

Legitimate Interests

Under the new data protection law starting in May 2018 we have a number of lawful reasons that we can use (or 'process') your personal information. One of the lawful reasons is called 'legitimate interests'.

Broadly speaking Legitimate Interests means that we can process your personal information if:

- We have a genuine and legitimate reason **and** we are not harming any of your rights and interests

So, what does this mean? When you provide your personal details to us we use your information for our legitimate business interests to carry out our work. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

Some typical examples of when we might use the approach are for preventing fraud, direct marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services, identifying usage trends and determining the effectiveness of our business approach.

Our interests

The following are some examples of when and why we would use this approach in our work:

- **Ordering online:** In order for us to process an order, payment has to be taken and contact information collected, such as name, delivery address and telephone number, provided. The seller would also need to record the transaction.
- **Your best interest:** Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
- **Personalisation:** Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers.
- **Analytics:** To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.
- **Due Diligence:** We may need to conduct investigations on customers, potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

We will also hold information about you so that we can respect your preferences for being contacted by us.

Your interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).