

## Supplier Privacy Notice

### Introduction

Under the Energy Company Obligation (ECO) scheme large energy suppliers provide funding towards energy efficiency measure installations in domestic homes. In order for you to have a measure installed into your home under the ECO scheme we need to collect some of your personal information and share this with other organisations. We will only collect and use personal data in ways that are described here, in a way that is consistent with our obligations and your rights under the law.

### The personal data we collect and use

We collect your data directly and this data may include:

- Your name, address, and in some cases your date of birth (so we can check you are eligible for the scheme and contact you regarding your installation);
- Proof of identity (which may be collected to evidence a supporting component or for eligibility evidence);
- Copies of documents showing proof of benefits and income supplied to you by the Department for Work and Pensions, HMRC and the Ministry of Defence (this will be limited to information showing you are eligible for the scheme);
- Your phone number and email address (so you can be contacted as necessary for the Purpose outlined in this notice);
- Optional: the financial amount you have contributed towards the cost of the installation (to help the Department for Business, Energy and Industrial Strategy develop future schemes).

### Providing your personal data

We will tell you if providing some of your personal data is optional. In all other cases you must provide your personal data or we will be unable to install a measure into your home under the ECO scheme.

### Using your personal data: legal basis and purpose

We will process your personal data:

- As necessary to fulfil our contract with you, eg.
  - to manage and undertake the contract (including the installation of a measure into your property).
- As necessary to pursue our legitimate interests, eg.
  - to check you are eligible for the ECO scheme;
  - to share your data with third parties who administer, support or enforce the ECO scheme (as specified under 'Sharing your personal data').
  - to collect the financial amount you have contributed towards the cost of the installation.
- As necessary to comply with a legal obligation, eg.
  - where you exercise your rights to make requests under data protection law.

In some circumstances we may need to process special categories of data (eg. Information related to your health as evidence you are eligible for the scheme). In these cases, we'll need to rely on an additional condition for processing this information. Where the data is being processed by a government body, local authority, the Crown or a Minister of the Crown under the exercise of its functions under an enactment or rule of law, this will be based on a substantial public interest.<sup>1</sup> Where the data is being processed by an obligated energy supplier, this will either be based on your explicit consent or the "Safeguarding of economic well-being of certain individuals" substantial public interest processing condition.<sup>2</sup> Where your data is processed based on your consent, you can withdraw your consent at any time. In all other cases, we will tell you the condition upon which we are processing your special category data.

Any data processing of your disability benefit data will also be carried out in compliance with an "appropriate policy statement" a copy of this will be provided on request.

### Sharing your personal data

We will share your personal data with:

- if necessary the Department for Work and Pensions will profile your data in order to provide a YES/NO response via the Energy Saving Trust<sup>3</sup> to verify whether or not you receive the relevant benefits to be eligible for the scheme;
- The Office of Gas and Electricity Markets (Ofgem)<sup>4</sup> will:
  - use and share your information in order to fulfil its statutory duties;
  - if requested, share your information with the installer of the measure in order to verify whether it has been notified to Ofgem;
  - if necessary, share your information with auditors contracted to ensure the integrity of the scheme.
  - when required, disclose your personal information to the Secretary of State of the Department of Business, Energy and Industrial Strategy. They may use the data to review and develop Government policy, and for research and statistical purposes and may, for these purposes, link the data with other data sources they

<sup>1</sup> Article 9(2)(g), section 10(3), Part 2 to Schedule 1, paragraphs 5 and 6 to the Data Protection Act 2018 (DPA 2018).

<sup>2</sup> Article 9(2)(g), section 10(3), Part 2 to Schedule 1, paragraph 19 to the DPA 2018.

<sup>3</sup> See the EST datamatch service: <https://datamatch.est.org.uk/>

<sup>4</sup> To find out more about how Ofgem processes your information, refer to their privacy policy available online: <https://www.ofgem.gov.uk/publications-and-updates/eco3-privacy-policy>

hold. They may also share some of the data with other Government Departments and with the Scottish and Welsh Governments for these purposes.

- The obligated energy supplier<sup>5</sup> (who will make a contribution towards the cost of the measure; and will process data as necessary to comply with a legal obligation<sup>6</sup> and in accordance with their own privacy policies);
- Relevant companies supporting the installation:
  - the installer (who installs the measure);
  - the installer's certification body (who monitor a sample of installations to ensure they meet the correct standards);
  - technical monitoring agents (who monitor a sample of installations to ensure they meet the correct standards);
  - managing agents (who facilitate the funding and installation of measures)
  - external auditing agencies (who provide assurance that the data being processed is correct);
  - building control inspectors (who check installations are installed in accordance with building regulations);
  - guarantee companies (who provide warranties for some measures such as wall insulation);
  - the property owner, social housing provider, local authority or managing agent (as and where applicable);
  - software providers (who process your data).
- Anyone else where it is required by law, where you have been notified of the sharing or for whom we have your consent.
- The information you provide may be transferred to 3<sup>rd</sup> parties outside of the European Union. However, this will only take place where this is necessary for the Purpose outlined above. We will ensure all appropriate safeguards, including those set out by the ICO<sup>7</sup>, are in place to protect your data before any transfer takes place.
- Your data will only be processed for purposes relating to ECO, unless you have specifically consented otherwise.

**Criteria used to determine data retention periods**

- Retention for measures with a twenty-five year guarantee (including wall insulation): we may retain your personal data for up to twenty-five years, or as needed to match the lifetime of the guarantees provided;
- Retention for all other measures: we may retain your personal data for up to seven years after the scheme ends, in line with HM Revenue & Customs record management<sup>8</sup>
- The Department for Business, Energy and Industrial Strategy, will hold some information about the measures installed under the scheme, including your address and which may include some information about the scheme eligibility criteria applying to your home or household, but not your name or other personal information, for up to 25 years for these policy, research and statistical purposes.

**Your rights, including accessing your data or amending incorrect data**

You have certain rights<sup>9</sup> regarding information held about you by the Controller (these do not apply in all circumstances). These include the right:

- to access your personal data;
- to be informed about our processing of your personal data;
- to have incorrect data corrected;
- to data portability (to move, copy or transfer your personal data);
- to have your personal data deleted;
- to have the processing of your personal data restricted, or to object to processing of your personal data;
- to complain to the Information Commissioner’s Office (who can investigate compliance with data protection law)<sup>10</sup>, see <https://ico.org.uk/concerns/>

<b>Name and address of the Controller (and Data Protection Officer):</b> Trade Engine Limited Suite 6, Swan Park Business Centre, Kettlebrook Road, TAMWORTH. B77 1AG.	
<b>Type of company (eg. installation, lead generation, supplier etc):</b> Retrofit Coordinator / Installation	
<b>Telephone:</b> (01827) 307675	<b>Email:</b> info@tradeengine.co.uk

<sup>5</sup> Supplier details are available at: <https://www.ofgem.gov.uk/environmental-programmes/eco/contacts-guidance-and-resources/supplier-contact-details>

<sup>6</sup> The Electricity and Gas (Energy Company Obligation) Order 2018

<sup>7</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/>

<sup>8</sup> <https://www.gov.uk/government/publications/hmrc-records-management-and-retention-and-disposal-policy/records-management-and-retention-and-disposal-policy>

<sup>9</sup> A list of your rights under the GDPR is accessible at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

<sup>10</sup> The full reporting procedure is available online: <https://ico.org.uk/concerns/>, or you can call the ICO helpline on 0303 123 1113