

HEET PRIVACY NOTICE

WHO WE ARE

Home Energy Efficiency Training Ltd (HEET) is a registered society under the Co-operative and Community Benefit Societies Act 2014 registration number 28988R. We are a not-for-profit organisation working in the London boroughs of Waltham Forest, Redbridge and Enfield. Our mission is to "Work with the community to make the homes of local people safe and healthy with affordable fuel bills and low carbon emissions".

This Notice explains when and why we collect personal information about people. It explains how we use the personal information we collect, the conditions under which we may disclose it to others and how we keep it secure.

PRIVACY STATEMENT

The Data Protection Act and General Data Protection Regulations (GDPR) identify a set of principles which form the basis of how HEET will use your information. These are:

- Process all personal information lawfully, fairly and in a transparent manner
- Collect personal information for a specified, explicit and legitimate purpose
- Ensure that personal information processed is adequate, relevant and limited to the purposes for which they are collected.
- Ensure that personal information is accurate and up to date
- Keep your personal information for no longer than is necessary for the purpose(s) for which they were collected
- Keep your personal information securely using appropriate technical or organisational measures.

HEET is registered with the Information Commissioner's Office and we take our obligations under data protection regulation, and our obligation to protect the data of the people we are here to help, seriously.

We welcome any questions about how we process and safeguard your data and will be happy to respond to any requests or concerns regarding your data rights. Please contact us:

Email: info@theheetproject.org.uk

WHO WE COLLECT PERSONAL INFORMATION ABOUT AND WHY?

We use personal information to deliver our services and in the day to day running of the organisation. This includes reporting to funders, complying with the law with regards to accounting records and performing our duties as a registered society under the Co-operative and Community Benefit Societies Act 2014. We sometimes work with trained volunteers to support the delivery of our projects and services. In the course of their work, these volunteers may collect, process, or handle personal information on our behalf. All volunteers are required to handle personal data as outlined in HEET's Privacy Notice.

Specifically, we collect and use personal data from the following groups:

SERVICE USERS – If you access, or have accessed, HEET’s energy-saving, home security or handy person service your details will be recorded on HEET’s database and other systems. This means we can assess your eligibility for our services, give advice and support, identify other services that could help and evaluate the support we provide. The information we collect includes:

- Name, address, phone numbers and email
- Date of birth of main service user and age of other family members
- Income or receipt of welfare benefits/tax credits
- Information about physical or mental health of you or your family
- Racial or ethnic origin
- Housing tenure
- Details relating to energy performance of your home and maintenance issues relating to your home
- Details of your current fuel supplier and energy tariffs
- Information about goods and services you have been provided with

FAMILY MEMBER, FRIEND OR NEIGHBOUR OF SERVICE USER – If you are acting as a third party contact for a service user we will record your contact details (name, address, phone and email) so that we can provide a service to the user on whose behalf you are acting.

PARTNERS – HEET works closely with other organisations to deliver our work or to refer service users to access further support. Contact details of representatives of these organisation, including records of their correspondence with HEET, is recorded on HEET’s systems so that we can administer our business.

HEET MEMBERS – All staff and trustees are members of the registered society and we collect personal information when you become a member. We may, at times, be legally required to share this information with our funders and regulatory bodies.

WEBSITE USERS - If you are a visitor to our website, www.theheetproject.org.uk, we will only keep your data if you use our contact form, you make a referral or you make a payment via our Donate page. The data we keep will be the information you provide in the contact form. If you make a payment to HEET via our website, this is processed by PayPal, a third party, whose processes comply with GDPR.

If recording and using your information is vital to the service we are offering you, we will notify you that we are collecting this data but will not specifically request your consent. We do ask for your consent though if we want to use your information in a way that is not essential to our service. An example of this would be using any information about you for a case study in a report or contacting you at a later date if a new service or grant becomes available.

JOB APPLICANTS - When you apply for any of our vacancies, we store the information you provide on your application and in your interview for the time required to complete our recruitment process, and for a period of one year afterwards for the purpose of any future recruitment rounds and in line with recommendations around discrimination claims. We will only ask you for information relevant to the role and to meet our obligations as an employer. If your application is successful and you come to work with us, we will process and store your personal information in accordance with our data protection policy.

During recruitment, we currently collect and process the following information:

- Your application form and personal statement
- Your contact details
- Anonymised equal opportunities data

If we make you a conditional offer for a position with us, we will also collect and process:

- Your references
- Your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us

HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT

The personal information we process is provided to us directly by you for the purposes of recruitment, and by your nominated referees whose details are supplied by you. We use the information that you have given us in order to complete our recruitment process.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- a legitimate interest
- a legal obligation.

HOW WE STORE YOUR DATA

The security and storage of your data is of utmost importance to us. We hold personal data on our mail servers (in the form of emails), computers and paper records.

