

B: Legitimate Interests Assessment:

Legitimate Interests Assessment (LIA)

Purpose: To assess whether it is lawful, necessary, and proportionate to share members' personal data with a third-party secure voting system to facilitate participation in an Annual / Emergency General Meeting (A/EGM).

1. Purpose of the Processing

What do you want to do with the data?

We intend to share members' first name, last name, email address, and membership number with a verified third-party online voting provider. This will enable secure and authenticated voting during the A/EGM, ensuring that only eligible members participate in voting on important organisational matters.

Why do you need to process this data?

The data is required to:

- Authenticate and verify members' eligibility to vote.
- Enable secure delivery of personalised voting credentials.
- Ensure accurate recording and reporting of votes aligned to membership records.

This is essential for fulfilling the organisation's governance obligations and ensuring members can exercise their democratic rights within the organisation.

2. Legitimate Interests

What is the legitimate interest being pursued?

- Enabling proper governance and accountability through the A/EGM.
- Facilitating democratic member participation in organisational decisions.
- Protecting the integrity and security of the voting process.
- Complying with any constitutional or legal obligations to hold an A/EGM and conduct votes.

These interests are central to the functioning of a membership organisation and align with members' reasonable expectations.

3. Necessity Test

Is the processing necessary for that purpose?

Yes. The third-party voting platform requires specific member identifiers to securely authenticate users and deliver voting access.

- First name and last name: for individual identification.
- Email address: to deliver unique voting access links.
- Membership number: to confirm eligibility and prevent duplicate voting.

Without processing this data, members would not be able to securely vote online, undermining the EGM's legitimacy and members' rights.

4. Balancing Test

Would the processing cause unwarranted harm to individuals' rights and freedoms?

- Risk of harm is low, as only limited, necessary data is shared. No sensitive ("special category") data is involved.
- Data is transferred securely under a contract with the provider, which is compliant with UK GDPR Article 28 obligations (Data Processing Agreement in place).
- The provider has been assessed as secure and compliant with recognised standards.
- Members are informed of data sharing in the organisation's privacy notice.

Reasonable expectations of data subjects:

Members would reasonably expect their data to be used for participating in official governance processes, including A/EGMs and voting. Online voting, especially in modern, remote-first environments, is within these expectations.

Safeguards to protect individuals:

- Secure data transfer and storage by the third-party provider.
- Limitation on the use of data — solely for EGM voting.
- Data retention limits — data will not be kept longer than necessary.
- Members' rights (e.g., right to object, right of access) are respected and explained in the privacy notice.

5. Conclusion

The processing is lawful, necessary, and proportionate to pursue legitimate organisational interests. Members' rights are not overridden, and appropriate safeguards are in place. Therefore, sharing member data for A/EGM voting purposes is justified under the legitimate interests lawful basis (UK GDPR Article 6(1)(f)).

6. Review and Accountability

Date of assessment: [Insert Date]

Reviewed by (Data Protection Officer / Senior Responsible Officer): [Insert Name]

Next review date: [Insert Date, e.g., before next A/EGM]