WEELA Legitimate Interests Assessment

DRAFT FOR REVIEW - VERSION 1.1
Last updated: 25 October 2026

Organisation: WEELA - Worlds End Estate Leaseholders Association

Lawful basis: Legitimate Interests - UK GDPR Article 6(1)(f)

1. Purpose test - what is our legitimate interest?

WEELA is a leaseholders' association representing leaseholders within the Worlds End Estate.

WEELA needs to collect and use limited personal information in order to:

- maintain and administer the registration of qualifying leasehold properties and the membership of the Association;
- verify eligibility for registration and membership, including the status of Leaseholders and the authority or nomination of Corporate Representative Members, Alternative Members and Voting Representatives;
- communicate with Leaseholders and Members;
- organise meetings, nominations, elections and ballots and verify the validity of votes cast;
- maintain the Register of Registered Leaseholds, the Register of Members and other records of meetings, elections, decisions and governance;
- deal with enquiries and matters raised by Members and Leaseholders;
- represent the interests of leaseholders to the Royal Borough of Kensington and Chelsea (RBKC); and
- demonstrate to RBKC that WEELA has the required level of registered qualifying leasehold properties and otherwise obtain, maintain and comply with the requirements of recognition as a representative leaseholders' organisation.

These are legitimate and necessary activities of a leaseholders' association and benefit both WEELA and the leaseholders it represents.

Purpose test satisfied: Yes.

2. Necessity test - is the processing necessary?

To carry out these activities WEELA needs to know which properties are Registered Leaseholds, who the Leaseholders of those properties are, which Members are associated with them, how to contact relevant people and, where applicable, who is authorised or nominated to act as Corporate Representative, Alternative Member or Voting Representative.

It is also reasonably necessary to maintain records of:

- applications to register Qualifying Leaseholds and applications or confirmations relating to membership;
- ownership, identity and authority information where reasonably required to verify eligibility or representation;
- contact details and preferred methods of communication;
- designation and replacement of Voting Representatives, Alternative Members and Corporate Representatives;
- committee nominations, elections and membership;
- attendance or representation at meetings;

- votes and ballot records where reasonably necessary to administer or verify a meeting, election, ballot or resolution;
- relevant correspondence;
- meeting minutes; and
- limited notes concerning matters dealt with by WEELA.

Some information may also be required to demonstrate WEELA's registration and membership levels, obtain or maintain recognition by RBKC, and comply with applicable recognition arrangements, including appropriate governance information where required.

WEELA will collect and retain only information which is reasonably relevant to these purposes. There is no reasonably practical, less intrusive way for WEELA to administer a membership organisation, operate its constitutional voting arrangements and represent its members without maintaining these basic records.

Necessity test satisfied: Yes.

3. Balancing test - impact on individuals

The information WEELA normally holds is principally ordinary contact, property, registration, membership and administrative information.

Leaseholders who register a qualifying leasehold property with a representative leaseholders' association, and people who choose to become or act as Members or representatives, would reasonably expect WEELA to:

- maintain their name, property, membership or representative status and contact details;
- communicate with them;
- record registration and membership;
- maintain the Register of Registered Leaseholds and Register of Members;
- administer and verify meetings, elections, ballots and voting arrangements;
- keep records of meetings, decisions and governance;
- maintain relevant correspondence; and
- provide limited evidence of registration, membership and governance to RBKC where reasonably necessary for recognition or applicable recognition arrangements.

The potential privacy impact is considered low because:

- information is used only for WEELA-related purposes;
- WEELA does not sell or use personal information for unrelated commercial marketing;
- access to records is restricted to those who need it for WEELA administration;
- disclosure to RBKC is limited to information reasonably necessary for recognition or applicable recognition arrangements;
- unnecessary personal information will not be included in published minutes;
- free-form notes should contain only factual information relevant to WEELA activities;
- information will not be retained longer than reasonably necessary, except for appropriate permanent or historical governance records, including records needed to preserve an accurate history of registration, membership, elections and decisions; and
- electronic information is protected using appropriate access controls and Microsoft-hosted systems.

WEELA does not normally seek special-category personal information. If such information is received incidentally, it will not be retained or used unless there is a genuine need, an appropriate lawful basis and, where required, an applicable condition for processing special-category data.

Individuals may object to processing based on legitimate interests, and any objection will be considered in accordance with UK data protection law.

On balance, the interests and fundamental rights of Members, Leaseholders and other individuals do not override WEELA's legitimate interests, provided the safeguards described above continue to be applied.

Balancing test satisfied: Yes.

Conclusion

WEELA has concluded that legitimate interests is an appropriate lawful basis for the routine processing of personal information required to register qualifying leasehold properties, administer the Association and its membership and governance arrangements, and represent leaseholders.

The processing is proportionate, is within the reasonable expectations of the individuals concerned, and presents a limited privacy risk.

This assessment should be reviewed if WEELA materially changes the information it collects, the purposes for which it is used, its constitutional governance arrangements, or the organisations with which it is shared.

Assessment outcome: LEGITIMATE INTERESTS MAY BE RELIED UPON

Approved by: _____

Position: _____

Date: _____