

## Legitimate Interests Assessment: Use of IP address for content delivery

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### 1. Purpose Test

Is there is a legitimate interest behind the processing?

- Why do we want to process the data?  
We need to process the IP address and basic call parameters to deliver content. We deliver content because our services are called. We must process the IP address and basic call parameters in order to deliver content which we are paid to serve for our clients.
- Who benefits from the processing?  
We benefit from the processing as this is what we are paid to do by our clients, and without processing this data we cannot deliver any services.  
Our client benefits from the processing as they get what they are paying for, as the ad is delivered.  
The publisher whose page is being visited benefits as we are making sure they can capitalize on the visits to the page.  
The visitor to the page benefits as he/she can visit the page without having to pay.
- Are there any wider public benefits to the processing?  
No, the processing has no benefits outside of the group of involved parties.
- What would the impact be if we couldn't go ahead with the processing?  
We would not be able to operate our business as it is not possible for us to ask consent for responding to a call without prior knowledge of the call. So, we need to assume that when we get a call we can process it as a legitimate interest.
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?  
Yes, we refer to this processing and using the lawful basis of legitimate interests in our privacy policy.
- Would our use of the data be unethical or unlawful in any way?  
No, we are not using the data to target individuals, or in any way to infringe any ones rights. We process the IP addresses to deliver content upon request – and return the content to the correct caller.

Accordingly, we process IP addresses and any call data delivered in the https request using the lawful basis of legitimate interest to deliver content.

### 2. Necessity Test

Is there is a legitimate interest behind the processing?

- Will this processing actually help us to achieve our purpose?  
It is a requirement for us to have any value – so it is not just a help to further the interest, it is a requirement.
- Is the processing proportionate to that purpose?  
Yes.
- Can you achieve the same purpose without the processing?  
No.
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?  
There is currently no other way to deliver content on the internet to webpages. Unless the publisher is hosting all content including any content from us on their own servers.

- Is there another less intrusive way to achieve the same result?  
No, as the publishers cannot host all the ads that are running on their pages, it is not a feasible solution to have all ad content hosted on the publisher's pages.

### 3. Balancing Test

What is the impact on individuals' interests and rights and freedoms. Does this override our legitimate interests?

- Is it special category data or criminal offence data?  
No.
- Is it data which people are likely to consider particularly 'private'?  
No.
- Are you processing children's data or data relating to other vulnerable people?  
Not specifically, we cannot see if the individual or individuals sitting behind an IP address is a child. So, we have no means to determine if the IP is from a child, as webpages are visited by both children and adults it is fair to assume that some of the visits will be from children. But because of the nature of our processing there is no reason to argue that any special processes should be adopted in those cases. So, "yes" we assume that we also process IP addresses from children sometimes. The same applies for vulnerable people, we also assume that we also process IP addresses of vulnerable individuals.
- Is the data about people in their personal or professional capacity?  
No.
- Is any of the data particularly sensitive or private?  
No, as we are not storing the IP addresses and not building profiles to target individuals the processing is 100% non-sensitive and 100% non-private.

### 4. Our decision

Can we rely on legitimate interests for this processing?	Yes
<p>Comments to justify our answer?</p> <p>We believe that processing IP addresses without using it for targeting/profiling to display ads when requested to do so by our clients as part of our services is permitted under the lawful basis of legitimate interests.</p>	
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