

Privacy Policy

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Overview of this privacy policy

Westdale North Limited operates under the trading name "Home Energy Experts" ("we", "us", "our") and manages <u>https://www.homeenergyexperts.uk</u> (the "Site").

This Privacy Policy ("Policy") explains how we process your personal information and outlines your rights regarding that processing. Please review this Policy carefully to understand how your information is handled.

As a data controller, we are committed to processing your personal information responsibly and in accordance with this Policy and the applicable Data Protection Legislation.

In this Policy, "Data Protection Legislation" refers to the Data Protection Act 2018 ("DPA 2018"), the General Data Protection Regulation (Regulation (EU) 2016/679) as implemented into UK law ("UK GDPR"), the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) ("PECR"), and any subsequent updates to these regulations.

For the purposes of Data Protection Legislation, the data controller is Westdale North Limited (registration number: 10398708), located at Doncaster Road, Askern, Doncaster, England, DN6 9JD.

Contact information

If you have any questions or concerns regarding the collection or use of your personal information, or if you have any inquiries about this Policy, please contact us via email at: <u>enquiries@homeenergyexperts.uk</u>

Personal information we collect

The personal information we collect may include, but is not limited to, the following:

- **Contact and profile information**: your full name (including any previous or maiden names), title, marital status, residential address, email address, telephone numbers, and any additional contact details you provide.
- Funding and grant eligibility information: details related to household income, employment status, date of birth, national insurance number, information about past loans, details from energy suppliers (e.g., your current provider), homeownership information from Land Registry, and information about government benefits, including data that may relate to your medical or health status.
- **Payment information**: billing address, payment methods, and details such as bank account information or cardholder details.
- **Special category data**: medical and health information, as well as details regarding benefits that may reveal sensitive data.
- Identification and verification information: documents used to verify your identity, such as government-issued identification (e.g., passports or ID cards).
- **Demographic information**: age and gender.

- **Communication data**: any personal information provided in your correspondence with us, including applications for our services and your preferences regarding marketing communications.
- **Geolocation data**: information such as your IP address ("IP"), used for fraud detection, improving website functionality, and tailoring our services to your location.
- Website usage data: analytics data related to your visit, such as session duration, pages viewed, referrer information, and technical data about your browser and operating system.
- **Cookies, analytics, and third-party technologies**: information gathered using cookies, tracking pixels, and analytics tools to understand how you interact with our website, enhance your experience, and save your preferences.

Reasons for processing your data

We use the personal information we collect to manage our business operations and deliver services effectively.

Specifically, your personal information may be used for the following purposes (this list is not exhaustive and may be updated over time):

- To communicate with you.
- To manage your account and deliver our services, including conducting eligibility checks for private work through our online enquiry form and providing our services to customers.
- To verify eligibility for funding and grants, including flexible eligibility schemes.
- To validate and analyse your personal information.
- To perform necessary credit and background checks.
- To evaluate financial risks associated with any funding decisions that may involve or impact you.
- To prevent and detect fraudulent activity or other criminal behaviour.
- To comply with applicable laws, regulations, and regulatory guidelines.
- To manage and improve our website through activities such as troubleshooting, data analysis, testing, research, and statistical evaluations.
- To optimise our website and present its content in a manner that is most effective for you and your device.
- To uphold our commitment to website security and implement protective measures.

Methods of data collection

Most of the personal information we process is provided directly by you to assess your and your home's suitability for our services. However, we also obtain personal information from other sources, as outlined below. We may collect your personal information from a variety of sources, including but not limited to, authorised third parties or our partners to support the delivery of our services.

- Affiliated financial service providers, to confirm your eligibility before delivering our services.
- Providers of insurance-backed guarantees.

- Energy suppliers.
- Your GP, to verify your suitability for flexible eligibility based on health conditions.
- Third parties conducting surveys.
- The Department of Work and Pensions, for status verification.
- Land Registry e-services, for property ownership details.

Additionally, entities with whom we share your personal information may also share information about you with us.

As is common for many websites, we collect data about your website usage. This may include utilising third-party services, such as Google Analytics, to collect, monitor, and analyse this type of information.

Legal grounds for data processing

In accordance with Data Protection Legislation, we rely on the following legal bases ("Legal Basis") to process personal information. Please note that this list is not exhaustive:

- **Performance of a contract**: We process your personal information when it is necessary to fulfil a contract or provide our services. This includes your contact and profile information, payment details, and any data related to your eligibility for funding, including special category data.
- Legitimate interests: We process your personal information where it is necessary for our legitimate business or non-commercial interests, such as delivering high-quality services to you. This includes data related to website usage, geolocation, cookies, analytics, and third-party technology.
- **Consent**: When you have provided consent for specific processing activities, such as the use of your profile information.
- **Compliance with legal obligations**: We process your personal information to meet legal and regulatory requirements in the markets where we operate. This includes compliance with taxation, regulatory, and legal obligations, as well as fraud prevention. Relevant data includes your contact and profile information and identification/verification data.
- **Performance of a task in the public interest**: We may share your personal information with the Department for Energy Security and Net Zero. The Department requires consumer contact information to conduct research and evaluations on activities supported by public funding, which informs Government policy.

Marketing and communications

We may use your personal information to send you newsletters, marketing updates, or promotional materials about additional services we believe may interest you.

