

EXAMPLE OF A RECORD TO JUSTIFY PROCESSING PERSONAL DATA



GDPR Article 6 – Legal bases for processing personal data

GDPR Article 9 – Legal bases for processing special category data

PECR 2003 Regulation 22 – Legal basis for direct marketing through electronic mail

Data processed	Special category	Legal basis	Justification for processing personal data
Service user contact information: phone, email, address, name	No	Legitimate interests: GDPR Art.6, Para 1(f)	If we did not collect this data, we would not be able to provide a service to those seeking support from us. In order to be an effective organisation we need to be able to contact our service users.
Monthly donor newsletter: recipient name and email	No	Consent: GDPR Art.6, Para 1(a) PECR 2003 Reg.22	The donor newsletter contains marketing material. The first time someone donates they can opt-in to receive the donor newsletter by providing their name and email.
Event attendee access requirements	No	Legal obligation: GDPR Art.6, Para 1(c)	This data facilitates us providing equal access to any attendee, ensuring we comply with the Equality Act 2010.
Service user ethnicity	Yes	Consent: GDPR Art.9, Para 2(a)	We plan outreach interventions where monitoring shows ethnic groups are not well-represented. Service users choose voluntarily to disclose this data.
Employee national insurance numbers	Yes	Employment obligations: GDPR Art.9, Para 2(b)	In order to meet our rights and obligations in the field of employment as an employer, we need to collect this data.