

# QERB Energy Ltd

## Data Protection Policy

<b>DOC ID: QE1</b>	<b>Title: Data Protection Policy</b>	<b>Print Date: 2nd May 2018</b>
<b>Original: 1st June 2015</b>	<b>Prepared by: Karen Elsey</b>	<b>Date Prepared: 2nd May 2018</b>
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To be read in conjunction with Qerb Energy Ltd policy QE1A:

### **QERB ENERGY POLICY FOR CONTROL OF PERSONAL DATA**

and all other Qerb Energy policies that refer to the handling of personal data.



# Data protection policy

## Context and overview

### Key details

- Policy prepared by: RYAN ELSEY
- Approved by board / management on: 01/06/2015
- Policy became operational on: 01/06/2015
- Review date: 23/03/2018
  
- Next review date: 23/03/2019

### Introduction

QERB ENERGY LTD needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

### Why this policy exists

This data protection policy ensures QERB ENERGY LTD:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

### Data protection law

The Data Protection Act 1998 describes how organisations — including QERB ENERGY LTD— must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary

6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## People, risks and responsibilities

### Policy scope

This policy applies to:

- The head office of QERB ENERGY LTD
- All branches of QERB ENERGY LTD
- All staff and volunteers of QERB ENERGY LTD
- All contractors, suppliers and other people working on behalf of QERB ENERGY LTD

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals

### Data protection risks

This policy helps to protect QERB ENERGY LTD from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

### Responsibilities

Everyone who works for or with QERB ENERGY LTD has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **board of directors** is ultimately responsible for ensuring that QERB ENERGY LTD meets its legal obligations.
- The **[data protection officer], [RYAN ELSEY]**, is responsible for:
  - Keeping the board updated about data protection responsibilities, risks and issues.
  - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
  - Arranging data protection training and advice for the people covered by this policy.
  - Handling data protection questions from staff and anyone else covered by this policy.
  - Dealing with requests from individuals to see the data QERB ENERGY LTD holds about them (also called 'subject access requests').
  - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The **[IT manager], [RYAN ELSEY]**, is responsible for:
  - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
  - Performing regular checks and scans to ensure security hardware and software is functioning properly.
  - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- The **[marketing manager], [RYAN ELSEY]**, is responsible for:
  - Approving any data protection statements attached to communications such as emails and letters.
  - Addressing any data protection queries from journalists or media outlets like newspapers.
  - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

## General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- QERB ENERGY LTD **will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.

- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## Data use

Personal data is of no value to QERB ENERGY LTD unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

## Data accuracy

The law requires QERB ENERGY LTD to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort QERB ENERGY LTD should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- QERB ENERGY LTD will make it **easy for data subjects to update the information** QERB ENERGY LTD holds about them. For instance, via the company website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

## Subject access requests

All individuals who are the subject of personal data held by QERB ENERGY LTD are entitled to:

- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [email address]. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

## Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, QERB ENERGY LTD will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

## Providing information

QERB ENERGY LTD aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

[This is available on request. A version of this statement is also available on the company's website.]

**QERB ENERGY POLICY FOR CONTROL OF PERSONAL DATA (QE1A)**

<b>DOC ID: QE1A</b>	<b>Title: Control of Personal Data</b>	<b>Print Date: 23<sup>rd</sup> March 2018</b>
<b>Revision: 23 March 2018</b>	<b>Prepared by: Karen Elsey</b>	<b>Date Prepared: 23<sup>rd</sup> March 2018</b>
<b>Effective date: 25 May 2018</b>	<b>Reviewed by: Ryan Elsey</b>	<b>Date Reviewed: 23<sup>rd</sup> March 2018</b>
	<b>Approved by: Ryan Elsey</b>	<b>Date Approved: 23<sup>rd</sup> March 2018</b>

<b>Policy</b>	<p>Qerb Energy Ltd. Data Protection Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.</p> <p>As part of Qerb Energy Ltd. operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.</p> <p>Qerb Energy Ltd. collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.</p> <p>Our data will be:</p> <ul style="list-style-type: none"> <li>● Accurate and kept up-to-date</li> <li>● Collected fairly and for lawful purposes only</li> <li>● Processed by Qerb Energy Ltd. within its legal and moral boundaries</li> <li>● Protected against any unauthorized or illegal access by internal or external parties</li> </ul> <p>Our data will not be:</p> <ul style="list-style-type: none"> <li>● Communicated informally</li> <li>● Stored for more than a specified amount of time</li> <li>● Transferred to organizations, states or countries that do not have adequate data protection policies</li> <li>● Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)</li> </ul> <p>In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs.</p> <p>Specifically we must:</p> <ul style="list-style-type: none"> <li>● Let people know which of their data is collected</li> <li>● Inform people about how we'll process their data</li> <li>● Inform people about who has access to their information</li> <li>● Have provisions in cases of lost, corrupted or compromised data</li> <li>● Allow people to request that we modify, erase, reduce or correct data contained in our databases</li> </ul> <p>In response to the GDPR (General Data Protection Regulation) legislation which will apply from 25<sup>th</sup> May 2018 our Data Protection policy has been reviewed and the procedures clarified within this Policy in order to remain compliant. Both documents QE1 and QE1A together form our commitment to ensuring the safe handling of Personal Data.</p>
<b>Purpose</b>	<p>To ensure that we continue to treat all of our customers and those we come into contact with, with courtesy and respect and within their rights under the Data Protection Act, in particular as stated in GDPR.</p>

<b>Scope</b>	<p>This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.</p> <p>Employees of Qerb Energy Ltd and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.</p>

