
Legitimate Interest Assessment

1. Purpose of data processed

- 1.1. Data processed by Rail Business Daily is used for the sole purposes of delivering relevant news stories, industry knowledge and information on industry specific products/services.
- 1.2. Personal data processed will be Name or the recipient (in full), email address, name of business and contact preferences. This data will be used for the benefit of the receiver to ensure they are receiving key industry news and information.
- 1.3. We do not share any of this information with third-parties. All data processing is monitored by two, in-house ICO registered Data Controllers to ensure it is handled securely.
- 1.4. Rail Business Daily is a daily new platform and industry companion that prides itself on providing you breaking industry news and knowledge before anyone else. The use of collected data (listed in 1.2) allow us to provide our members breaking news which related directly to the rail industry.
- 1.5. Not being able to process this data due to a 'Right to be forgotten' request or similar would halt our ability to provide members with key news in real time which could directly impact on their business and wider industry.
- 1.6. We do not process any information relating to an individual's age, gender or ethnic background in accordance with our anti-profiling policy.

- 1.7. No data will be processed from individuals not deemed to be within the rail industry or without a direct interest in the industry
- 1.8. No information will be sent out that does not relate to the rail industry.

2. Necessity of data

- 2.1. We cannot deliver our services without the processing of this data as this allows us to send our members news and information, our core offering.
- 2.2. We collect only the data which is necessary to send you news and information on the rail industry and your contact preferences.
- 2.3. We ensure that we always obtain data in the least intrusive manner, if we can collect less data or collect data in a less intrusive manner without affecting services provided to our members we will always endeavour to do this.

3. Balancing of Data

- 3.1. Data collected is not deemed to be particularly personal as we always encourage use of work emails where possible and only ask for data related to an individual's role within the rail industry.
- 3.2. We collect no data deemed to be special category data by the ICO.
- 3.3. We do not collect any data from individuals deemed to be minors.
- 3.4. Data used is from individuals who have signed up directly via the Rail Business Daily web platform or through existing relationships.
- 3.5. Individuals will always be made aware of the purpose of data collection at the point of input and must opt-in. Individuals giving data offline will be made aware of the purpose of data collection and be given instruction on how to unsubscribe if they no longer would like to receive news and information.

4. Impact of data processing

- 4.1. Data processed is deemed to have minimal impact on those submitting it as data is related to their role in the rail industry and is not shared with any third parties.
- 4.2. Individual have the opportunity to opt-out at any time or request information on the personal data we have on them and how it is processed.

5. Evaluation

- 5.1. Based on balancing tests, Rail Business Daily and it's services are deemed to be sent on a legitimate interest basis. This will be reviewed quarterly to ensure that the legitimate interest assessment is still the best basis for processing data

Legitimate interest assessment was undertaken by Jamie Del Grosso on behalf of Rail Business Daily.

Signed



Date

23 / 05 / 2018
