

## HUG2 Privacy Policy

The Midlands Net Zero Hub (**MNZH**) as part of Nottingham City Council is leading on the regional delivery of a project called Home Upgrade Grant Phase 2 (HUG 2).

HUG 2 is a national government scheme funded by the Department for Energy Security and Net Zero (**DESNZ**) which awards grants to Local Authorities for energy efficiency and clean heating upgrades in owner occupied and private rented sector fuel-poor homes off the gas grid. It will provide energy efficiency upgrades and low carbon heating via local authority funding, to households in England that are low income, are off the gas grid or have an Energy Performance Certificate (EPC) between D and G.

The following organisations are separate data controllers who are processing your personal data under this scheme:

- MNZH will use your data for funding compliance and reporting on the Scheme to DESNZ
- Your Local Authority will collect and use your data for funding compliance and reporting on the Scheme to DESNZ
- Customer Journey Support ( Nottingham Energy Partnership ) if used by your local authority will collect your data in order to confirm eligibility for the Scheme, provide customer support and advice about energy efficiency, and if eligible, refer your details into the relevant local authority scheme to enable a survey and installation to take place.

When we process personal information relating to you, we will only do so when it is necessary and where we have a lawful reason to do so. We will use the information provided by you for a number of reasons, depending on the service or reasons for interacting with you. When we process your personal information, we will comply with data protection legislation and enable you to exercise your rights contained within the legislation.

### 1. What personal information will the data controllers process?

- **Your Home addresses** and details about your property if you are applying, or being referred, for installation of a measure
- **Your contact details** – and the homeowners (if different) including if you are offered an installation but ~~who~~ do not accept.
- **Personal data** - your name, income and benefits you receive.
- **Special category data** - data revealing racial or ethnic origin and details concerning your health
- **Eligibility and funding** – details about how and why you were identified by your Local Authority for participation in HUG 2 and details about any financial contributions you have made towards the cost of the installation, including benefit eligibility and details of any additional funding used to support the installations, for example from the owners, landlords or other third parties.
- **Measures installed** – details of the energy efficiency measures or low carbon heating system installed, including type, size and cost.
- **Property heating scores** – pre- and post-installation property SAP or RdSAP assessments with scores.
- **Details of installers** in relation to each installation of a HUG 2 measure, including your contact details and any relevant accreditation or registration information

## Lawful basis for processing

The basis under which we use your personal information for the purposes of administering the Scheme is that this is necessary for the performance of a task carried out in the public interest by the Council or in the exercise of official authority vested in the Council.

**Will my information be shared with other organisations or used for other purposes?**

The data controllers will only share your personal information with other departments within their organisations and with other organisations when it is necessary to provide the services to you, and when we have a lawful reason to do so. The data controllers may also share your information when we are obliged to by law.

In relation to the Scheme, the data controllers will share your personal information with each other and with the following organisations:

- DESNZ
- Customer Journey Support
- Installers or assessors of energy efficiency measures appointed by your Local Authority

The information provided by you may also be used for the purpose of any other function carried out by the Council. This may include sharing your information across the Council, or with external organisations. Information about these functions and the legal basis on which information is used for them can be found at <http://www.nottinghamcity.gov.uk/privacy-statement/>.

The information will only be used for another purpose where it is lawful to do so.

**Do I have to provide the information?**

You are **not** obliged by statute to provide the information that is specified here. However, if you do not provide the information we will not be able to assess you for eligibility or administer the Scheme to your property.

**How long will the Council retain the data for?**

Some of the information that you have provided will be kept for 25 years. This is in order for DESNZ to detect instances of fraud.

The Council publish an Information Asset Register (IAR), this will outline the retention periods for the personal data we process. You can find this IAR on our Website <https://geoserver.nottinghamcity.gov.uk/information-asset-register/>

**Information Rights**

The UK General Data Protection Regulation provides the following rights as prescribed by the legislation:

- A right to request a copy of your information
- A right to request rectification of inaccurate personal data
- A right to request erasure of your data known as 'the right to be forgotten'
- A right to in certain circumstances to request restriction of processing
- A right in certain circumstances to request portability of your data to another provider
- A right to object to processing of data in certain circumstances
- A right regarding automated decision making including profiling
  - the right to withdraw consent at any time
  - and the right to lodge a complaint with the ICO