

Happy Energy Solutions Ltd

ECO4 and The Great British Insulation Scheme

Information & Privacy Notice



Introduction

Under the Energy Company Obligation (ECO) and The Great British Insulation Scheme (GBIS) 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 or the GBIS 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.

What is ECO and GBIS?

ECO and GBIS are Government schemes funded by energy suppliers, to make homes more energy efficient and reduce the energy bills of eligible households.

Am I Eligible for ECO or GBIS Funding?

If you own or privately rent your home, there are two ways of being eligible for an ECO or GBIS grant, either to be in receipt of an income related benefit, or your local authority can sign a special approval letter if you meet criteria, known as Flexible Eligibility, or ECO Flex for short.

If you are a tenant of a social housing property, you will be eligible for an ECO or GBIS grant if home has an Energy Performance Rating of D or below; and your home is rented below the market rate.

The personal data we collect and use

In order for Happy Energy Solutions Ltd to confirm your eligibility for grant funding and where needed, for your local authority to sign the necessary document, we need to be provided with evidence that you meet the eligibility criteria. This may include evidence of income*, copies of official letters, evidence of dates of birth and in some cases, evidence of residency, such as a council tax bill, or utility bill or bank statement etc, or medical information**.

***Note Regarding Income** - If you are asked to provide evidence of your income, this must be for all adults in the home, including all benefits that may be received. The income eligibility route requires your total household income (before tax or any other deductions) to be £31,000 or less. This figure only applies if you have been asked to provide income evidence.

**Medical Condition Eligibility

In some cases, you may be eligible for an ECO or GBIS grant based on a medical condition that you or someone living in your home has. When this is the case, you need to provide us with evidence of the medical condition, which then needs to be reviewed by a qualified doctor (GP) who is then able to sign a declaration which can be used to verify your eligibility.

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 or GBIS scheme.

What will Happen with my Personal Data?

In order for you to receive an ECO or GBIS grant, you must provide evidence, which will be shared and processed by a number of different organisations. These may include;

- The installers who carry out any works on your home;
- If necessary, the Department for Work and Pensions will profile your data in order to provide a YES/NO response via the Energy Saving Trust¹ to verify whether or not you receive the relevant benefits to be eligible for the scheme;
- If necessary, a Registered GP to sign a declaration used to verify your eligibility for a grant;
- Companies providing survey and inspection services;

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- Your local authority (which may include regional authorities);
- The energy supplier who provides the grant;
- Ofgem (The Government department which manages ECO and GBIS);
- The Department for Energy Security & Net Zero (DESNZ);
- TrustMark;
- Industry certification and accreditation bodies;
- Providers of software or online data storage companies;
- Guarantee Companies, who provide warranties for some measures;
- The property owner, social housing provider, local authority or managing agent (where applicable);
- Creditsafe, which provide a 'soft credit check' address verification service to Happy Energy Solutions Ltd, to confirm who is on the electoral register at your property for income purposes (this will not leave a footprint on your credit file);
- 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 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, are in place to protect your data before any transfer takes place;
- Your data will only be processed for purposes relating to ECO or GBIS scheme, unless you have specifically consented otherwise.

How Long will my Data be Stored for?

Your data will need to be securely retained for as long as is reasonably required to meet the obligations of the ECO and GBIS scheme.

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 2

The Department for Energy Security & Net Zero, 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.

Who is the Data Controller?

Happy Energy Solutions Ltd, is the Data Controller for your information.

Using your personal data: legal basis and purpose

We will process your personal data:

- As necessary to fulfil our contract with you, e.g.
 - to manage and undertake the contract (including the installation of a measure into your property).
- As necessary to pursue our legitimate interests, e.g.
 - to check you are eligible for the ECO or GBIS scheme;
 - to share your data with third parties who administer, support or enforce the ECO / GBIS scheme (as specified under 'Sharing your personal data').

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- to collect the financial amount you have contributed towards the cost of the installation.
- As necessary to comply with a legal obligation, e.g. where you exercise your rights to make requests under data protection law.

In some circumstances we may need to process special categories of data (e.g. 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.³

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.

Your rights, including accessing your data or amending incorrect data

You have certain rights⁵ 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)⁶, see <https://ico.org.uk/concerns/>

Name and address of the Controller (Data Protection Officer):	
Louise Johnson Happy Energy Solutions Ltd Unit 1 New Road Perranporth TR6 0DL	
Type of company (eg. installation, lead generation, supplier etc): Installation Company	
Telephone: 0800 024 8000	Email: louise.johnson@happyenergy.co.uk

¹ <https://energysavingtrust.org.uk/privacy>

² HM Revenue and Customs record management policy

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

⁴ Article 9(2)(g), section 10(3), Part 2 to Schedule 1, paragraph 19 to the DPA 2018.

⁵ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

⁶ <https://ico.org.uk/concerns/>, or you can call the ICO helpline on 0303 123 1113