<b>Responsibilities</b>	<p><b>The Director</b> of the company will ensure that everyone affected by this policy is fully aware of its purpose and of the procedures that must be adhered to.</p> <p>The <b>Data Protection Officer</b> of the company will ensure that all policy and procedures are documented and reviewed and approved by the <b>Director</b> of the Company in line with the requirements of the FCA and in particular the GDPR.</p>
<b>Background</b>	<p>The awareness of Qerb Energy Ltd. that we must continue to review our obligations under the Data Protection Act ensuring that we create a culture of continuous improvement and that we are proactive in implementing changes in legislation.</p>

<b>Procedure</b>	<p><b>1. Restrict and monitor access to personal data</b></p> <p>Following the project held in March 2018 in order to establish the identification and mapping of all information held and critical data assets, key to both GDPR compliance and the potential development of the required system-specific GDPR solutions. We have identified the end-to-end data journey including what data is held, where the data resides, the internal data flows and data flows with external entities (vendors/partner) the security of the data including who has access to the data. Customer data is currently stored in our <b>Customer Relationship Management system (CRM)</b> and customer documentation, including consent forms in the <b>ECOsurv system</b>.</p> <p><b>Outcome and subsequent process:</b></p> <p><b><u>(Procedure A) Customer data where a product or service is purchased from Qerb Energy Ltd.</u></b></p> <p>All of the products or services from Qerb Energy Ltd. include a guarantee or follow up service, customer data will be held in the CRM system until a period of three months passed the duration of the end date. The end date is considered as –</p> <p><b>Work undertaken</b> – three months after the duration of the guarantee</p> <p><b>Quote not taken up</b> – three months from the initial time of contact</p> <p>This allows for quick identification of the person concerned where there is a need to fulfil our ongoing obligations. Where we have provided a guarantee of ten years, the data will be held beyond the regulatory seven year time frame.</p> <p>At the first point of contact with the person concerned, we will explain our need to comply with new legislation and that we have decided to operate on the legal basis of ‘consent’, asking for consent for future contact. We will refer people to our <b>Privacy Policy</b> as quoted on our website.</p> <p>We do not re-market existing customers for any reason other than that we have already agreed upon.</p> <p>All required customer data will be stored in the CrM (Customer Relationship Management system) which is password protected and available to designated staff only.</p> <p>The <b>Office Manager</b> will review the CRM on a monthly basis, auditing the data contained and checking the end dates. Where a date is reached they will remove the data contained.</p>
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In the course of our dealings with customers if it comes to light that a customer wishes us to retain their data beyond this time, the **Office Manager** will amend the end date.

Where a person wishes to withdraw consent prior to the end date, the **Office Manager** will do this in accordance with the **Withdrawing consent procedure**.

- 1 That the request is made in writing by the person concerned.
2. That any implications in respect of on-going guarantees or contracts are clearly explained in writing.

The designated staff manager responsible is **The Office Manager** – (see job description).

**Potential customers** –any information in respect of potential customers, is also held within the CRM and therefore GDPR legislation has been explained and consent has already been confirmed. The Privacy Policy published on the Qerb Energy Ltd website explains our commitment to the principles and regulation in respect of GDPR.

**The CRM is held remotely within the Hub spot server, which is GDPR accredited.**

**Sales staff:** Office staff will gain consent when taking the original request for a visit to quote for work (if the request was via the website consent is gathered here). Once the quote issued the sales person will ask whether that person would like their data to be retained. For example they want us to call again when they are in the position to proceed. If further contact is required, consent will be collected by completing the consent form on the sales person's ipad (ECOsurv). The Sales person will do this in view of the potential customer and will check that they are in full agreement. If further contact is not required all references to this person will be removed from anywhere it is stored.

**Sales people** make use of Google diaries which are password protected. They will clear data from their diaries on a three monthly basis leaving only the address they visited.

**Installation staff** currently uses paper consent forms although they will transfer to the ipad system shortly. These consent forms however are in respect of giving permission to carry out work, consent to collect their data has already been established. Currently all paper consent forms once completed must be stored in a glove compartment or locked boot until the end of day then handed in to the Qerb Office. Here it will be stored in a locked filing cabinet. If further contact is not required all references to this person will be removed from anywhere it is stored.

#### **Customer data where a person has applied for Finance in order to pay for products or services**

Please see - Flow chart provided as part of Procedure A – separate document

#### **Procedure B Customer data where a person has applied for any type of product or service using a government grant or other funding.**

In order to arrange work that is either fully or to some extent being funded by someone other than the person themselves if is necessary to collect personal data to claim the funding. This includes though is not restricted to name, date of birth, address, details of state benefits received.

The **Energy Company Obligation (ECO)** is a government energy efficiency scheme in Great Britain to help reduce carbon emissions and tackle fuel poverty. **Ofgem** (the Regulator of ECO) has provided scripted consent forms which have been adopted by Qerb Energy Ltd. to gain consent to collect this data. Consent and other documentation are stored directly into the 'ECOsurv' application which is fully GDPR compliant. Please see separate attachments:

- EST Data match form from 25<sup>th</sup> May – to gain permission to contact DWP
- Processing Special Categories of personal data – To gain information where a person is in receipt of Disability benefit
- ECO Privacy Notice – which applies to both

The member of staff taking the initial request will explain the need to collect the personal data and refer them to the applicable Privacy Policy.

