

Legitimate Interest Assessment (LIA)

Eatomate Ltd | **Date:** March 2026 | **Version:** 1.0

This assessment follows the three-part test recommended by the UK Information Commissioner's Office (ICO) for relying on legitimate interest under GDPR Article 6(1)(f).

Part 1: Purpose Test — Identifying the Legitimate Interest

1.1 What is the purpose of the processing?

To produce anonymized, population-level aggregate statistics and de-identified pricing intelligence from user data, for the purposes of:

1. **Commercial research and data licensing** — Aggregate grocery pricing intelligence (SKU-level, branch-level, borough-level) licensed to FMCG brands, retailers, hedge funds, and market research firms.
2. **Public health intelligence** — Borough-level nutritional status mapping (e.g., micronutrient deficiency prevalence by demographic group) provided to NHS, Public Health England, local authorities, and academic institutions.
3. **Academic research partnerships** — Anonymized nutrition-health outcomes datasets for university research programmes studying diet-disease relationships at population scale.
4. **Product improvement** — Aggregate patterns used to improve prediction algorithms, recipe databases, and portion models that directly benefit all users.

1.2 Whose interest is it?

- **Eatomate Ltd** (the data controller) — commercial interest in generating revenue from data products to sustain and grow the service.
- **The public** — public health authorities and academic researchers gain access to real-time, borough-level nutritional intelligence that currently does not exist, replacing expensive and outdated survey-based methods.
- **Users collectively** — network effects from aggregate data improve the service for all users (e.g., improved OCR mappings, tighter portion models, better predictions).

1.3 Is it a legitimate interest?

Yes. All four purposes are recognised legitimate interests under GDPR:

- Commercial data licensing is a standard and lawful business activity.

- Public health research is explicitly recognised in GDPR Recital 157.
- Academic research is recognised in GDPR Article 89 and Recital 159.
- Product improvement directly serves the contractual relationship with users.

1.4 Are there any relevant regulatory or ethical issues?

- Health-related data (nutrition patterns, body composition, exercise) requires careful handling. However, the processing produces only aggregate statistics — never individual health profiles. The outputs are not “special category data” under Article 9 because they cannot be attributed to any identifiable natural person.
- Pricing data (Flow B) is fully anonymized at the point of creation — no user identifiers are ever associated with individual SKU price observations.

Part 2: Necessity Test — Is the Processing Necessary?

2.1 Does the processing actually help achieve the purpose?

Yes. Aggregate statistics cannot be computed without processing individual user records at query time. The processing is the minimum required step between personal data and anonymous output.

2.2 Is there a less intrusive way to achieve the same result?

No. The specific value of Eatamate’s data is that it is derived from actual verified consumption (physics-based reconciliation), not from surveys or estimates. There is no alternative data source that provides:

- Real-time, borough-level, SKU-level grocery pricing
- Physics-verified nutritional intake at population scale
- Cross-cutting nutrition-economics intelligence (cost per nutrient by demographic)

The processing is the minimum necessary: individual records are queried, aggregated, k-anonymity is enforced, and only the aggregate output is produced. No individual records are ever stored in a de-identified intermediate form (except Flow B pricing, which contains no user identifiers by construction).

2.3 What is the minimum data needed?

For pricing intelligence (Flow B): - Store name, store location (including postcode), product name, price, date - No user ID, no receipt ID, no item combinations — minimum by design

For health/nutrition aggregates (query-time computation): - Locality (derived from receipt store location) - Age band (5-year bands, derived from

date of birth — exact age never exported) - Gender - Dietary pattern (derived from meal logs) - Activity level band (derived from exercise logs) - Aggregate nutritional metrics (means, medians, percentiles) - No individual records, no exact age, no exact weight/height in outputs

For cross-cutting intelligence (query-time computation): - Combines the above with per-person spend attribution (derived from receipt items + meal consumption attribution) - Computed at query time from personal records, only aggregates output - K-anonymity (k=5) enforced on every output cell

Part 3: Balancing Test — Does the Individual’s Interests Override?

3.1 What is the nature of the personal data being processed?

- **Nutritional intake data** — what users eat and in what quantities. This is health-related but not “special category” data under Article 9 (it is dietary self-reporting, not medical records or genetic data).
- **Purchasing data** — what users buy and at what price. This is standard transactional data.
- **Body composition data** — weight, height, body fat percentage. This is sensitive and handled with extra care (only aggregate statistics, never individual values, in outputs).
- **Exercise data** — activity type, duration, intensity. Standard fitness data.
- **Geographic data** — locality derived from store location on receipts. Not home address (never collected).

