

This legitimate interests assessment (LIA) template is designed to help decide whether or not the legitimate interests basis is likely to apply to the processing. It should be used alongside the ICO's [legitimate interests guidance](#).

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

Why do you want to process the data?
Guests attending ceremonies at the Register Office, Llwynegrin Hall, Mold.
What benefit do you expect to get from the processing?
The contact details (name and contact telephone number) of all guests attending a ceremony will be recorded. This information will be used in the event any of those present at the ceremony subsequently test positive for COVID-19 so all attendees can be notified to self-isolate as per Government guidelines.
Do any third parties benefit from the processing?
N/A
Are there any wider public benefits to the processing?
Public Health emergency and this is a control measure to prevent the spread further. Significant public interest in reducing the spread of the virus.
How important are the benefits that you have identified?
Global pandemic, extremely vital that the spread of the virus is contained.
What would the impact be if you couldn't go ahead with the processing?
Guests would not be permitted to attend the ceremony. The collection of the data forms part of the control measures that allow guests to attend.
Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
N/A
Are you complying with other relevant laws?
The requirement to collect this data is not prescribed in any legislation.
Are you complying with industry guidelines or codes of practice?

The collection of this type of data is becoming standard practice as part of the national response to containing the spread of the virus.

Are there any other ethical issues with the processing?

No – information is limited to name and contact telephone number. The ability to allow guests to attend is dependent on control measures to protect those in attendance.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

Will this processing actually help you achieve your purpose?
Yes – should any of those in attendance test positive for COVID-19, it will allow the other persons present to be alerted quickly to the risk and to self-isolate in line with Government guidelines. Without this information there would not be a quick way to contact everyone which could lead to the virus being spread further.
Is the processing proportionate to that purpose?
Yes – only name and contact telephone number collected.
Can you achieve the same purpose without the processing?
No. Time is of the essence to prevent the spread of the virus, any delays could see the virus being spread.
Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?
Minimal data is collected and will only be used if anyone present tests positive for COVID-19.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

Is it special category data or criminal offence data?
No.
Is it data which people are likely to consider particularly 'private'?
No. A public record is maintained for all ceremonies. Attendance at a ceremony is not generally considered a private matter and is often documented by a photographer.
Are you processing children's data or data relating to other vulnerable people?
Only name and contact telephone number is collected. There would be no way to determine the age or other personally identifiable information.
Is the data about people in their personal or professional capacity?
Personal.

Do you have an existing relationship with the individual?
No.
What's the nature of the relationship and how have you used data in the past?
N/A
Did you collect the data directly from the individual? What did you tell them at the time?
The information will be supplied by the couple who booked a ceremony. A privacy notice is provided prior to the information being collected.
If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?
N/A

How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
N/A
Is your intended purpose and method widely understood?
Yes – public understand that collecting this information forms part of the control measures to control the spread of the virus.
Are you intending to do anything new or innovative?
No
Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?
No direct consultation but there is a belief that the public would expect all necessary steps are taken to control the spread of the virus and to keep those in attendance safe.
Are there any other factors in the particular circumstances that mean they would or would not expect the processing?
Public would expect all necessary steps are taken to control the spread of the virus and to keep those in attendance safe.

What are the possible impacts of the processing on people?
Early warning that they could be at increased risk of infection. Wider impact on the public that those who need to self-isolate are notified at the earliest opportunity.
Will individuals lose any control over the use of their personal data?
No – the information will only be used in the eventuality that someone in attendance at the ceremony tests positive for COVID-19.
What is the likelihood and severity of any potential impact?
N/A
Are some people likely to object to the processing or find it intrusive?

The public will understand why the information is being collected for the very specific reasons documented.
Would you be happy to explain the processing to individuals?
Yes – information provided in the privacy notice.
Can you adopt any safeguards to minimise the impact?
Access to the data is restricted to staff working within the Registration Service. Information will only be used in the event of a positive test for COVID-19. The information will only be held for one month and then deleted.

Can you offer individuals an opt-out?	No
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Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer? (optional)	
There is an obligation to protect those present at ceremonies and this is one control measure. There is a much wider public interest in halting the spread of the virus. The information collected has been limited to the minimum necessary to achieve the objectives. Access is restricted and the information is only held for one month. The collection of the data is proportionate and justified in the face of a public health emergency.	
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