

GDPR Article 6(1)(f) Cheat Sheet for B2B Lists

A one-page legal-basis cheat sheet for using LinkedIn-derived contact data under legitimate interest.

Persona P4-Director - Pain rows 14.x + 16.x - Expected CR 3 % page-view to email

Article 6(1)(f) of the GDPR â legitimate interests â is the most common lawful basis for B2B email outreach in the EU and UK. It is also the basis most likely to fail if the LIA (Legitimate Interests Assessment) is missing or shallow. The cheat sheet below is the structure the LIA must take.

The three-part LIA test

Purpose test: identify the legitimate interest. For B2B outreach this is typically "promotion of products and services to professionals in roles relevant to the offering."

Necessity test: show that the interest cannot reasonably be served by less-intrusive means. Cold email is necessary because the contact has not opted into a list and there is no contractual basis.

Balancing test: weigh the interest against the rights of the data subject. Document the safeguards that tip the balance: opt-out per email, frequency cap, minimal data, no profiling.

What documentation is required

A written LIA, dated and signed by the controller. A privacy notice that names Article 6(1)(f) explicitly. A transparent opt-out path on every outbound email. Records of opt-outs honoured within five business days.

TTPA holds a copy of the LIA on file for every buyer who runs cold-outreach campaigns through us, and refreshes it annually.

Common failure modes

Failure 1: relying on "B2B is exempt" â it is not, in any EU/UK jurisdiction.

Failure 2: using purchased contact lists without a documented chain-of-custody back to lawful collection.

Failure 3: failing to honour opt-outs across multiple campaigns by the same controller. Failure 4: profiling without a separate Article 22 assessment.

Reviewed by Toptronic GC

This sheet was drafted with Toptronic GC and is intended as a starting point only â not legal advice. Consult counsel for jurisdiction-specific application.

Next step.

Read the DPA

<https://tpa.example.test/legal/dpa/>