

# Legitimate Interest Statement

Under Europe's data protection law (the General Data Protection Regulation (EU) 2016/679 or "GDPR") there are a number of lawful bases on which organisations can use (or "process") your personal data. One lawful basis is an organisation's "legitimate interests".

Generally speaking, Legitimate Interests means that we can use your personal data if we have a genuine reason to do so, provided of course that we are not harming your rights and your interests.

The Triple P Group ("TPG") is responsible for disseminating the highly regarded Triple P-Positive Parenting Program® ("Triple P") throughout the world. Triple P is a parenting and family support strategy developed by Professor Matthew Sanders and colleagues at The University of Queensland in Brisbane, Australia.

We hold the data of parents, practitioners and agencies including government bodies who are existing customers or who have expressed an interest in Triple P ("our customers and supporters"). We believe that our customers and supporters are aware of TPG and of the nature of their relationship with us. We also believe that our customers and supporters understand that there are mutually beneficial reasons for our remaining in contact with them.

Accordingly, TPG will rely on legitimate interest for some of its processing of personal data, in line with GDPR Article 6(1)(f).

## What does this mean?

When you provide us with your personal data, we may use your information for our legitimate business interests.

## When will we use Legitimate Interests?

Some typical examples of when we might rely on legitimate interests are for direct marketing, informing customers of updates to our systems or to the positive parenting program, maintaining the security of our systems and for the prevention of a crime such as fraud.

Historically we have relied on Legitimate Interests when sending direct marketing messages, but from March 2020 we will be collecting consent for direct marketing moving forward. Where we rely on Legitimate Interests when sending direct marketing messages, this allows us to contact you, our customers and supporters, by post and by electronic means. This includes letting you know about training and accreditation courses that are available, about updates to Triple P and about our products and promotions. We will do our best to make sure our marketing is relevant to you and is tailored to your interests.

You are of course free to opt out of receiving these messages at any time. We will include clear information about how to do so in all of our messages.

## When won't we rely on Legitimate Interests?

We recognise that our legitimate business interests do not automatically override your interests. We will not rely on legitimate interests to process your data, where we believe the use of the data could harm or have a significant impact on your privacy. We also will not rely on our Legitimate Interests to use your data in ways you don't understand, you would not reasonably expect or you would likely object to, if we explained it to you.

Before using your information for our legitimate business interests, we will carefully consider the purpose of the processing and whether it is necessary. We will then balance our interests with any potential impact the processing may have on you and your rights.

Where your interests and rights override ours, we will not rely on our Legitimate Interests to use your data. We may however still process your data, if we have your consent or if we are otherwise required or permitted to do so by law.

## Our Interests

Generally speaking, our objectives when sending direct marketing, are to maintain and strengthen our existing customer relationships, to generate sales of relevant products and services and, in so doing, to further disseminate Triple P throughout the world. Our ability to do this, including to generate income, would be put at risk if we were not able to directly market to our customers and supporters. This could potentially impact TPG's ability to disseminate the Triple P Program effectively.

When undertaking direct marketing, the personal data we typically use includes your name, contact information and whether you are a parent, a practitioner or are from an agency. For customers and supporters who have business-to-business relationships with TPG, we will likely use business contact information unless you gave us your personal contact information instead. No sensitive or special category person data is used.

## Third Party Service Provider working on our behalf:

TPG will never sell, rent or licence your data. However, in order to deliver direct marketing to you, we may provide your personal data (including your name and contact details) to the third-party service provider that is tasked with coordinating communications for TPG. This service provider understands their data protection obligations under the GDPR. They are committed to safeguarding the data we share with them. They will never sell, rent, licence or distribute your data. If you would like more information, please contact our Data Protection Officer at [dpo@triplep.net](mailto:dpo@triplep.net).

## Any questions about privacy or the protection of your data?

TPG's privacy policy is available on our website [www.triplep.net](http://www.triplep.net). And if you have any questions regarding this statement or about how we protect your data, please contact our Data Protection Officer by email at [dpo@triplep.net](mailto:dpo@triplep.net).