could the processing be considered intrusive or inappropriate? In particular, could it be perceived as such by the individual or in the context of the relationship?	No. The campaign concerns products that will improve the health of the client's pet.
17	Are they sufficiently clear and up front regarding the purposes of the processing?	The purpose of the processing is clear and up front.
18	Can the individual, whose data is being processed, control the processing activity or object to it easily?	The client of the Vet Practice can easily opt-out from future communications by replying to the communication.
19	Can the scope of the processing be modified to reduce/mitigate any underlying privacy risks or harms?	This has already been done.



## D) SAFEGUARDS AND COMPENSATING CONTROLS

The message sent to each individual has been assessed by the Pharmaceutical company sponsoring this campaign to ensure that they comply with the requirements of the National Office of Animal Health (NOAH).

Data is sent to a third party for processing. There is a Data Protection Agreement in place between the Vet Practice and a Third Party, VetsTxt which is signed by both parties. This explains how data is managed by VetsTxt on behalf of the Vet Practice and ensures that this data will only be used for the purposes laid down by the Vet Practice and deleted thereafter.

## E) REACHING A DECISION AND DOCUMENTING THE OUTCOME

Legitimate Interest is an appropriate legal basis for processing the data for this campaign because:

- The message being sent is educational and will encourage Pet owners to worm their Pets.
- Worming compliance will lead to healthier Pets, a core aim of the Vet Practice.
- The campaign is classified as Direct Marketing which is an allowable Legitimate Interest
- The campaign is run for a limited period therefore the data processing allows significantly more clients to be made aware of the information included in the campaign than if this information was not communicated to customers.
- Individuals receiving it are current clients of the Vet Practice.
- SMS is the most appropriate method of processing as it ensures the greatest number of individuals are contacted and generates a greater response than other processes.
- Individuals can opt-out easily from future campaigns.
- The campaign is unobtrusive and does not create waste.

**Outcome of Assessment:**

**Signed by:**

**Role:**

**Dated:**

**Review date:**