- Computers are password protected and kept in a locked office. Information stored on mail servers is stored on a secure server which is protected by firewalls and access controls.
- Paper records are all kept in the locked office
- All mobile devices, such as ipads or mobile phones, used to record personal data will be pin number security protected. Any data collected on a mobile device will be transferred onto a password protected office computer and deleted from the mobile device as soon as possible.
- When personal information is transferred to a third party (e.g. a funder – see data sharing below) we will anonymise that data wherever possible. If data is sent electronically it will be encrypted or password protected. We will only share data with organisations with whom we have a data sharing agreement so that we know that they will also be using your data legally and appropriately.

We will always seek to keep your data for the minimum time necessary.

- Where we have carried out work to your home, we will keep your contact details, and details of the work that we have carried out for 7 years from the date of our most recent visit.
- We will keep information about transactions relating to finances and grants for the statutory minimum of 7 years.
- If you give your consent we will keep the information about you until you withdraw your consent. (Please note that if we have another basis for keeping your data such as a legal requirement we may have to keep your data longer.)

- If you are a HEET member, we will remove your details from our system within a year of your resigning your membership, unless it is being held for other legal purposes.

DATA SHARING & CONSENT

Your information will not be used or passed on to other organisations for promotional or marketing purposes.

There are times when HEET is contractually or legally obliged to share your personal information with a third party. If this is the case we will notify you that we are sharing your data but will not specifically ask for your consent. If you are a service user, for example, HEET will let you know before any work is carried out that we are required to share your data with organisations that fund or subsidise that work. If you do not want us to share your information in this way, we will unfortunately not be able to provide you with a service. If you are a member of HEET Ltd, we will need to share your personal data when reporting to the Financial Conduct Authority and we will make you aware of this when you become a member.

When it is useful to you or us to share your data, but it is not essential, we will ask for your consent. HEET, for example, sometimes uses sub-contractors to carry out gas safe or electrical work. We will seek your consent before sharing your information with these contractors and will only pass on the minimum information required for them to carry out the requested work. HEET will ensure that all companies we use comply with regulations regarding how they keep your information secure.

Sometimes it is useful to share your information with a third party that provides a service that is independent of HEET. In these cases HEET will not have control over the organisation we are referring to and how your information is managed. An example might be a referral to your energy supplier so you can benefit from being on their Priority Service Register. When a referral like this could be useful to you, we will:

- Name the organisation(s) we are recommending and the services they offer
- Provide you with the organisation(s) contact details
- Offer you the option of contacting them directly yourself
- Seek your consent if you want us to make a referral

HEET may use trusted third-party data processors to perform certain functions on our behalf, such as an SMS messaging services (Firetext) and online form builders (Jotform). These processors are obligated to handle your data securely in accordance with our instructions. In line with ICO guidance we ensure that all data processing agreements comply with UK GDPR requirements.

In some cases, we may collect, and process special category data as defined under UK GDPR. This may include information relating to health and ethnicity. We will only process such data where it is necessary, and we have obtained your explicit consent, or where the processing is otherwise legally permitted under UK GDPR. We will request your explicit consent in a clear and specific manner when collecting any special category data. You have the right to refuse or withdraw at any time. You can update or withdraw your consent and change your preferences by contacting us on either:

Phone: 020 8520 1900

Email: info@theheetproject.org.uk

Post: Trinity URC, 58 Orford Road, London, E17 9QL

Withdrawing your consent will not affect the lawfulness of any processing carried out before you withdraw consent.

WHAT RIGHTS DO I HAVE OVER MY DATA?

You have rights over your personal data. You can:

- ask for a copy of your information;
- ask for information to be corrected;
- ask for information to be erased or deleted;
- ask for us to limit or restrict processing;
- object to us processing your data, in particular where we use the data for direct marketing, including profiling for direct marketing purposes. The right to object does not apply if we must process the data to meet a contractual or legal requirement;
- ask us to send you a copy in a structured digital format or ask for us to send it to another party.

Some rights, however, may be limited. We may be obliged by law or regulation to keep information. We must respect other people's privacy as well, which means we may need to redact or remove information where it includes personal data about someone else, even if it is connected to your data. On occasion there may be a compelling legitimate interest to keep processing data.

If you want a copy of your data, to object to how we use your data, or ask us to delete it or restrict how we use it or, please email info@theheetproject.org.uk. To process a request from you, we may need to confirm your identity to ensure we are accessing the right data.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at info@theheetproject.org.uk or write to us at: HEET office, c/o Trinity URC, 58 Orford Road, London E17 9QL.

You can also complain to the ICO if you are unhappy with how we have used your data:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>

CHANGES TO THIS POLICY

We may change this Policy from time to time so please check our website occasionally to ensure that you're happy with any changes.