

# Green Homes Grant Sustainable Warmth: Local Authority Delivery Phase 3 & Home Upgrade Grant Phase 1 GDPR Privacy Notice



## Privacy Notice

This notice sets out how Surrey County Council as the lead authority on behalf of the consortium of the following local authorities Elmbridge Borough Council, Epsom & Ewell Borough Council, Guildford Borough Council, Mole Valley District Council, Reigate & Banstead Borough Council, Runnymede Borough Council, Spelthorne Borough Council, Surrey Heath Borough Council, Tandridge District Council, Waverley Borough Council, Woking Borough Council and Surrey County Council will use your personal data, and your rights. It is devised under Articles 13 and/or 14 of the General Data Protection Regulation (GDPR).

This notice relates to data collected under the Sustainable Warmth Scheme, under the Greater South East Net Zero Hub Retrofit Project, operated by Cambridgeshire & Peterborough Combined Authority (CPCA), which is funded by the Department for Business, Energy and Industrial Strategy. The project is managed by Action Surrey on behalf of Surrey County Council. Action Surrey is an energy efficiency advice service established by Surrey local authorities and operated by ThamesWey Sustainable Communities, a company wholly owned by Woking Borough Council.

## YOUR DATA

### The data

We will process the following personal customer data, which will be shared with BEIS by the CPCA:

- Address and details of property receiving the Sustainable Warmth installation(s)
- Details about the Sustainable Warmth installation(s) installed at the property, including type, size and cost
- Contact address (if not the property receiving the Sustainable Warmth installation(s))
- Address and details of property offered, but not receiving, the Sustainable Warmth installation(s)
- Your name
- Household income and any other scheme eligibility information
- Any financial contribution made towards the Sustainable Warmth installation(s) from landlords or other third parties.
- Property data, including pre-and post-Energy Performance Certificate Data (EPC) information, SAP or RdSAP assessments with scores, expected carbon, energy and cost savings.
- Email address (optional)
- Phone number (optional)
- Customer satisfaction surveys

Supported by:



Energy Centre, 9 Poole Road,  
Woking, GU21 6DY

[www.actionsurrey.org](http://www.actionsurrey.org)  
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We will process the following installer data:

- Name of company
- Relevant accreditation, insurance and registration information
- Contact address
- Email address
- Phone number
- Details of Sustainable Warmth installations delivered
- Whether directly contracted or sub-contracted to install Sustainable Warmth installations
- The number of employees in the organisation

## Purpose

The purpose(s) for which we are processing your personal data is to support the delivery and administration of the grant project.

Delivery and administration of the Scheme may require linking of your data to other datasets held by Surrey County Council or the Department for Business, Energy and Industrial Strategy (BEIS).

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.

## Legal basis of processing

The legal basis for processing your personal data is to deliver the grant scheme:

a) **Consent:** You consent to us doing so. Use of your data to contact you to take part in further research will be subject to your consent.

(b) **Legal obligation:** It is necessary to comply with a legal obligation placed on us as the data controller

**Public task:** Processing is necessary for the performance of a task carried out in the public interest. 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 D, E, F or G), including off-gas grid homes. The Government funding is provided to Local Authorities who set up arrangements for consumer engagement and the delivery of installations in homes.

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## Recipients

Your personal data will be shared with:

- Relevant installers on the Action Surrey network of vetted installers who can carry out the works through a referral process.
- ThamesWey Sustainable Communities Ltd, as the operator of Action Surrey.
- Surrey County Council as the lead authority participating in the project.
- 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.
- The Cambridgeshire and Peterborough Combined Authority (CPCA).
- CPCA consortia partners in the Innovate UK Modernising Energy Data Applications, U:SMART:ZERO project (or its successor). This is a research and development project to identify households most in need of sustainable and affordable homes.
- Ofgem and delivery partners of central and local government home energy schemes such as the Energy Company Obligation and Renewable Heat Incentive.
- Research organisations working on approved projects for public interest benefit research purposes. Your data will be stored securely at a data archive and made accessible through a secure environment to accredited UK researchers working on approved research projects.
- 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.

## **INTERNATIONAL TRANSFERS**

As your personal data will be stored on our IT infrastructure it will also be shared with our data processors: Zoho Corporation, based in the USA.

The data the CPCA collects will be stored on a Customer Relationship Management (CRM) system whose servers are based in the USA. For further details, please contact the Authority's Data Protection Officer.

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. Therefore your data may be transferred and stored securely outside the UK and European Economic Area. Where that is the case it will be subject to equivalent legal protection through the use of Model Contract Clauses.

## Retention

Your personal data will be stored securely by us for a maximum period of 25 years following the close of the scheme to align with the normal guarantee period for wall

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insulation.



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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.

## Data Collection

We may use different methods to collect personal data, including the following:

- You provide us with personal data directly, for instance by filling in online forms requesting this information.
- We obtain personal data from publicly available sources, e.g. Companies House, HM Land Registry.

## Data Security Collection

We have put in place appropriate physical and technical measures to safeguard the personal data we collect. Save where additional consent is obtained, we limit access to personal data to those employees, agents and contractors and other third parties requiring it on a need to know basis.

However, please note that although we take appropriate steps to protect personal data, no device, computer system, transmission of data or wireless connection is completely secure and therefore we cannot guarantee the absolute security of personal data shared with us over the internet.

## **YOUR RIGHTS**

You have the right to request information about how your personal data are processed, and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.

You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

You have the right to object to the processing of your personal data.

You have the right to withdraw consent to the processing of your personal data at any time, where processing is based on your consent.



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Where the processing is based on consent, or where it is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the data subject's request prior to entering into a contract:

You have the right to request a copy of any personal data you have provided, and for this to be provided in a structured, commonly used and machine-readable format.

## HOW TO MAKE A REQUEST

If you wish to make a request associated with any of the rights listed above, contact Action Surrey, Surrey County Council, CPCA, or BEIS, using the contact details at the bottom of this notice.

## CONTACT DETAILS

The data controllers for your personal data are Action Surrey, Surrey County Council and the Department for Business, Energy and Industrial Strategy (BEIS).

You can contact the Action Surrey Data Protection Officer at:

ThamesWey Group Ltd  
The Energy Centre  
Poole Road  
Woking  
GU21 6DY  
Email: [gdprregister@thamesweygroup.co.uk](mailto:gdprregister@thamesweygroup.co.uk)

You can contact the Surrey County Council Data Protection Officer at:

Heidi Judd  
Data Protection Officer  
Surrey County Council  
Woodhatch Place  
11 Cockshot Hill  
Reigate  
RH2 8EF  
Email: [DPO@surreycc.gov.uk](mailto:DPO@surreycc.gov.uk)

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You can contact the CPCA Data Protection Officer at:

CPCA  
72 Market Street  
Ely  
Cambridgeshire  
CB4 7LS  
Email: [dpo@cambridgeshirepeterborough-ca.gov.uk](mailto:dpo@cambridgeshirepeterborough-ca.gov.uk)

You can contact the BEIS Data Protection Officer at:

BEIS Data Protection Officer  
Department for Business, Energy and Industrial Strategy  
1 Victoria Street  
London  
SW1H 0ET  
Email: [dataprotection@beis.gov.uk](mailto:dataprotection@beis.gov.uk)

## COMPLAINTS

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

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