Affordable Warmth Solutions CIC

General Privacy Notice

1 Introduction

1.1 We respect your privacy and are committed to protecting your personal data.

1.2 This privacy notice tells you how we look after personal data**,** about privacy rights and how the law protects individuals. It explains how we collect and processes personal data, including any data you may provide through our Website (regardless of where you visit our Website from).

1.3 It is important that you read this privacy notice together with:

(a) any specific privacy notice or fair processing notice we may provide on specific occasions when we collect or process personal data; and

(b) the terms of any contract you may have entered into with us;

so that you are fully aware of how and why we are using personal data. This privacy notice supplements but does not override any specific privacy or fair processing notice or applicable contract terms. Where anything stated in a specific privacy or fair processing notice or contract you have entered into with us is different from the matters set out in this privacy notice, that specific notice or contract will override this notice.

1.4 Some of the personal data we use is not obtained directly from individuals. We also use information readily available from public sources and obtain personal data from third parties, such as:

(a) housing associations and local authorities; and

(b) entities to which we have provided financial assistance.

We may use this personal data to help us identify households that may be in fuel poverty, to establish whether those households are in fuel poverty, to offer assistance to qualifying households in connection with the alleviation of fuel poverty and the consequences of fuel poverty. We may also use this personal data for verification, reporting and audit purposes in relation to our services or funding we provide or administer. In some cases, this includes limited sharing of personal data with National Grid (as the provider of the Warm Homes Fund) and with government departments and regulatory or other public bodies with responsibilities relating to energy or the alleviation of fuel poverty.

1.5 Some of the households we contact may not be in fuel poverty or may not otherwise qualify for support. Some may simply not wish to be contacted further. This privacy notice tells anyone who is contacted by us what they need to know about how their personal data is used and their rights in relation to that use.

1.6 Unless a specific privacy or fair processing notice we have given to you or contract you have entered into with us states otherwise, we are the data controller in relation to personal data you provided to us or that we otherwise use.

1.7 We have appointed a data privacy manager who is responsible for overseeing matters relating to this privacy notice and our use of personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our data privacy manager using the details set out below.

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1.8 Affordablewarmthsolutions.org.uk ('our Website') is a site owned and operated by Affordable Warmth Solutions CIC. This privacy notice forms part of the conditions of use of our Website. You can find those conditions in our Website **Terms and Conditions of Use**.

1.9 Our Website and the services we provide are not intended for children. We do not knowingly collect data from children. We do not knowingly collect data relating to children other than data on the number of children living at an address and data to confirm school year, any receipt or free school meals and presence of a qualifying health condition where relevant in establishing whether a household is in fuel poverty or otherwise qualifies for assistance.

1.10 The expressions "we", "us" and "our" used in this privacy notice mean Affordable Warmth Solutions CIC (company number 06778194).

2 Information we collect

2.1 Personal data, or personal information, means any information relating to an identifiable person. It does not include data where the identity has been removed (anonymous data).

2.2 We may collect, use, store and transfer different kinds of personal data. which we have grouped together follows:

(a) **Identity Data**, including first name, maiden name, last name, username and passwords or similar identifier, marital status, title, date of birth and gender.

(b) **Contact Data**, including postal address, email address and telephone numbers.

(c) **Financial Data**, including bank account and payment card details.

(d) **Circumstance Data**, including family, dependents, lifestyle, age and social circumstances, presence of certain qualifying health conditions, whether you own or rent your home from a private or public sector landlord, income (including means tested benefits and tax credits) received and disposable income, in each case if relevant to eligibility under one of our assistance schemes, the government definition of fuel poverty or otherwise relevant to eligibility for a service or assistance we provide.

(e) **Delivered Measures Data**, including postal addresses and details of measures delivered or other services provided at those addresses with the objective of alleviating fuel poverty or otherwise improving the circumstances of the occupants, whether those services or measures are provided by or with financial assistance from us (including funding provided from the Warm Homes Fund).

(f) **Transaction Data**, including details about payments to and from you.

(g) **Technical Data**, including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.

(h) **Profile Data**, including enquiries made by you, your interests, preferences, feedback and survey responses.

(i) **Usage Data**, including information about how you use our services and our Website.

(j) **Marketing & Communications Data**, including your preferences in receiving marketing and other communications from us and any third parties and your communication preferences.

2.3 We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but does not directly or indirectly relate to you as an identifiable person.

2.4 We do not collect any special categories of personal data (this includes information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) other than limited data confirming the presence of a qualifying health condition where relevant to eligibility for a service or assistance we offer or provide. Nor do we collect any information about criminal convictions and offences.

2.5 Where we need to collect personal data by law or under the terms of a contract we have with you or to enable us to establish whether you are eligible for assistance, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or to provide that assistance. In this case, we may have to cancel a product or service. We will notify you if this is the case at the time.