You have the right to opt out of receiving marketing communications from us at any time.

If you no longer wish to receive these communications, you can unsubscribe by:

• Clicking the unsubscribe link or following the instructions provided in any email we send.

Please allow up to 5 working days for the unsubscription process to take effect.

Sharing your information

We may share your personal information for the purposes outlined in this policy with:

- Our business partners, agents, representatives, professional advisers, and other service providers, including but not limited to, providers of insurance-backed guarantees, finance services, and energy services;
- Credit reference agencies;
- The Department for Energy Security and Net Zero;
- The Department of Work and Pensions;
- The Financial Conduct Authority and other regulatory bodies.

International data transfers

We do not typically process your personal information outside the UK. However, if such a transfer becomes necessary, we will take all reasonable steps to ensure your personal information is afforded a comparable level of protection in the destination country. This includes implementing one or more safeguards required under Data Protection Legislation.

For more details about the specific safeguards, we apply when transferring your personal information outside the UK, please contact us using the details provided in Section 2, "Contact information," of this policy.

Data security and retention

Your personal information is securely stored on cloud servers located exclusively within UK data centres.

We retain customer information only for the duration of registered installer status. Typically, we do not retain your data for more than 25 years after installation unless it is required to bring or defend legal proceedings or to fulfil regulatory, taxation, or other legal obligations. The retention period aligns with industry standards for warranty and liability claims, regulatory compliance, and record keeping for legal purposes.

When disposing of your personal information, we make every effort to ensure this is carried out in compliance with applicable Data Protection Legislation.

We are committed to the security of your personal information and implement robust measures to protect your data.

Your data protection rights

Under Data Protection Legislation, you have the following rights, subject to certain exemptions:

- **Right to access**: You can request access to your personal information, known as a "subject access request." This allows you to obtain a copy of the personal data we hold about you and verify that it is being processed lawfully. To make a subject access request, please contact our Data Protection Officer using the details provided in Section 2, "contact information." Please note that we may redact or withhold information where necessary to protect third-party rights or legitimate interests.
- **Right to rectification**: You can request corrections to any inaccurate or incomplete personal information we hold about you. Before implementing changes, we may need to verify the accuracy of the new information you provide.
- **Right to withdraw consent**: If you have previously given consent for the collection, processing, or transfer of your personal information, you have the right to withdraw it at any time. This will not affect the lawfulness of any processing carried out before your consent was withdrawn. To withdraw consent, contact us using the details provided in Section 2, or adjust your preferences through your account settings. Withdrawal of consent for non-marketing purposes may limit our ability to provide certain services.
- Right to erasure: You can request that we delete your personal information under specific conditions. This may apply when there is no longer a valid reason for us to process the data, if the data was processed unlawfully, or if erasure is required by law. In some cases, we may be unable to fulfil your request due to legal or regulatory requirements, which will be explained to you at the time of your request.
- **Right to restrict processing**: You can ask us to limit the processing of your personal information in certain circumstances, such as when you contest the accuracy of the data or object to its processing.
- **Right to object to processing**: You have the right to object to our processing of your personal information where we rely on legitimate interests (or those of a third party) and you believe it impacts your rights and freedoms. In some cases, we may demonstrate compelling legitimate grounds that override your objection. You also have an absolute right to object to the use of your personal information for direct marketing purposes. Please note that if you object to processing essential for delivering our services, we may not be able to fulfil our contract with you.
- **Right to data portability**: You can request that your personal information be provided to you or transferred to a third party in a structured, commonly used, and machine-readable format. This applies to information processed automatically based on your consent or as part of a contract.

You are not required to pay any fee to exercise these rights. We will respond to your request within one calendar month. However, the following may apply:

- **Complex requests**: If your request is particularly complex or if you have made multiple requests, we may extend the response time by up to two additional months. We will notify you of any extension and the reason for the delay within the initial one-month period.
- **Identity verification**: If there are doubts about your identity, we may ask for additional information to verify who you are. The one-month response period will begin once we have received this information.
- Unfounded or excessive requests: If a request is manifestly unfounded, excessive, or repetitive, we reserve the right to refuse it. If we choose not to act on your request, we

will inform you of our decision and your right to lodge a complaint with the relevant supervisory authority.

Use of cookies

Cookies are small files containing data, which may include a unique identifier. These files are sent to your browser by a website and stored on your computer's hard drive. Like many websites, we use cookies to collect information. You can configure your browser to refuse all cookies or notify you when a cookie is being sent. However, please note that declining cookies may limit your ability to use certain features of our Site.

We use essential cookies for website functionality, analytical cookies to improve user experience, and marketing cookies to deliver relevant advertisements.

Filing a complaint with the ICO

If you have any concerns about how your personal information is being processed, you have the right to file a complaint with the ICO. Their contact details are provided below. However, we would appreciate the opportunity to address and resolve your concerns directly before you escalate the matter to the ICO. Please feel free to contact us first using the details provided in Section 2, "Contact information" of this Policy.

The ICO's address is: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Updates to this policy

This Policy is effective as of the version number and date referenced above. We reserve the right to update or change this Policy at any time, and so you should check this Policy periodically to ensure that you remain informed about how we process your personal information.

Any changes to this Policy will be effective immediately after being posted on this Site. If we make any material changes to this Policy, we will notify you either through the email address you have provided to us or by placing a prominent notice on our Site.