

Compliance with the EU General Data Protection Regulation (GDPR) 2016/679

LEGITIMATE INTEREST ASSESSMENT

Introduction

The Asociación Vecinos Cooperando Y Colaborando de España is a not for profit organisation registered in the Madrid as having its own legal personality. Membership is entirely voluntary and free.

The Three Tests

1. *Purpose test*: are you pursuing a legitimate interest?

The overall purpose of the Asociación is to observe and inform the local police and bodies and forces of security of the state of actions, attitudes or situations presumed to be suspicious and therefore constitute alleged crime. With the objective of improving peace and the quality of life for all citizens resident in Spain. Security information is also communicated to members. All of the members join voluntarily to participate in or benefit from these purposes. Therefore, we are pursuing a legitimate interest that is shared with the membership with whom we communicate and who are the beneficiaries of our activities.

2. *Necessity test*: is the processing necessary for that purpose?

The only purposes of the data processing are:

- Administration of membership.
- Management of volunteers.
- Communication of information about news, events and activities related to living in the community of Spain.

In order for members to participate in their chosen activity they need to know the relevant information about topics mentioned in the previous paragraph. In order to achieve this we need to be able to contact the membership and limited processing of contact information is necessary.

3. *Balancing test*: do the individual's interests override the legitimate interest?

The interests of individual members are aligned and shared with the interests of the organisation as we all wish to enjoy or improve aspects of life in our community. Membership is entirely voluntary and members may leave at any time. Therefore, the legitimate interest of the organisation is not overridden by individual members' interests. The only data held is electronic contact details.

The processing of the data will update member's information base.

An information note has been issued to all members explaining their rights.

Conclusion

The Asociación Vecinos Cooperando y Colaborando de España is pursuing a legitimate interest, which is shared by the membership, it undertakes limited processing of personal data to facilitate communication with the membership and because of the voluntary engagement of the membership in a shared activity no member interests override the legitimate interest of the organisation.