

How we will process your personal data

Happy Energy Solutions Ltd is the delivery partner for the Mayor of London's Warmer Homes programme and we are the Data Controller for any information you provide us. In order to assess your eligibility for Warmer Homes and other funding and to make all necessary arrangements for any surveys or works to be completed, we will need to securely share all data that is provided to us with a number of other organisations, this will include (but may not be limited to):

- If you live in the boroughs of Barking and Dagenham, Barnet, Camden, City of London, Enfield, Hackney, Haringey, Harrow, Havering, Hillingdon, Hounslow, Islington, Newham, Redbridge, Tower Hamlets, or Waltham Forest, we will need to share your data with Islington Council
- If you live in the boroughs of Bexley, Bromley, Greenwich, Kingston upon Thames, Lambeth, Lewisham, Merton, Richmond upon Thames, Southwark, Sutton, and Wandsworth, we will need to share your data with Lewisham Council and their agents, Thinking Works and South East London Community Energy (SELCE)
- If you live in the borough of Croydon, we will share your data with Croydon Council and their agent, Groundwork London
- If you live in the boroughs of Brent, Ealing, Hammersmith and Fulham, Kensington and Chelsea or Westminster, we will need to share your data with Kensington and Chelsea Council and their agent, Groundwork London
- We may also need to share your data with your own local authority where they can provide additional grant funding for your works and for reporting purposes
- Any companies which undertake surveys or installation works on behalf of Happy Energy Solutions Ltd
- An energy supplier who may provide funding for your works through the Energy Company Obligation (ECO) - (we will write to you after any works have been completed to tell you which energy supplier has received your data)
- Ofgem, who administer the ECO scheme on behalf of the Government
- Companies who provide software to enable the grant and works to be completed including Industria Systems UK Ltd
- Companies who may be required to visit your home to inspect the quality of the works on behalf of us or anyone who may provide funding towards the works
- Certification bodies where the works may need to be registered including the Gas Safe register, MCS register and Trustmark
- Charities or other organisations who may be able to offer additional grant funding for your works
- The Energy Saving Trust, who will submit information to the Department of Work and Pensions to provide a yes/no answer as to whether any benefits you receive make you eligible for these grants
- Companies which provide guarantees for any works including product manufacturers
- The Mayor of London (Greater London Authority)

As part of the application process, we need to ask for information about the health of people living in your home, this is known as Special Category Data, by ticking the consent box on the online application form, or when you gave the person completing the form on your behalf permission to do so, you have given your explicit consent to allow us to ask about and process this Special Category Data.

Please ensure that you have the permission of any other person who lives in your home and whose data you will be sharing.

It is a requirement of the ECO grant scheme that we provide you with the privacy notice which makes up the next 4 pages of this document

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.¹ 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.² 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 Trust³ to verify whether or not you receive the relevant benefits to be eligible for the scheme;
- The Office of Gas and Electricity Markets (Ofgem)⁴ 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 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 supplier⁵ (who will make a contribution towards the cost of the measure; and will process data as necessary to comply with a legal obligation⁶ 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);
 - Trustmark, who operate a Data Warehouse where records of all works and guarantees must be uploaded.

1 Article 9(2)(g), section 10(3), Part 2 to Schedule 1, paragraphs 5 and 6 to the Data Protection Act 2018 (DPA2018).

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

3 Energy Saving Trust privacy policy

4 Ofgem privacy policy

5 ECO supplier details

6 The Electricity and Gas (Energy Company Obligation) Order 2018

- 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 ICO⁷, 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 management⁸
- 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 rights⁹ 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)¹⁰, see <https://ico.org.uk/concerns/>

Name and address of the Controller (and Data Protection Officer): Louise Johnson – Chief Administrative Officer Happy Energy Solutions Ltd Tintagel House, Albert Embankment, SE1 7TY	
Type of company (eg. installation, lead generation, supplier etc): Installer and programme manager	
Telephone: 020 8075 5800	Email: contact@wamerhomes.london

7 [ICO guide for data being transferred outside of the European Economic Area](#)

8 [HM Revenue and Customs record management policy](#)

9 [A list of your rights under the GDPR](#)

10 [ICO complaints and reporting procedures](#), or you can call the ICO helpline on 0303 123 1113

SPECIAL CATEGORY DATA PROCESSING	
Purpose	Provision of Grant Funding
Lawful basis for processing personal data	Article 6(1)(b) of the GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legal obligation: The Electricity and Gas (Energy Company Obligation) Order 2018
Special category of personal data	Data concerning health. This data may also include another special category of personal data.
Basis for processing special category of data	Art. 9 (2)(a) (including the Data Protection Act 2017). GDPR Processing of special categories of personal data <ol style="list-style-type: none"> 1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited. 2. Paragraph 1 shall not apply if one of the following applies: <ol style="list-style-type: none"> a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.
How is data collected?	You, or your representative, an application form, an internet based application form, an employee of the company, as appropriate.
How is data stored?	Primarily electronically on secure physical or cloud based systems, but also secure e-mail or equivalent, your customer record, hard drive and other paper filing systems as relevant and necessary. Physical application forms and applicant information are also stored at our offices securely.
How long is data stored?	This will depend on the nature of the data and the filing system. For example, Ofgem administration rules dictate that our records be kept for up to 7 years, whereas some data may be kept for longer depending on prevailing legislation.
To whom do you provide the data (recipients)? (including processors)	As per Privacy Notice.