

GDPR BALANCING EXERCISE FOR DATA PROCESSING - MARKETING

Tommy's marketing newsletter

What activity are we assessing?	What is our interest?	What would the individual's reasonable expectations be?	Do the individual's interests or rights (eg privacy rights) over-ride our interest?	On balance, can we treat this as a 'legitimate interest'?
Emailing those who have historically signed up to the supporter newsletter and general communications from Tommy's within the last four years, and from whom we <u>do not</u> have documented evidence as to when and where they signed up for general communications from Tommy's	A key marketing communication opportunity to communicate to people our news, updates and campaigns To connect with supporters who have expressed interest in our organisation in the past.	To be informed of Tommy's news and updates	No as they have explicitly signed up for this communication	Yes
Emailing the newsletter to those who have signed up for general communications from Tommy's over four years ago, and from whom we <u>do not</u> have documented evidence as to when and where they signed up for general communications from Tommy's	A key marketing communication opportunity to communicate to people our news, updates and campaigns. To connect with supporters who have expressed interest in our organisation in the past.	To not be contacted if they have not interacted with Tommy's (determined by opening or responding to communications, or donating) for at least 4 years To have an opportunity to opt out of communication post May 2018 ahead of time.	Yes, they have the right to be forgotten	No
Emailing those who have previously 'referred a friend' and signed up their friends to receive the newsletter from Tommy's.	A key marketing communication opportunity to communicate to people our news, updates and campaigns	To not be contacted by any organisation that they themselves have not given their details to.	Yes	No
Emailing those who have opted out of receiving all communications from Tommy's, including the marketing newsletter, but are registered to run an event for us	To send an admin email to those participating in events to ensure they fulfil their contractual obligation.	To be given pertinent administrative information relevant to the activity they have committed to on behalf of Tommy's, in order to complete that event	No	Yes

The Pregnancy gestational emails

What activity are we assessing?	What is our interest?	What would the individual's reasonable expectations be?	Do the individual's interests or rights (eg privacy rights) over-ride our interest?	On balance, can we treat this as a 'legitimate interest'?
Emailing women with relevant Tommy's pregnancy information beyond the gestational cycle.	A key marketing communication opportunity to connect pregnant women to our pregnancy healthcare advice/post pregnancy information	<p>To receive health information pertaining to pregnancy, with clear indicators of how they can manage their email preferences/unsubscribe from emails.</p> <p>In line with the industry standard, women would reasonable expect to receive more emails beyond the birth of their baby that responded to their new situation, but ojly if they have explicitly stated that they want and are expecting that information</p>	Yes. If we want them to opt in to extended communication, we need to add it into the sign up procedure or as a secondary ask through one of the emails in the gestational cycle.	No

The Health Professionals Emails

What activity are we assessing?	What is our interest?	What would the individual's reasonable expectations be?	Do the individual's interests or rights (eg privacy rights) over-ride our interest?	On balance, can we treat this as a 'legitimate interest'?
Emailing women who have signed up for the health professional email through our channels additional general comms if they have selected to hear from us via our newsletter	A key marketing communication opportunity to connect healthcare professionals to pertinent information as a result of our research and charity activities.	To be informed of relevant healthcare news and opinions in connection with Tommy's charity activities and updates, but not general charity news ad updates news unless they have clearly opted in and expressed that wish.	Yes	No

Tommy's corporate partner emails

<p>Sending bespoke newsletters in tandem with one of our corporate partners to announce specific events, promote certain products, or let our followers know 'added value' opportunities secured through our partners eg discount vouchers to those who have signed up to our newsletter</p>	<p>A key marketing communication opportunity to communicate to people our news, updates and campaigns and give added value, as well as foster relationships with companies beneficial to the charity both financially and through brand affiliation.</p>	<p>To receive these news in the context of having signed up to communications from Tommy's and news relevant to the charity and its activities.</p>	<p>No</p>	<p>Yes</p>
<p>To email business contacts at partner corporate businesses, asking them to share communication of Tommy's marketing activity/messages with their consumers</p>	<p>A key marketing communication opportunity to communicate to people our brand, news, updates and campaigns and give added value.</p> <p>To be able to provide corporate partners with content relevant to their business in connection to our partnership.</p>	<p>To be able to share marketing comms from Tommy's within their own comms and in line with their GDPR opt in policy and management.</p>	<p>No</p>	<p>Yes</p>

Automated website emails

<p>Automated website emails at certain points along the consumer touchpoint;</p> <ul style="list-style-type: none"> - Donation - Abandoned shopping basket <p>To prompt people to complete a donation or order. The emails are automated and no personal information is stored on our central RE system</p>	<p>For administrative purposes, to ensure that those who were in the process of donating or collecting fundraising material for us complete their orders.</p>	<p>To be prompted should they have not completed a consumer journey they were on</p> <p>Alternatively, they may not wish to be contacted if they have not actively signed up for supporter newsletters on our site.</p>	<p>No, as this is an administrative email and no personal information is stored on the Tommy's system</p>	<p>Yes</p>
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