3 How we collect personal data

3.1 We use different methods to collect personal data, including the following.

(a) **Direct interactions**. You may give us Identity Data, Contact Data, Financial Data, Circumstance Data, Profile Data and Marketing & Communications Data by filling in forms, by corresponding with us (by post, telephone, email or otherwise) or when meeting our representatives. This includes personal data you provide when you:

(i) create an account or submit an enquiry on our Website;

(ii) conduct transactions with us;

(iii) subscribe to our service or publications;

(iv) request information to be sent to you;

(v) participate in a survey; or

(vi) provide us with feedback.

(b) **Automated technologies or interactions**. When you interact with our Website we may automatically collect Transaction Data, Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our **Cookie Policy** for further details.

(c) **Third parties or publicly available sources**. We may receive personal data from various third parties and public sources, including:

(i) Identity Data, Contact Data and Delivered Measures Data from local authorities, housing associations, other landlords, and other entities to which have provided financial assistance.

(ii) Identity Data, Contact Data, Financial Data and Transaction Data from providers of technical, payment and delivery services.

(iii) Identity Data and Contact Data from data brokers or aggregators based inside the EU.

(iv) Identity Data and Contact Data from publicly availably sources based inside the EU (such as Companies House and the electoral register).

(v) Usage Data and Technical Data from analytics providers or search information providers based inside the EU.

4 How we use personal data

4.1 We will only use your personal data when the law allows us to.

4.2 We will use your personal data in the following circumstances.

(a) Where we need to perform a contract we are about to enter into or have entered into with you.

(b) Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests.

(c) Where we need to comply with a legal or regulatory obligation.

4.3 We have set out below a description of the ways we use your personal data and which of the legal bases we rely on to do so. Where appropriate we have also identified what our legitimate interests are. Note that we may process your personal data on more than one legal basis depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest (where applicable)
To register you as a new customer or user	• Identity Data • Contact Data	• Necessary for performance of a contract with you, or for taking steps requested by you with a view to entering into a contract
To respond to an enquiry received from you in relation to qualification for assistance	• Identity Data • Contact Data	• Necessary for performance of a contract with you, or for taking steps requested by you with a view to entering into a contract
To identify households that may be eligible for assistance under one of our schemes and/or other assistance that may be provided by or with financial assistance from us, and to make contact with those households in connection with that assistance	• Identity Data • Contact Data	• Necessary for our legitimate interests to identify households that may be eligible for assistance
To establish whether a household is eligible for assistance under one of our schemes or other assistance that may be provided by or with financial assistance from us	• Identity Data • Contact Data • Circumstance Data	• Necessary for our legitimate interests to establish whether a household qualifies for assistance
Verification, reporting and audit purposes in relation to our services or funding we provide or administer	• Identity Data • Contact Data • Circumstance Data • Delivered Measures Data • Transaction Data	• Necessary for our legitimate interests (to ensure that assistance is targeted appropriately)

Sharing of information for verification and analytical purposes with National Grid (as the provider of the Warm Homes Fund), our programme partners and with government departments and regulatory or other public bodies with responsibilities relating to energy or the alleviation of fuel poverty	• Delivered Measures Data	• In relation to sharing of personal data of individuals who have received assistance funded wholly or partly from the Warm Homes Fund, depending on the circumstances we consider consent may be an appropriate basis • Save in circumstances where a data subject has been requested to consent to sharing, to the extent that sharing of personal data is justifiable as necessary for our legitimate interests we will apply that basis (to demonstrate that assistance is targeted appropriately and to support analysis and development of policy relating to energy usage and fuel poverty)
To process and deliver a contract entered into with you, including: • management of payments, fees and charges; and • collection and recovery of money owed to us	• Identity Data • Contact Data • Financial Data • Transaction Data • Marketing & Communications Data	• Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, which may include: • notifying you about changes to our terms or privacy policy; and • asking you to leave a review or take a survey	• Identity Data • Contact Data • Profile Data • Marketing & Communications Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to take part in a prize draw, competition or complete a survey	• Identity Data • Contact Data • Profile Data • Usage Data • Marketing & Communications Data	• Necessary for performance of a contract with you • Necessary for our legitimate interests (to study how individuals use products and services provided by or with financial assistance from us, to support development of those products and services, grow our business and to analyse trends and profiles)
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	• Identity Data • Contact Data • Technical Data	• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	• Identity Data • Contact Data • Profile Data • Usage Data • Marketing & Communications Data • Technical Data	• Necessary for our legitimate interests (to study how individuals use products and a services provided by or with financial assistance from us, to develop those products and services, to grow our business and to inform our marketing strategy)

To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	• Technical Data • Usage Data	• Necessary for our legitimate interests (to define types of individuals likely to be interested in products and services provided by or with financial assistance from us, to keep our website updated and relevant, to develop our business and to inform our marketing strategy and to analyse trends and profiles and to carry out customer satisfaction and quality assessment checks)
To make suggestions and recommendations to you about goods or services that may be of interest to you	• Identity Data • Contact Data • Technical Data • Usage Data • Profile Data	• Necessary for our legitimate interests (to develop our products and services and grow our business and to carry out customer satisfaction and quality assessment checks)

4.4 We do not generally rely on consent as a legal basis for processing personal data other than in relation to sending any third-party direct marketing communications via email or text message. You have the right to withdraw consent to use of your personal data for marketing at any time by contacting us. You can contact us at any time to ask us or third parties to stop sending you marketing messages.