They will also explain that while they do not need to provide this information, lack of it will restrict us greatly in applying for funding on their behalf. The ECOsurv system data is maintained by the system administrators. Other data required in order to provide the guarantee etc. are kept as in the case of where a product or service has been purchased (see above). Again the **Office Manager** is responsible for checking procedures are followed and

for dealing with any shortfalls (staff performance procedures) and reporting any breaches directly to the **Company Director**.

**Customer data where a person has applied for funded work and is not eligible or where a quote has been issued and is not taken up.**

There is no business need to keep data in respect of anyone who has proved ineligible for funded work.

The **Office Manager** will arrange for the removal of any data that is stored anywhere other than within the ECOsurv application once ineligibility/confirmation of not accepting the quote is received (unless consent has been obtained to hold it for longer).

**All staff who visit customers for whatever reason will be informed that their diaries should contain no historical data (data where consent was gained more than three months ago) other than the address.**

**No paperwork containing any data that could identify any person can be stored/left anywhere it is visible. For example worksheets cannot be left in the space by the vehicle windscreen. They must be kept in the locked glove compartment or locked boot until the end of the day when they must be passed to the Office Manager for secure storage.**

**2. Develop transparent data collection procedures**

This is covered by –

The explanations provided within Qerb Energy Privacy Policy published on the website and where customers are directed in order to understand the requirements

All staff who come into contact with potential or existing customers over the telephone or face to face are instructed to explain the reason why we need personal data, provide assurance that it will be held securely, used only for the purpose intended, only taken when their consent is given and that it is not obligatory and consent can be withdrawn.

Procedures in place are as explained above in point one.

**3. Train employees in online privacy and security measures**

All new employees to Qerb Energy Ltd are not permitted to see any personal information – contained in databases or in any other format until they have completed their **Induction Training Programme** (see **Induction Checklist in the New Employee Training Package**).

**The Induction Training Package** has been revisited and rewritten in line with GDPR requirements and with the express purpose of ensuring that staff fully understand the requirements and know how to put them into practice.

**The Induction Training Package** has been rewritten in conjunction with this **Company Policy** in respect of the control of personal data in order to ensure we can practice what we preach. This is not an exercise but the manner in which our company operates in its dealings with people.

All existing staff will receive the new training package prior to the launch date of GDPR legislation and understanding will be checked.

Any changes to practices will be communicated to all staff immediately they are determined and the training material will be updated accordingly

The training package will be shown to all staff annually and tests of understanding will be held.

**4. Build secure networks to protect online data from cyber attacks**

**5. Qerb Energy Ltd is committed to maintaining a secure network where data is protected from cyber-attack.**

The steps taken include, though are not limited to:

Keeping patches and updates current in particular, verifying that office computers are running current versions of

1. Adobe Acrobat and Reader
2. Adobe Flash
3. Oracle Java

4. Microsoft Internet Explorer
5. Microsoft Office Suite

An inventory ensures each device is updated regularly, including mobile devices and network hardware, Windows and Apple computers have automatic updating enabled.

Qerb Energy Ltd uses strong passwords, a combination of upper- and lower-case letters, numbers and symbols.

All users are regularly reminded against opening emails from unknown sources or of a suspicious appearance. Using a secure VPN. The documentation for our server and VPN software makes sure the strongest possible protocols for encryption and authentication are in use. User access privileges are actively managed to ensure they remain appropriate and inactive accounts are removed.

#### **6. Have clear procedures for reporting privacy breaches or data misuse**

Although the **Office Manager** is the designated person responsible for the on-going auditing and deletion of personal data, the responsibility for seeing that data is processed in the manner agreed by the company, and published in this document, is the responsibility of all.

Staff at all levels is encouraged to report directly to the **Office Manager** or the **Company Director** any concerns they might have in respect of data handling, or indeed any other matter.

Anyone reporting any concerns is never penalised and in fact positively encouraged. This is used as an opportunity to tighten company procedures where necessary and as the means of ensuring we work in a culture of openness and honesty and of constant improvement.

Any breaches are dealt with by the completion of the **Personal Data Breach reporting form** which is sent directly to the **Company Director**. The Company Director will report the breach to the FCA via the company portal to the website.

Qerb Energy Ltd operates a clear desk policy, any information containing personal data is shredded immediately if payment is taken over the telephone, any card details are never repeated aloud as confirmation.

#### **7. Have data handling documented instructions**

All data handling instructions are already included within this document.

#### **8. Clarify data protection practices including document shredding, secure locks, data encryption, backups etc.**

All personal data is shredded or if necessary, stored in a locked filing cabinet overnight. Backups are run daily and all data is stored remotely on a hubspot server.

#### **9. Include data protection provision on our websites**

The Privacy Policy displayed on our website has been updated to show our response to GDPR requirements.

We have also conducted an exercise to ensure that all unnecessary personal data has been removed from our records prior to 25<sup>th</sup> May 2018.

#### **Disciplinary Consequences**

**All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.**



I have been in contact today with a representative of Qerb Energy Ltd.

I would like to hear more about the services we have discussed and realise that in order to do this Qerb Energy will need to process my personal data. The representative from Qerb Energy has explained to me why this is necessary.

I am happy to do this and provide the information needed below.

I understand that I can withdraw consent at any time and that Qerb Energy will only hold my details for the time it is necessary to do so.

Name:

Address:

Date of birth:

Telephone number:

Signed:

Dated:

#### **TRAINING PRESENTATION (PLEASE SEE POWER POINT PRESENTATION)**

#### **SETTING OUT QERB ENERGY LTD RESPONSE TO FCA GDPR LEGISLATION**

The QERB Energy 'Data Retention' project comes out of QERB Energy legal responsibility to comply with additional provisions under the new Data Protection Act.