3.2 What are the reasonable expectations of the data subject?

Users sign up for a nutrition tracking service and upload receipts to track their food intake and spending. They can reasonably expect:

- Their personal data will be used to provide the nutrition tracking service (contract performance).
- Their data may be used in aggregate form to improve the service (reasonable and common in technology products).
- Their receipt data may contribute to aggregate pricing intelligence (disclosed prominently in the Privacy Policy, Section 5.1).
- Their nutrition and health data may contribute to population-level health statistics (disclosed in Privacy Policy, Section 5.2).

The Privacy Policy clearly discloses all four processing purposes, the two-flow data architecture, the k-anonymity protection, and the right to object. Users are informed before and at the point of data collection. This Legitimate Interest Assessment is itself a publicly accessible document, linked directly from the

Privacy Policy (Section 5.3), ensuring full transparency for users, institutional partners, and regulatory bodies.

3.3 What is the likely impact on the individual?

Impact is minimal to negligible:

- **Pricing intelligence (Flow B):** Zero impact. Data contains no user identifiers. Individual price observations are equivalent to publicly observable shelf prices. Re-identification is impossible by construction.
- **Health/nutrition aggregates:** Negligible impact. Only population-level statistics are output. K-anonymity ($k=5$) ensures no output cell is based on fewer than 5 users. Individual data is never exposed. The processing touches personal data at query time but produces only anonymous output.
- **Cross-cutting intelligence:** Same as above. Computed at query time, only aggregates output, $k=5$ enforced.
- **No profiling or automated decision-making** affecting individuals results from this processing.
- **No data is shared with third parties in identifiable form.** All licensed data products contain only aggregate statistics or de-identified pricing observations.

3.4 Are there additional safeguards to reduce impact?

Yes, multiple layers:

1. **K-anonymity ($k=5$):** No aggregate statistic derived from user data is ever based on fewer than 5 users. Cells below this threshold are suppressed entirely.
2. **Dimensional banding:** Age is banded into 5-year groups. Exact weight, height, and age are never present in outputs. Body composition appears only as aggregate statistics.
3. **Two-flow separation:** Pricing intelligence (Flow B) is separated from user records at the point of creation. No user ID is ever associated with a price observation. The flows cannot be re-joined.
4. **No intermediate storage:** Health/nutrition aggregates and cross-cutting intelligence are computed at query time from personal records. No de-identified intermediate dataset is materialised or stored.
5. **Immediate address discarding:** Raw store addresses (street, postcode) are discarded from user records immediately after deriving locality. Postcodes are retained only in Flow B (pricing intelligence) which contains no user identifiers.

6. **Receipt image deletion:** Original receipt images are automatically deleted after 30 days.
7. **Right to object:** Users retain the right to object under Article 21 by contacting support@eatomate.co.uk. Objections are assessed individually. Given the minimal impact of the processing and the compelling legitimate grounds (public health value, service improvement, commercial sustainability), we may continue processing in most cases — but each objection is reviewed on its merits.

3.5 Balancing conclusion

The legitimate interests of Eatomate Ltd and the public interest in population-level nutritional intelligence **are not overridden** by the rights and freedoms of the data subjects, because:

- The processing produces **only aggregate statistics** — no individual data is ever exposed in any output.
- **K-anonymity (k=5)** prevents any output from being based on a population too small to guarantee anonymity.
- The **impact on individuals is negligible** — their personal data is processed momentarily at query time and only the aggregate result is produced.
- Users are **clearly informed** of all processing purposes via the Privacy Policy.
- The **right to object** is preserved and accessible via a simple support request.
- The **public health value** of real-time, borough-level nutritional status mapping is substantial and cannot be achieved by less intrusive means.
- **Multiple technical safeguards** (dimensional banding, two-flow separation, address discarding, k-anonymity) minimise any residual risk.

Decision

Legal basis confirmed: Legitimate Interest under GDPR Article 6(1)(f).

The processing described in this assessment may proceed. This assessment will be reviewed annually or when there is a material change to the processing activities described.

Approved by: Rohith Venkata Bhamidipati, Director, Eatomate Ltd **Date:** March 25, 2026 **Review date:** March 2027