

Green Homes Grant Local Authority Delivery Scheme

Data Controller: Runnymede Borough Council, Civic Centre, Station Road, Addlestone, Surrey, KT15 2AH www.runnymede.gov.uk

Data Protection Officer: Natalie Lacey, dpo@runnymede.gov.uk

Introduction

We receive and process personal data relating to your application for a Green Homes Grant (GHG) to fulfil our role as the local authority delivering the scheme. We are committed to being transparent about how we collect and use this data and meet our data protection obligations.

This notice relates to data collected under this scheme which is operated by Runnymede Borough Council via our delivery partner Happy Energy Solutions Ltd which is funded by the Green Homes Grant Local Authority Delivery Scheme (GHG LAD) run by the Department for Business, Energy and Industrial Strategy.

What personal data do we collect?

We receive and process a range of personal data. This includes:

Customers:

- Address and details of property receiving the GHG LAD installation(s)
- Details about the GHG LAD installation(s) installed at the property, including type, size and cost
- Contact address (if not the property receiving the GHG LAD installation(s))
- Address and details of property offered, but not receiving, the GHG LAD installation(s)
- Your name
- Household income and any other scheme eligibility information such as benefit entitlement. This may include special category data for example when a benefit you are receiving indicates a disability or health condition.
- Any financial contribution you have made towards the GHG LAD installation(s)
- Details about the expected energy, carbon and cost savings expected to be delivered by the installation, including pre- and post-installation property EPC details where appropriate
- Email address Optional
- Phone number Optional however may delay application process



Installers:

- Your name
- Relevant accreditation and registration information
- Contact address
- Email address
- Phone number
- Details of GHG LAD installations delivered
- Whether directly contracted or sub-contracted by LA to install GHG LAD installations
- The number of employees in your organisation
- Confirmation of eligibility under funding criteria

We collect this information via our delivery partner Happy Energy Solutions Ltd.

Why do we process personal data?

The purpose(s) for which we are processing your personal data is to support the delivery and administration of the Green Homes Grant Local Authority Delivery Scheme (known as the Scheme). We deem processing your personal data to be necessary for the performance of a task carried out in the public interest.

Delivery and administration of the Scheme may require linking of your data to other datasets held by us or the Department for Business, Energy and Industrial Strategy (BEIS). This may include processing of special category data, for example where your eligibility relates to special category data such your health.

The lawful basis for us to process this special category data and share the information with BEIS, will be your explicit consent (Article 9 (2) (a) of the GDPR) where the personal data is not essential for establishing eligibility for the scheme. Where the special category data is necessary for establishing eligibility for the scheme the lawful basis for processing and sharing this data will be substantial public interest (Article 9 (2) (g) of the GDPR), specifically statutory and governmental purposes (Part 2, section 6 of the DPA 2018).

BEIS will be conducting an evaluation of the Scheme. This may include you being contacted to take part in further research. Where the research involves processing of personal data in addition to that already collected for delivery of the Scheme, you will be given the opportunity to opt-in to that research at the point of contact.

Your data may also be used for statistical, research and fraud prevention purposes.

The specific public task is the delivery, administration and evaluation of, as well as statistical, research and fraud prevention purposes relating to, the Scheme, a government funded scheme aiming to raise the energy efficiency of low energy performance homes (those rated at EPC Band E, F or G), including off-gas grid



homes. Funding is provided to Local Authorities who engage consumers and manage the delivery of installations in homes.

Who has access to your personal data?

Your personal data will be shared with:

- The relevant installer
- Happy Energy Solutions Ltd
- The Department for Business, Energy and Industrial Strategy (BEIS) and its contractors for delivery, administration and evaluation of the scheme, statistical, research and fraud prevention purposes.
- Ofgem and delivery partners of central and local government home energy schemes such as the Energy Company Obligation and Renewable Heat Incentive

Your personal data may also be shared with other Government departments where necessary.

We may share your data if we are required to do so by law, for example by court order or to prevent fraud or other crime.

As your personal data will be stored on our IT infrastructure it will also be shared with our data Happy Energy Solutions Limited

Personal data shared with BEIS will be stored on their IT infrastructure and will therefore also be shared with their data processors Microsoft and Amazon Web Services.

We will not transfer your data to countries outside the European Economic Area.

However as personal data shared with BEIS will be stored on their IT infrastructure, and shared with their data processors Microsoft and Amazon Web Services, your data may be transferred and stored securely outside the European Economic Area. Where that is the case it will be subject to equivalent legal protection through the use of Model Contract Clauses.

How do we protect personal data?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its authorised employees or individuals working on behalf of the Council in the performance of their duties.



How long do we keep your personal data?

How long we keep information will depend on the specific reason we are processing the data. We will keep your data for as long as necessary for the purpose it was provided or to comply with the law. Some information will be kept longer to understand decisions that have been made.

Your personal data will be stored securely by us for a maximum period of one year after the scheme has closed...

Your personal data will be stored securely by BEIS for a maximum period of 25 years following the close of the Scheme. BEIS may choose to store anonymised data beyond this period.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (known as a subject access request)
- require us to change incorrect or incomplete data
- ask us to delete or stop processing your data, for example where the data is
 no longer necessary for the purposes of processing. Where possible we will
 seek to comply with your request, but we may be required to hold or process
 information to comply with a legal requirement.
- in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.
- object to the processing of your personal data in certain circumstances. We may still be required to hold or process information if there are legitimate grounds for doing so.
- withdraw consent to the processing of your personal data at any time, where processing is based on your consent

You can make a subject access request by following the instructions for making a subject access request on our website.

To contact us about any of your other data protection rights, please contact the <u>Data</u> Protection Officer.

If you believe that Runnymede Borough Council has not complied with your data protection rights, you should initially contact our Data Protection Officer and if dissatisfied with the outcome you can make a complaint to the Information Commissioner. You can find out further information on making a complaint to the Information Commissioner on their website www.ico.gov.uk.