These new provisions are centered around the regulations for the use of 'personal data'.

Personal data is defined as any data which can be used to identify a living person and the Act defines the legal basis for the handling of that data.

**e.g.** Name, Email Address, Telephone numbers, Bank account details, National Insurance no, Postal Address (Excluding Post Code)

The Act is based around 8 principles of good information handling, which give people specific rights in relation to their personal information and place certain obligations on organizations' processing data. The requirement of the 5th principle is that personal data 'processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes'.

**This means that, as an organisation processing personal data, QERB Energy Ltd. Cannot under the law retain personal data for longer than is necessary.**

### **Requirement 1:**

The maximum reasonable retention period for the majority of personal data is 7 years, unless we have a strong business case to do otherwise.

### **Requirement 2:**

We cannot retain any personal data on our systems that would allow for identification of an individual, either singly or as a combination thereof.

We can retain Data of Birth **OR** Post Code but not both.

**95% OF THE UK POPULATION CAN BE IDENTIFIED WITH JUST DATE OF BIRTH AND POSTCODE of the Data Deletion**

Requirements are to remove all personal data from all of our systems.

For some systems, it is not possible to remove only personal data so entire data objects are deleted (archived documents etc.).

**Any individual has the right to request total deletion if they request it.**

### **1. Legacy and Orphaned Utility**

A Legacy image is one which pre-dates the CSM (not applicable to QERB however we have supporting systems such as Google docs and docs images stored in Dropbox etc.) **(All ECO docs have already had consent)**

An Orphaned image is one which has no personal data attached (not applicable to QERB)

### **2. Business as Usual (BAU) CSM**

The Business as Usual utility (CSM) will process work and images on the system that doesn't fall into the Legacy and Orphaned categories.

There are Access databases on company and personal drives, many of which are no longer in use

Depersonalisation is being carried out manually

The process involves analysis of the data in the database, identification of the database owner(s) and working with these owners to agree the depersonalisation process.

This includes both the on-off data cleanse and the agreement for ongoing depersonalisation

GDPR states that a data subject has the right to obtain from the data controller (us) the erasure of personal data concerning him or her and we have the obligation to do so without undue delay.

**This will invoke the Withdrawing consent procedure.**

1. That the request is made in writing by the person concerned.

2. That any implications in respect of on-going guarantees or contracts are clearly explained in writing.

The designated staff manager responsible is **The Office Manager**

Regulation (EU) 2016/679 (the General Data Protection Regulation or GDPR) becomes effective May 2018 replacing EU Directive 95/46/EC.

GDPR represents a significant step change in the development of data protection law and the level of legal and compliance obligations organisations will need to be able to adhere to and evidence to supervisory authorities (regulators).

Significant penalties in the form of fines can be levied against organisations who fail to meet the requirements of GDPR once the regulation becomes effective in May 2018.

We would need to have captures and recorded consent from the customer/potential customer before we are able to process any special category data. This is because special category data is more sensitive, and so needs more protection. For example, information about an individual's race, ethnic origin, religion, health, sex life or sexual orientation.

## **Data Mapping**

Our initial and on-going project was the identification and mapping of all information and critical data assets, which is key to both GDPR compliance and the development of the required system-specific GDPR solutions. We worked to document end-to-end data mapping including what data was held, where the data resided, the internal data flows and data flows with external entities (vendors/partner) the security of the data including who had access to the data. Any delays in the data mapping project or failure to structure that concurrent activity would have impacted the development phase of the GDPR work stream and its ability to deliver compliant solutions prior to GDPR coming into force.

### **Legal & Compliance soft deliverables**

**HR Policy Revisions** – Job Descriptions revisited to include legal compliance

**Data Processing Policy** - UPDATED

**Data Subject Access Request (DSAR)** – updated processes and procedures

**Personal Data Breach Register** and Breach response/notification procedure revisions

**Revised contractual agreements**, including Master Services Agreements (MSA), with business partners

### **Fair Processing Notice**

Revised Data Protection Notices, with focus on 'Information Layering'.

**'Information Layering'**: which is the term used for the arrangement of information on individual data rights in such a way as to make it easily understood.

**This will become clearer when looking at the Privacy Statement and consent wording and sign in.**

### **Document Changes**

#### **WE NEED TO LOOK AT ALL COMMUNICATIONS THAT ARE SENT TO CUSTOMERS ETC AND INCLUDE OUR PRIVACY POLICY, OUR STANCE WITHIN GDPR AND INCLUDE CONSENT FORM**

This website is operated, and our service is provided, by QERB Energy Ltd, a company registered in England and Wales, with its registered office at 21 Sisna Business Park, Plymouth, PL6 7AE, United Kingdom ("QERB Energy Ltd", "we" or "us"). QERB Energy Ltd is the data controller and employs a Data Protection Officer to ensure your rights are met in respect of the collection and use of your personal data.

This Privacy Policy sets out how we use and protect any information that you give us when you use this website.

We are committed to ensuring that your privacy is protected. Should we ask you to provide personal information by which you can be identified when using this website; you can be assured that it will only be used in accordance with this Privacy Statement.

We may change this policy from time to time by updating this page. You should check this page to see what might have changed and to ensure that you are happy with any changes.

#### **What personal information we ask for:**

We may ask you to provide the following information:

Your name and address

Contact information such as an email address or your telephone number

Demographic information such as postcode, preferences and interests

Other information relevant to enquiry.

