

TALENT JOURNEY

Legitimate Interest Assessment

Required when legitimate interests is the lawful basis. Must pass a three-part test. Annual review required by ICO guidance.

AI Processing of Session Content | May 2026

| Field | Detail |
|--------------|-----------------------------------------------------------------------|
| Organisation | Talent Journey Operations Limited (No. 15828503) |
| Prepared by | Mark Beal-Preston |
| DPO | Rob White — dpo@wearetalentjourney.com |
| Controller | Hugo Sugden, Director |
| Date | May 2026 |
| Review date | May 2027 (mandatory annual review) |
| Processing | AI processing of advisory session transcripts to build knowledge base |
| Lawful basis | Legitimate interests — Article 6(1)(f) UK GDPR |

Legitimate interest: building an AI-powered advisory knowledge base to deliver on-demand, personalised strategic advice to recruitment founders at scale — extending the value of Talent Journey's advisory expertise to all members 24 hours a day.

Part 1 — Purpose Test

Is this a genuine, specific legitimate interest that a reasonable person would recognise?

| Question | Assessment |
|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is this a genuine legitimate interest? | Yes. Advisory delivery is Talent Journey's core commercial purpose. The knowledge base is the infrastructure that enables this at scale. |
| Is the interest specific? | Yes: building a structured, anonymised knowledge base; powering AI advisory interfaces; improving quality through ongoing ingestion. |
| Would a third party recognise this as legitimate? | Yes. Using session content to improve and extend an advisory service that members pay for is commercially standard and directly connected to what members subscribed for. |

Purpose test: PASSED

Part 2 — Necessity Test

Is the processing necessary? Could the purpose be achieved with less intrusive means?

| Alternative considered | Why rejected or partially adopted |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Manual curation only — no AI | Impractical at scale. Thousands of hours of human review needed. Cannot produce equivalent knowledge base commercially. |
| Deterministic anonymisation before AI | More privacy-protective but not yet technically feasible. Adopted as Phase 2 target. |
| Summaries only, not raw transcripts | Reduces quality significantly. Summaries included as partial mitigation alongside transcripts. |
| Consent instead of legitimate interests | Not appropriate — meaningful withdrawal is impossible once content is anonymised and incorporated. Legitimate interests with genuine opt-out is the correct basis. |

Data minimisation: raw transcripts deleted immediately after processing. Only anonymised insights retained.

Necessity test: PASSED

Part 3 — Balancing Test

Do data subjects' interests, rights, or freedoms override the legitimate interest?

| Factor | Weight | Assessment |
|-----------------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------|
| Sensitivity of session content | Against TJ | Sessions may contain commercially sensitive and personal context. Increases weight of data subject interests. |
| Third-party data subjects | Against TJ | Sessions may reference third parties who have not consented. Most significant factor in the balancing test. |
| Raw data leaves infrastructure before anonymisation | Against TJ | Residual privacy risk. Mitigated by provider selection, system prompt design, human review. |
| Reasonable expectations of members | For TJ | Members subscribing to an advisory platform can expect session content to improve that service. |
| Low impact on data subjects | For TJ | Raw data deleted immediately. Anonymised insights cannot identify individuals. No adverse decision made about any subject. |
| Genuine opt-out right | For TJ | Members can exclude content at any time with no service impact. Third-party data redaction is required and guided. |
| Provider safeguards | For TJ | All providers under DPAs prohibiting model training. ZDR enabled where available. |

Balancing conclusion: the legitimate interest outweighs data subject interests provided the documented safeguards are implemented and maintained. Processing is transparent, data minimisation is robust, and the opt-out right is genuine. Residual risk is low.

Conclusion and Sign-Off

AI processing of advisory session content for the purpose of building the Talent Journey knowledge base is lawful under Article 6(1)(f) UK GDPR, subject to the safeguards documented above being implemented and maintained.

| Field | Detail |
|---------------------|---------------------------------------------|
| DPO review | Rob White — 28.05.26 <i>Robert White</i> |
| Controller sign-off | Hugo Sugden — 6.7.26 <i>Hugo Sugden</i> |
| Next review | May 2027 (mandatory annual review) |