
PRIVACY NOTICE

BACKGROUND:

Happy Energy Solutions Ltd. understands that your privacy is important to you and that you care about how your personal data is used. **We** respect and value the privacy of all of **our** customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with **our** obligations and your rights under the law.

1. Information About Us

Happy Energy Solutions Ltd.

Limited Company registered in England under company number 8487950

Registered address:

Lowin House

Tregolls Road

Truro

TR1 2NA

Main trading address

Tintagel House

92 Albert Embankment

SE1 7TY

VAT number: 204759703.

Data Protection Officer: Louise Johnson.

Email address: louise.johnson@happyenergy.co.uk

Telephone number: 01872 574900.

Postal address:

Unit 1

New Road

Perranporth

TR6 0JA

We are regulated by: Trustmark, Gas Safe, Oftec, MCS, NICEIC, ICO, Constructionline, RECC, Waste Carrier

2. What Does This Notice Cover?

This Privacy Information explains how **We** use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018

(collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that **We** use is set out in Part 5, below.

4. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **our** collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact **us** to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data **We** hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate or incomplete. Please contact **us** using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask **us** to delete or otherwise dispose of any of your personal data that **We** hold. Please contact **us** using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **us** using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if **we are** relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to **us** directly, **we are** using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **us** for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Part 6 explains more about how **We** use your personal data, including automated decision-making **and** profiling.

For more information about **our** use of your personal data or exercising your rights as outlined above, please contact **us** using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **We** hold about you changes, please keep **us** informed as long as **We** have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **our** use of your personal data, you have

the right to lodge a complaint with the Information Commissioner's Office. **We** would welcome the opportunity to resolve your concerns **ourselves**, however, so please contact **us** first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. **We** do not collect any data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name, title, date of birth, gender	Collected via phone, website, on-line application form, email, tear off slips.
Contact information including address, email, website, telephone numbers.	Collected via phone, website, on-line application form, email, tear off slips.
Payment information including card details, bank account numbers	Collected via phone – no details are stored, no call recordings are made.
Profile information including income, expenditure, property details, household composition, age, benefits received.	Collected via phone, website, on-line application form, email, tear off slips.
Data from third parties including Department for Work and Pensions	On-line via cloud based website
Special Category Data including cold related illness but only if required to prove eligibility for our grants.	Collected via phone and on-line application form – your consent will be requested before collecting this data

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, **We** must always have a lawful basis for using personal data. The following table describes how **We** may use your personal data, and **our** lawful bases for doing so:

What We Do	What Data We Use	our Lawful Basis
Administering our business.	Identify, Contact, Payment, Profile, Third Party Data and Special Category Data.	Legitimate interest in delivering the contract with you.
Supplying our products and services to you.	Identify, Contact, Payment, Profile, Third Party Data and Special Category Data.	Legitimate interest in delivering the contract with you.
Managing payments for our products and services.	Identify, Contact, Payment,	Legitimate interest in delivering the contract with you. No payment details are held digitally or analogue
Personalising and tailoring our products and services for	Identify, Contact, Payment, Profile, Third Party Data and	Legitimate interest in delivering the contract with

What We Do	What Data We Use	our Lawful Basis
you.	Special Category Data.	you.
Communicating with you.	Identify, Contact.	Legitimate interest in delivering the contract with you.
Supplying you with information by email AND/OR post that you have opted-in-to (you may opt-out at any time by unsubscribing via email or telephone call to alter your marketing preferences)	Identify, Contact, Profile.	Legitimate interest in delivering the contract with you.
Confirming eligibility for our grants.	Identify, Contact, Payment, Profile, Third Party Data and Special Category Data.	Legitimate interest in delivering the contract with you.

With your permission and/or where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on **our** products **AND/OR** services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **our** obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated system for carrying out certain kinds of decision-making **AND/OR** profiling. If at any point you wish to query any action that **We** take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact **us** to find out more using the details in Part 11.

- The following automated decision-making method(s) may be used:
 - Department for Work and Pensions check to verify if in receipt of an eligible benefit.

We will only use your personal data for the purpose(s) for which it was originally collected unless **We** reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If **We** do use your personal data in this way and you wish **us** to explain how the new purpose is compatible with the original, please contact **us** using the details in Part 11.

If **We** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **We** will inform you and explain the legal basis which allows **us** to do so.

In some circumstances, where permitted or required by law, **We** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for

the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name, title, date of birth, gender	7 years or according to the requirements of of our funders
Contact information including address, email, website, telephone numbers.	7 years or according to the requirements of of our funders
Payment information including card details, bank account numbers	7 years or according to the requirements of of our funders
Profile information including income, expenditure, property details, household composition, age, benefits received.	7 years or according to the requirements of of our funders
Data from third parties including Department for Work and Pensions	7 years or according to the requirements of of our funders
Special Category Data including cold related illness but only if required to prove eligibility for our grants.	7 years or according to the requirements of of our funders

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data **OR** store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

AND

We will only store or transfer your personal data **OR** store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards

AND

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner’s Office.](#)]

Please contact **us** using the details below in Part 11 for further information about the particular data protection safeguard(s) used by **us** when transferring your personal data to a third country.

The security of your personal data is essential to us and to protect your data, **We** take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful

destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where **we are** legally required to do so;

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If **We** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **we are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in **our** group. This includes subsidiaries **AND/OR** **our** holding company and its subsidiaries.

We may sometimes contract with the following third parties to supply products **AND/OR** services.

Recipient	Activity Carried Out	Sector	Location
Energy Companies – data processor	Provision of grant funding	Energy	UK
Energy Distribution – data processor	Provision of grant funding	Energy	UK
Local Authorities – data processor	Provision of grant funding	Public	UK
Charitable Organisations – data processor	Provision of grant funding	Energy	UK
Sub-contractors – data processor	Provision of works and warranties	Construction	UK
Suppliers – data processor	Provision of works and warranties	Construction	UK
Eligibility Checking Services	Provision of grant funding	Public / Voluntary	UK

If any of your personal data is shared with a third party, as described above, **We** will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **our** obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, **We** will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If **We** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **we are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data, **We** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **our** progress.

11. **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Louise Johnson:

Email address: louise.johnson@happyenergy.co.uk.

Telephone number: 01872 574900.

Postal Address: Unit 1, New Road, Perranporth, Cornwall, TR6 0DL.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **our** business in a way that affects personal data protection.

Any changes will be made available on our website. This Privacy Notice was last updated on 11th January 2022.