**We ask you to confirm that you are happy to provide this information and for us to retain it so that we may deal with your enquiry now and that we may contact you in the future with other offers and services by ticking box YES**

**If you would prefer that we only retain your data in order to deal with your existing enquiry please tick the box marked NO. This will mean though that we are unable to contact you if any other offers should become available in the future.**

#### **What we do with the personal information we gather:**

You do not have to provide any of this information and if you do choose to, you are free to withdraw your consent at any time. We ask for this information so we can contact you about any of the products or services we provide that might interest you. Also so that we can ensure that the products and services we offer are the best match for your property and lifestyle. If you choose not to provide this information it

might prove difficult to ensure our product or service adequately matches your needs however you will not be penalised and we will do our utmost to help you.

**Any of the information we collect from you may be used in one of the following ways:**

**To process transactions:**

If you wish to purchase one of our products or services we will use your personal details to ensure the required work is carried out for you and that we are able through whatever means you select, to collect payment. This may be through card payment, finance or cheque.

**To send periodic emails**

The email address you provide will only be used to send you information and updates relating to your request.

If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, etc. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

**We can assure you that:**

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the service requested. For example if you are contacting us about work using a method of funding, it may be necessary that we contact The Department of Work and Pensions to check your eligibility under the terms of the ECO scheme. We will not contact any third party without your express consent though you should note that grants can only be supplied when we have the full evidence required to claim funding on your behalf.

You are able to request details of the information that we hold on you. An admin fee of £10 will be charged per request and all information will be sent by email only to your personal email address used to request information or apply for services.

**Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

**How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

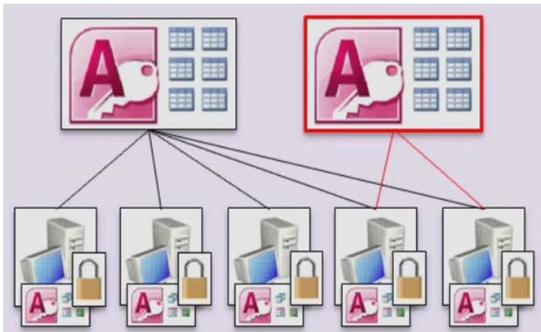
**Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Any Questions?



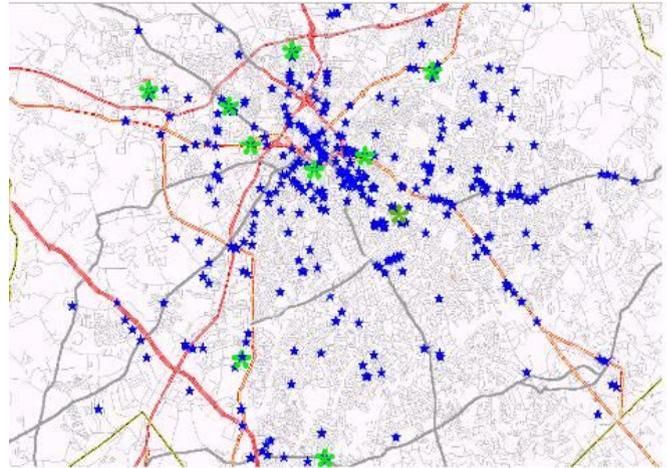
- 1. Lawfulness, fairness and transparency
- 2. Purpose limitation
- 3. Data minimization
- 4. Accuracy
- 5. Storage limitation
- 6. Integrity & confidentiality



**I'm done,  
I can't do  
it  
anymore**



The key changes



**GOOD PRACTICE EXAMPLE**

**✓**

Please provide telephone numbers in case we need to contact you about your claim.

You do not have to tell us your phone number but it will help us to contact you should we have a question about your claim.

Name: \_\_\_\_\_ Mobile: \_\_\_\_\_

Clear explanation of why it would be helpful to provide this information.

**✓**

**About your claim: Sharing information**

Sharing information with your landlord could help us to deal with your claim more quickly and reduce the risk of you being bonded with your rent because of your claim being delayed.

If your housing benefits are paid directly to your landlord or to your landlord's rent account, then we can discuss payment details (eg award dates and amounts) as we have to give your landlord this information.

With your permission, we would also be able to tell your landlord if:

- You have claimed housing benefit
- We have made a decision on your claim, or
- We need more information to make a decision and what that information is.

You can withdraw your permission at any time.

We will give your landlord any information about:

- The personal or family circumstances.

**Your Reasons**

It will not affect your claim if you do not give us permission to discuss your claim with your landlord.

If we can talk to your landlord about your claim please sign below.

I give my total consent permission to share information about the progress of my housing benefit claim with my landlord or their representative.

Signature of claimant: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature of landlord: \_\_\_\_\_ Date: \_\_\_\_\_

Honest explanation of the outcome of choosing not to provide the requested information.

**✓**

**Your destination**

I understand the following:

- We will use the information I have provided to process my claim for housing benefit, council tax benefit, or both.
- We may check some of the information with other landlords within the council, the local authority, other councils and government departments, eg the benefits agency, the Housing Executive and the Housing Office.
- We may also get information about me from certain other organisations, or give information about me to them to make sure the information is accurate, present or latest correct and correct public funds. These other organisations include government departments, other local authorities and private sector organisations such as banks and organisations that may lend me money.
- If given information that is incorrect or incomplete you may take action against me, including court action.

I declare that the information I have given on this form is correct and complete.

Signature of the person receiving: \_\_\_\_\_

Clear explanation of purpose and use.



