

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside our [legitimate interests guidance](#).

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

We are processing your data with the purpose of reaching the person responsible for tools and add-ins for Microsoft Office at your company. The benefit we expect from this is to be able to enter a dialogue with her/him. No third parties benefit from the processing. Entering dialogues with persons responsible for tools and add-ins at consulting companies and adjacent industries is essential for Ampler. If we were not able to enter these dialogues, Ampler would not be able to persist. We are complying with the applicable data protection rules, other relevant laws, industry guidelines, and codes of practice. The processing does not encompass other ethical issues.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

By processing your data we are able to get in contact with the person responsible for tools and add-ins for Microsoft Office at your company. We only process your data with the purpose of asking you (once) about this and do not process your data further. From experience, we are not able to reach the correct person without asking employees who use or would benefit from tools and add-ins for Microsoft Office. We only process your e-mail address, name, and position and would not be able to identify you as being relevant to contact or contact you with less data. We only process data from persons with positions matching those who benefits from using Ampler.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?
- Is the data about people in their personal or professional capacity?

The data is not special category data or criminal offence data. It is not data which people are likely to consider particularly 'private'. We are not processing children's data or data relating to other vulnerable people. The data about people is in their professional capacity.

Reasonable expectations

- Do you have an existing relationship with the individual?
- What's the nature of the relationship and how have you used data in the past?
- Did you collect the data directly from the individual? What did you tell them at the time?
- If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?
- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?

- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

We do not have an existing relationship with the individual. We have collected the data from LinkedIn and publicly available websites, e.g., company websites. The LinkedIn privacy policy states that 'Your profile is fully visible to all Members and customers of our Services.' The data has been collected within at least the last 3 months, but typically within a few days. We collect the data with the intention of reaching the person responsible for tools and add-ins for Microsoft Office at the company, with the purpose of entering a dialogue with her/him and demonstrating how Ampler can help the company. We are not intending to do anything new or innovate with the data. **Based on the LinkedIn privacy policy, members can reasonably expect that companies performing services relevant to them will contact them.** We only contact individuals which we have identified as our 'key segment', i.e., individuals that we know from experience benefit from our services.

Likely impact

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the impact?

<p>The individuals contacted will receive one mail from us unless they enter a dialogue. They will not lose any control over the use of their personal data and we do not share the data with any third parties. If we do not receive an answer, we want to ensure that we do not accidentally contact you more than once, and we therefore keep your data until we have established that Ampler is not a match for your company or until your company has entered a contract with us, upon which we only keep data on persons relevant to our contract. The severity of the impact of our data processing is very low; the individual receives one mail. It is unlikely that the processing will be considered intrusive. We are happy to explain our processing to individuals. We are minimizing the impact by not contacting the same person twice unless they enter a dialogue.</p>	
Can you offer individuals an opt-out?	Yes / No

Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes / No
<p>Do you have any comments to justify your answer? (optional)</p> <p>From experience, the only realistic way for us to get in contact with the person responsible for tools and add-ins for Microsoft Office at a company, is by asking employees to direct us to her/him. We only contact individuals, whom we are convinced will benefit from using Ampler, and we only contact them once unless they enter a dialogue. It is essential for Ampler to talk to the person responsible for tools and add-ins for Microsoft Office at the companies that constitute our 'core segment', i.e., those companies we have designed Ampler to help.</p>	
LIA completed by	Sune Høj Kjeldsen
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What's next?

Keep a record of this LIA, and keep it under review.