
Corporate Governance & Compliance
Policy, Procedures and Standards

Legitimate Interests Assessment

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Review and Update Policy

The document owner will review and update this Information Security Policy on at least an annual basis.

Contents

1. Scope	4
2. Legitimate Interests Assessment.....	4

1. Scope

The websites used for D&D London corporate and all restaurants websites that are used within and operated by D&D London.

2. Legitimate Interests Assessment

Area	Test	Response
The legitimate interest(s)	Who benefits from the processing? In what way?	We both benefit, as analysis of how and where you connect to our site means that we can improve it for you and optimise this to most customers browsers, platforms, languages and locations. We also use it to safeguard both you and us by recording your connection data should anything go wrong.
	Are there any wider public benefits to the processing?	Yes. In the detection and prevention of crime, we can provide law enforcement with enhanced information to help protect other websites and users on the wider internet.
	How important are those benefits?	We have an obligation to report crime and help the community at large prevent further crime or damage.
	What would the impact be if you couldn't go ahead?	We would remove our website from the public facing internet as we could not meet the requirement of confidentiality, integrity and availability of this service to our customers. This is of critical importance to us as we are required to keep this information for forensic investigation (for PCI DSS – and Article 40 code of conduct, and Article 42 certification / quality mark) should a breach occur.
	Would your use of the data be unethical or unlawful in any way?	No. We will use the data in two ways: <ol style="list-style-type: none"> 1. Pseudonymised for website stats to improve the website for users; 2. IP address and connection information for the detection and prevention of crime that would be shared with forensic investigators and/or law enforcement if a data breach or security incident with the website occurred.
Necessity test	Does this processing help to further that interest?	Yes. The analysis of how and where you connect to our site means that we can improve it for you and optimise this to most customers browsers, platforms, languages and locations. We also use it to safeguard both you and us by recording the data should anything go wrong. This way we can investigate and provide any relevant information to law enforcement.
	Is it a reasonable way to go about it?	Yes. These methods used by us are the same as for most global websites. Our security consultants recommend that we collect this data to be able to provide evidence should

		unauthorised access to our systems happen so that investigation can occur, and law enforcement can be provided with appropriate information.
	Is there another less intrusive way to achieve the same result?	No. We collect only the minimum level of information necessary to both improve and protect the website
Balancing test	What is the nature of your relationship with the individual?	There may or may not be a relationship with the individual. This will be unknown at the time of interaction and data collection.
	Is any of the data particularly sensitive or private?	No. The data that is collected is not overly sensitive from a data privacy standpoint. As every computer and device connected to the Internet is assigned an Internet Protocol (IP) address – which is recorded in most places you visit on the internet. The data from a security point of view could be quite sensitive and therefore, will be protected in line with Article 32 – technical and organisational security measures.
	Would people expect you to use their data in this way?	Yes. Analytics of this nature are used on most websites globally in the way that D&D London will use this information. Recording of logging and connection information is recommended by most global security best practice standards.
	Are you happy to explain it to them	Yes. This Legitimate Interest Assessment, documents our interests and can be provided to the data subject, representative or information commissioner on request.
	Are some people likely to object or find it intrusive?	People may object to this, and have the right to do so. Individuals always have the right not to use our website or our services.
	What is the possible impact on the individual?	We will know their IP address, which could reveal their approximate location to us. D&D London will also know specifics about the web browser and system that they have used to connect to us and their usage patterns on our websites, pages visited, length of time on the site etc. This data will be appropriately safeguarded to ensure it cannot be misused, and will not be used for any other purposes than stated.
	How big an impact might it have on them?	The impact will be low to the individual, unless they have committed a crime, at which point their data would be reported to law enforcement and other authorities like the ICO as appropriate.
	Are you processing children’s data?	Not knowingly. This is a corporate and restaurant website that is only designed for use by people with an interest in D&D London or the services that we offer. No service we

		offer is aimed at Children as an adult would be required to make a booking or interact with us.
	Are any of the individuals vulnerable in any other way?	This is possible but this will be unknown at the time of interaction. D&D London will take all responsible measures to comply with law, distance selling regulations and age identification as required.
	Can you adopt any safeguards to minimise the impact?	All safeguards in line with the requirements of the GDPR will be in place, and all data will be protected in line with Article 32 – technical and organisational security measures.
	Can you offer an opt-out?	Yes. It is possible for the individual to opt out of analytics information by using the Google Analytics opt-out Browser add-on that can be found at: https://support.google.com/analytics/answer/181881?hl=en . For other data collected by the webserver directly like the IP address and connection string there is no opt out that is offered for this information.