**QERB ENERGY LTD. INDUCTION CHECKLIST FOR NEW STAFF**

	<b>Formal Employee Training Matrix</b>	<b>Trainer</b>	<b>Date held</b>	<b>Trainee Signature</b>
1	Health/ Safety Information (Fire, Evacuation, First Aid and Protective clothing etc.)			
2	Clear Desk Policy			
3	DSE Assessment			
4	Local Office rules / information			
5	Company Induction – key people, company values etc.			
6	Guide to pay system / performance schemes			
7	Equal Opportunities			
8	Legal Compliance			
9	Data handling Inc. GDPR			
10	DSAR			
11	Treating Customers Fairly			
12	Complaint Handling			
13	Quality Policy			
14	Local Systems. (CSM, ETC)			
15	Confidentiality Agreement			
16	ISO9001			

**QERB ENERGY LTD. CONFIDENTIALITY AGREEMENT**

At Qerb Energy Ltd. we are committed ensuring that any personal data we handle is dealt with according to the terms and conditions of the Data Protection Act and the subsequent legislation GDPR (General Data Protection Regulation).

As such we have issued our Company **Policy QE1A (To be read in conjunction with Policy QE1 – Data Protection) - Qerb Energy Policy for the control of Personal Data.**

This Policy details the processes we adhere to and the controls we have in place to remain compliant.

I declare that I have been made fully aware of these Policies and have received my training in respect of handling personal data in accordance with these Policies

I am aware that during my employment with Qerb Energy Ltd. I will be required to handle personal data and completely understand the requirements upon me.

I am also aware that all data held is completely confidential and must only ever be used for the purposes it is intended.

I will never provide anyone at any time with the means of identifying a customer or potential customer outside of the confines of the company Policy or outside of the company offices.

<b>Name</b>	<b>Signature</b>	<b>Dated</b>
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## **New Privacy Statement**

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We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Job Description

### **Office Manager Qerb Energy**

**Permanent, Full time annualised hours**

#### **Role Purpose:**

At this level, role holders are managing a team, allocating work, controlling work flow, developing team members and managing individual and team performance. They are involved in recruitment and disciplinary issues. They are responsible for ensuring that quality and service standards are met and for reporting to management on performance. Role holders are also expected to contribute ideas for process improvement and implement solutions. They also act as a referral point for the team on technical issues.

They are an ambassador for the company brand and reputation.

The Office Administrator has an excellent knowledge of MS Office and office management software.

The Office Manager will report directly to the Company Director.

#### **Key Accountabilities and Performance Indicators**

**Recruit, coach, develop and appraise team members to maximise individual and team achievement and continuously improve productivity and service levels.**

- Achievement and improvement on service levels and productivity.
- Delivery and coaching against formalised plan.
- Progression of team through individual development plans.
- Adherence to recruitment processes.
- Customer surveys and feedback on trade websites

**Lead and motivate the team to achieve team targets by setting clear objectives and communicating on business issues through effective team meetings.**

- Achievement of team business development targets.
- Team feedback.
- Frequency of team meetings and clarity of minutes.
- Clear objectives in place and documented.

**Monitor and report on work levels and control workflow within the team, maximising the use of resources to ensure that quality and productivity standards are achieved.**

- Production of timely and accurate reports.
- Achievement of, and improvement on, service levels and productivity.

**Provide guidance on technical issues that cannot be resolved, actively handling those outside the authority or expertise of the team.**

- Nature and frequency of suggestions implemented.
- Feedback from project managers.

**Identify shortfalls in process performances and work with other Qerb Energy Ltd. teams contributing to improvement related projects where necessary so that the continuous cycle of improvement is maintained**

- Adherence to the customer feedback procedures.
- Level of complaints received and resolved.
- Feedback from team members on quality of advice given.

**Gain and maintain a comprehensive understanding of all regulatory matters relating to the smooth, efficient and compliant running of Qerb Energy Ltd. Ensure all processes and procedures are adhered to as documented in the Company Policy in respect of Control of Personal Data (Ref QE1 revised on 23<sup>rd</sup> March 2018).**

- All monthly checks made in respect of data held
- All data removed at the correct time
- Improvements on staff action plans
- Feedback from other staff
- Number of breaches reported

### **Job Description**

**Office Administrator Qerb Energy Ltd. Plymouth**

Permanent, Full time annualised hours

## Role Purpose:

The Office Administrator will undertake administrative tasks, ensuring the rest of the staff has adequate support to work efficiently.

The Office Administrator contributes to the smooth running of the company's offices and contributes in driving sustainable growth.

They are an ambassador for the company brand and reputation.

The Office Administrator has an excellent knowledge of MS Office and office management software.

The Office Administrator will report directly to the Office Manager.

## Key Accountabilities and Performance Indicators

### **Adherence to meeting and continuously improving productivity and service levels.**

- Achievement and improvement on service levels and productivity.
- Improvement through coaching against formalised plan.
- Progress through individual development plans.
- Customer surveys and feedback on trade websites

### **Achieve team targets by progress against set objectives and contributing on business issues at team meetings in addition to sharing best practice.**

- Achievement of team business development targets.
- Team feedback.
- Input at team meetings
- Example of best practice shared with others in team

### **Refers technical issues outside of knowledge and experience.**

- Nature and frequency of issues referred
- Feedback from Office Manager.

