

# MSC Project - DOER

## Description

Legitimate interest is one of the six legal bases provided by the GDPR for data processing. The legitimate interest basis was designed to be difficult to be used less frequently than consent, requiring a Legitimate Interest Assessment (LIA) as part of the Data Processing Impact Assessment (DPIA) to demonstrate that the data processing was indeed for data processing. However, the three-step test constituting the LIA is complex, and the requirements are more designed towards lawyers than computer scientists. In addition, it is hard to determine what LIA will actually amount to a positive output.

In this project, I will collect and analyse data from privacy policies of UK and EU-based companies to determine the current endorsement of legitimate interest as a legal basis for processing. I will study the data to understand how these companies justify the use of legitimate interest, and will use these findings to create a standardised solution for recording outputs of LIAs.

## Objectives

### Primary

- Build a scraper that can scrape privacy policies from UK-based companies in the retail industry.
- Analyse the data from the privacy policies collected to determine which legal basis for data processing are mentioned in each of them.
- Find a standardised way of recording the output of a Legitimate Interest Assessment (LIA).

### Secondary

- Expand the scraper to privacy policies of UK-based companies outside the retail industry.
- Expand the scraper to privacy policies of french and irish retail companies, and analyse the results with UK-based companies.
- Apply topic modelling techniques to the data to understand how the legitimate interest is used by companies as a legal basis for data processing.
- Find a solution to integrate the output of an LIA into a privacy notice.

### Tertiary

- Expand the scraper to privacy policies of retail companies based in all the EU member states, and analyse the behaviours noticed for each country with regards to the legal bases for processing.
- Create an automated tool to conduct the LIA which can be used by non-legal experts.

## Ethics

I have completed the ethics self-assessment form and answered “no” to all the questions, demonstrating that there are no further ethical considerations. The form was signed by both my supervisor and myself, and uploaded on MMS.

## Resources

My project will not require any special resources, other than what is already provided by the school.

## Supervision

Weekly supervisions meetings via Teams.