4.5 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4.6 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 Disclosure of your personal data

5.1 We may need to share your personal data with the parties and in the circumstances set out below for the purposes set out in the table in paragraph 4 above, including:

(a) where we are required to share personal data by law;

(b) to relevant third parties, public bodies, industry organisations and regulators in our legitimate interest as reasonably required for the operation of our business;

(c) with government departments and government bodies that have an interest in our activities in accordance with our legitimate interests. Unless required otherwise by law we only share personal data with government departments and government bodies for analytical purposes;

(d) to specific partners in delivery of information and services to you in accordance with our legitimate interests;

(e) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

(f) where we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and

(g) where we, in accordance with our legitimate interests or pursuant to a duty of disclosure, in order to enforce or apply any contract to which we are party, or to protect our rights, property or safety or the rights, property or safety of our customers, or others.

5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We do not transfer your personal data outside the European Economic Area.

6 Data security

6.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including appropriate secure computer storage facilities and paper-based files.

6.2 We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

7 Data retention

7.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

7.2 To determine the appropriate retention period for personal data, we consider:

(a) the quantity, nature, and sensitivity of the personal data;

(b) the potential risk of harm from unauthorised use or disclosure of that personal data;

(c) the purposes for which we process personal data and whether we can achieve those purposes through other means; and

(d) applicable legal requirements.

8 Cookies – what they are and how we use them

8.1 "Cookies" are small bits of electronic information that a website can transfer to your hard drive to help tailor and keep records of your visit to that website. When you visit our Website, cookies are used to allow us to better customise your visit to your individual preferences, helping us provide you with the best possible service on our Website. Most major websites use cookies. You can find out more about the way cookies work on www.allaboutcookies.org

8.2 We use cookies to:

(a) simplify the logon process for registered users;

(b) help ensure the security and authenticity of registered users;

(c) help us recognise you as a unique visitor when you return to our Website and to allow us to tailor content to match your preferred interests; and,

(d) enable traffic monitoring.

8.3 When you visit our Website you will be sent anonymous cookies to enable us to keep track of browsing patterns and to build up a demographic profile.

8.4 Whilst you do not need to allow your browser to accept cookies in order to browse much of our Website or to access many of our services, you must have cookies enabled if you wish to access any areas reserved for registered users.

8.5 Most browsers allow you to turn off the acceptance of cookies from websites. If you wish to disable the use of cookies, please refer to the documentation relating to your specific browser(s). Disabling the use of cookies may restrict the use of some parts of our Website.

8.6 For further information view our **Cookie Policy**.

9 Links

9.1 Our Website contains links to other websites. Please note that we are not responsible for the privacy practices of other websites and we recommend you read the privacy statements immediately on entering other websites. This privacy notice does not apply to any other website.

10 Changes to this notice

10.1 We reserve the right to make changes to this privacy notice without prior notice. We will only use information in accordance with the privacy notice(s) under which the information was collected.

10.2 If you regularly use our Website you should continue to check this privacy notice for updates and amendments. You will be deemed to have accepted the changes if you continue to use our Website after any changes have been posted.

11 Your legal rights

11.1 You have the right to do the following.

(a) **Request access to your personal data** (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

(b) **Request correction of the personal data that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

(c) **Request erasure of your personal data**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note that we may not always be able to comply with your request for erasure for specific legal reasons, which we will notify to you (if applicable) at the time of your request.

(d) **Object to processing of your personal data where we are relying on a legitimate interest** (or the legitimate interest of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

(e) **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in the following circumstances.

(i) You want us to establish the data's accuracy.

(ii) Our use of the data is unlawful but you do not want us to erase it.

(iii) You need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

(iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) **Request the transfer of your personal data to you or to a third party**. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

(g) **Withdraw consent at any time where we are relying on consent to process your personal data**. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not

be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11.2 You will not have to pay a fee to access your personal data or to exercise any of the other rights set out above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in those circumstances.

11.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.4 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11.5 You can contact us with regard to any of your legal rights via our data privacy manager using the contact information set out in paragraph 1 above. You also have the right to make a complaint to the Information Commissioner's Office. If you wish to know more about your rights, you can visit the Information Commissioner's website at www.ico.org.uk

12 Jurisdiction

12.1 This privacy notice is governed by and is to be construed in accordance with the laws of England and Wales.

12.2 The courts of England and Wales will have exclusive jurisdiction in relation to any claim or matter arising under or in connection with this privacy notice.

(Updated October 2024)