### **Helps identify shortfalls in process performances and works with other Qerb Energy Ltd. teams contributing to improvement related projects where necessary so that the continuous cycle of improvement is maintained.**

- Adherence to the customer feedback procedures.
- Feedback from team members on quality of involvement

### **Gains and maintain a comprehensive understanding of all regulatory matters relating to the smooth, efficient and compliant running of Qerb Energy Ltd. Follows all processes and procedures strictly as documented in the Company Policy in respect of Control of Personal Data (Ref QE1 revised on 23<sup>rd</sup> March 2018).**

- All data is processed with strict adherence to the guidelines set
- Number of breaches reported
- Number of concerns raised
- Knowledge of all regulatory requirements is updated where necessary and proven by completing the company tests of understanding

**QERB ENERGY POLICY FOR CANVASSING VIA DOORSTEP VISIT**

<b>DOC ID: QE2</b>	<b>Title: Canvassing via Doorstep visit</b>	<b>Print Date</b>
<b>Revision:</b>	<b>Prepared by: Karen Eley</b>	<b>Date Prepared: 22 March 2018</b>
<b>Effective date: 25 May 2018</b>	<b>Reviewed by:</b>	<b>Date Reviewed:</b>
	<b>Approved by:</b>	<b>Date Approved:</b>

<b>Policy</b>	We will ensure that anyone we meet as the result of doorstep canvassing will be treated like any other potential customer, with utmost courtesy and respect. Anyone who does agree to a follow up call or visit will understand our legal basis for processing their personal information and as a result will be asked to sign a form of consent. We will also ensure that anyone who does not want to be contacted again will not receive another visit at any time by Qerb Energy or its representatives.
<b>Purpose</b>	To ensure that we continue to treat all of our customers and those we come into contact with, with courtesy and respect and within their rights under the Data Protection Act, in particular as stated in GDPR.
<b>Scope</b>	Any person who receives a door step call from Qerb Energy or its representatives. All Qerb Energy staff or representatives making doorstep visits. All Qerb Energy office staff. All Qerb Energy Directors and key staff

<b>Responsibilities</b>	The Director of the company will ensure that all staff and representatives of the company are fully aware of the company policy in relation to doorstep canvassing and of the procedures that must be adhered to. The Data Protection Officer of the company will ensure that all policy and procedures are documented and reviewed and approved by the Director of the Company in line with the requirements of the GDPR.
<b>Background</b>	In response to the GDPR (General Data Protection Regulation) legislation which will apply from 25 <sup>th</sup> May 2018 this policy has been reviewed and the procedures clarified in order to remain compliant.

## Procedure

### **1.0 Preparation for doorstep canvassing**

- I. The Director of the Company will inform all staff or representatives that they will only be permitted to canvass at the doorstep from a previously prepared list of potential addresses, never at random.
- II. A spreadsheet of addresses to be canvassed will be prepared by Qerb Energy office staff using a suitable approved source such as the postcode list or the non-gas map which provides addresses or postcodes only and no other data which would make it possible to identify a person.
- III. The spreadsheet will be allocated to the Canvasser who will have been provided by the Director or his nominated person, full details of how to use it and how to deal with any outcomes.

### **2.0 The Doorstep visit**

- I. The Canvasser, working from the spreadsheet provided will establish that they are talking to the homeowner/tenant of the property and that the person concerned is over eighteen years of age and not a child
- II. They will explain the reason for their call and how more information can be provided if the person is interested in hearing more and by what means: phone call, another visit etc.

- III. They will explain that as a representative of Qerb Energy we are regulated by the FCA and compliant with the legislation known as GDPR. They will be able to provide further information in respect of GDPR if required
- IV. They will continue to explain that in order to contact them again, to give a fuller explain of the services we provide and of the suitability to that person, we need to collect some of their personal data such as their name, date of birth and age. We have elected to collect this data however only if they are happy for us to do this and to provide their written consent. The legal basis on which we operate for GDPR requirements is that of 'consent'. We will only retain this information for the time it is needed and they may withdraw this consent at any time.
- V. If the person concerned gives verbal consent he/she will be provided with a blank written consent form for completion (see attached example). They must only complete the consent form of their own accord and without persuasion other than general reassurance.
- VI. The Canvasser will ensure that the consent form is then held securely in the locked glove compartment or locked boot of their vehicle until it can be returned to Qerb Energy offices for scanning by office staff and the paper copy destroyed immediately by shredding.
- VII. If the person contacted states that they do not wish to be contacted again the Canvasser will note the address and assure the person that their address will be noted on our records to avoid any further calls. This information, which will not be personal data only holding an address, will also be passed to office staff on return .

## 2.0 The after work

- I. The Canvasser will hand all consent forms and details of addresses not to be called again to the Qerb Energy office staff
- II. Using the previously prepared list of potential addresses spreadsheet, they will add the details of anyone who wishes to receive a follow up contact, making arrangements for this to happen.
- III. Once the follow up contact has happened, they will return to this spreadsheet and delete the personal details either marking the spreadsheet as 'follow up contact on (date) not pursued'. Or 'follow up contact (date) resulting in (nature of work)' adding an estimated completion date for the work.
- IV. Qerb Energy Office staff will revisit the spread sheet on a weekly basis deleting the personal details relating to completed work and replace with the Job Reference no.
- V. The spread sheets used will be password protected and only used by allocated staff.
- VI. In all cases new staff will never view any information containing personal data until they have received full compliance training and passed the test of understanding.

Version 1.3 Privacy

Notice

May 2018 Version 1.3

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

o where you exercise your rights to make requests under data protection law. In some circumstance 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, will provide you with separate information showing you how we will process your data and the legal basis under which we are processing it.

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>1</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>2</sup> will:
  - o use and share your information in order to fulfil its statutory duties;
  - o if requested, share your information with the installer of the measure in order to verify whether it has been notified to Ofgem;
  - o if necessary, share your information with auditors contracted to ensure the integrity of the scheme.
  - o when required, disclose your personal information to the Secretary of State of the Department of Business, Energy and Industrial Strategy. They may use some of the data for research and statistical purposes and may, for these purposes, link the data with other data sources they hold.

<sup>1</sup> See the EST datamatch service: <https://datamatch.est.org.uk/> <sup>2</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/eco2t-privacy-policy> ECO Reporting Working Group

document. Amend where necessary to comply with relevant data protection laws.

May 2018 Version 1.3

- The obligated energy supplier<sup>3</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>4</sup> and in accordance with their own privacy policies);
- Relevant companies supporting the installation:
  - o the installer (who installs the measure); o the installer's certification body (who monitor a sample of installations to ensure they meet the correct standards); o technical monitoring agents (who monitor a sample of installations to ensure they meet the correct standards); o managing agents (who facilitate the funding and installation of measures) o external auditing agencies (who provide assurance that the data being processed is correct); o building control inspectors (who check installations are installed in accordance with building regulations); o guarantee companies (who provide warranties for some measures such as wall insulation); o the property owner, social housing provider, local authority or managing agent (as and where applicable); o software providers (who process your data).
- Anyone else where it is required by law, or we have your consent.
- The information you provide may be transferred to 3rd 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>5</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>6</sup>
- The Department for Business, Energy and Industrial Strategy, will hold some information, including your address, but not your name or other personal information, for up to 25 years for statistical purposes.

Your rights, including accessing your data or amending incorrect data You have certain rights<sup>7</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>8</sup>, see <https://ico.org.uk/concerns/>

**Name and address of the Controller (and Data Protection Officer):**

**Type of company (eg. installation, lead generation, supplier etc): Telephone: Email:**

3 Supplier details are available at:

<https://www.ofgem.gov.uk/environmental-programmes/eco/contacts-guidance-and-resources/supplier-contact-details> 4 The Electricity and Gas (Energy Company Obligation) (Amendment) Order 2017 5

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/> 6

<https://www.gov.uk/government/publications/hmrc-records-management-and-retention-and-disposal-policy/records-management-and-retention-and-disposal-policy> 7 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/> 8

The full reporting procedure is available online: <https://ico.org.uk/concerns/>, or you can call the ICO helpline on 0303 123 1113 ECO Reporting Working Group document. Amend where necessary to comply with relevant data protection laws.

## **Consent form for sharing data with the Energy Saving Trust**

We need to check you are eligible for the Energy Company Obligation (ECO) scheme. To do this, we would like to share your information with the Department for Work and Pensions (DWP) via the Energy Saving Trust (EST) who will verify whether or not you (or a member of your household) are receiving the relevant benefits to be eligible for the ECO scheme.

You do not have to consent to us sharing your information with EST. However, this will involve providing copies of documents providing proof of the benefits you are in receipt of from the Department for Work and Pensions.

For full information on what will happen to the data we collect about you, please see the Privacy Notice which we will have provided you with separately.

By ticking the box below, and providing your details, you agree to share this data with the Department for Work and Pensions via the Energy Saving Trust.

I agree to my information provided below being shared with the Department for Work and Pensions via the Energy

Saving Trust to confirm whether I am in receipt of the relevant benefits to be eligible for the ECO scheme.

**Title: First Name:**

**Surname:**

**Date of Birth:**

**Type of customer:**

**Main applicant Benefit recipient**

**Other (please specify) \_\_\_\_\_**

**Full Customer Address:**

**Telephone no: Email:**

**Customer's preferred contact method (please tick the relevant box)**

**Telephone: Email: Signature: Date:**

Energy Saving Trust Datamatch service for ECO <https://datamatch.est.org.uk> Effective from 25 May 2018

## **Processing special categories of personal data under ECO - Consent Statement**

**Name and address of the Controller:**

**Type of company (eg. installation, lead generation, supplier etc): Telephone: Email:**

Why we want your data Under the Energy Company Obligation (ECO) scheme large energy suppliers provide funding towards energy efficiency measures installed into domestic homes. In order for you to have a measure installed into your home under the ECO scheme you have to meet the eligibility criteria.

You may be eligible for the scheme if you receive disability benefit. If you want to prove that you are eligible for the scheme because you receive disability benefit, then we need to collect some information regarding this eligibility. As disability benefit is a special category of data we require your explicit consent to hold and process this. If you do not consent to share this information we will be unable to proceed with the proposed energy efficiency measure.

What we will do with your data We will share your disability benefit information with an Obligated Energy Supplier<sup>1</sup> (who will contribute towards the cost of your measure) to prove that you are eligible for the scheme. We will also keep a copy of your data in case we are audited. The information will not be shared with any unnecessary third parties and your data will be protected at all times.

For full information on what will happen to other data we collect about you, please see our Privacy Notice which we will provide you with separately. The Obligated Energy Supplier who ultimately provides funding towards the energy efficiency measure may also provide you with their Privacy Notice.

Withdrawing your consent You can withdraw your consent at any stage and we will delete the information we hold about your disability benefit. Please note however that if you withdraw your consent before the measure is installed we will be unable to prove you are eligible for the scheme so you will be ineligible to receive an energy efficiency measure under ECO.

Please continue overleaf if you are happy to sign the consent statement.

1 The Electricity and Gas (Energy Company Obligation) (Amendment) Order 2017

For Customer Use

**Please tick the box below if you consent to us using your data in the manner outlined.**

I agree to my information being collected in order prove I am eligible to have a measure installed under the ECO scheme.

**Title and full name of customer: Full customer address:**

**Signature:**

**Date:**