

Privacy Policy for Harborough Energy (including Harborough Solar One) - Last Updated 24APR18/v1.0

This policy sets out how we process your personal information - online, via email, by post or in person. It explains how we collect, use and share your personal data and highlights your rights regarding it. The policy applies to all websites operated by or on behalf of Harborough Energy Limited ('we' or 'us') and to our internal and partner processes.

Who are we?

We are a not for profit cooperative set up in December 2014 to provide affordable, clean energy to the communities in and around Market Harborough. Our local energy projects are designed to offer attractive investment opportunities, as well as, reasonable returns to the landowners and landlords that we use.

As a social enterprise, we aim to become an exemplar for reducing the use of fossil fuels through locally owned and managed renewable energy. The income we receive is used to pay back the investors in our projects, reduce energy costs of the landowners and landlords and to benefit local communities (our 'beneficiaries') by improving their energy use and facilitating better home insulation. We also support a number of local authorities in our region to provide residents (referral 'beneficiaries') with access to Warm / Healthy Homes funded improvements via approved suppliers.

We are managed primarily by volunteers and therefore may not be directly contactable from time to time. However, you can reach us via our registered office below:

- Harborough Energy Limited (including Harborough Solar One Limited)
- c/o The Stables, 32 Main Street, Ashley, Market Harborough, Leicestershire LE16 8HF

About this Privacy Policy

We respect the privacy and security of each individual who visits any of our websites or interacts with us directly or indirectly. As part of our commitment to our investors, our website users and any beneficiaries, this policy sets out the information that we collect, why we collect it and what we do with it. We are 'controllers' of your 'personal data' for the purposes of data protection legislation.

In this policy, references to 'you' means the person whose personal information we collect, use and process. This includes when you contact us or are referred to us, in connection with the projects we run and the services that we provide or when you interact with us in any other way - including via our website (<https://www.harboroughenergy.co.uk>) which holds the most recent version of this policy.

Our Privacy Policy has been designed to ensure that we are compliant with the General Data Protection Regulation (GDPR May 2018) - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

What types of information do we collect and how?

We only collect personal data when it is needed to deal with a request and with your informed consent - such as if you fill out a form, subscribe to our mailing list or respond to a survey. You may be asked to provide your name, e-mail address, subject and your message. You can, of course, visit our website without providing this detail.

In specific circumstances, such as our Harborough Solar One community share offers, we will ask to collect personal details (online, via email, by post or in person) sufficient to allow you, as a prospective investor, to advise us of your interest and for us to provide you with offer information, form a contract, allocate shares and process investments.

In the case of a Warm / Healthy Homes referral, we will ask you to supply us with sufficient personal information for us to put you in touch with the relevant advisor / installer and to manage the referral processes. As this is subject to eligibility, you will be asked to provide us with some basic health and economic data. Further details of this service can be found at: <https://harboroughenergy.co.uk/projects/new-warm-homes-service-launched/>

In order to operate, we collect and hold mandatory information regarding our Directorships, Committees, Meetings and Annual Returns, much of which is made available publicly on our website or via the relevant controlling body (eg Companies House, Financial Conduct Authority's Mutuals Register).

Like most organisations, we also use 'cookies' to help our website operate efficiently. When you use our website, you are informed what these are, how they are used and why. You will be given the option to indicate if you agree to them being used – including the option to check or change your settings at a future date (see below for more on cookies).

We do not hold or process the personal data of children under the age of 16 years. If you are under the age of 16, you must arrange for your parent or guardian to confirm their consent and provide us personal information on your behalf (eg to invest in one of our projects).

How is your information held and how do we use it?

Your information is held securely and accessed only by individuals working or volunteering for us, by community investment specialists or Warm / Healthy Homes partners, who have been specifically authorised by us (and you) to do so. All of our partners are required to adhere to our Privacy Policy.

Your data is used solely to respond to a specific request, to inform you about our projects (if requested) and your investment (if applicable) or to enable a Warm / Healthy Home referral. You can advise us of your marketing preferences at any time - we do not profile you and will never sell your data.

As a small social enterprise, we do not own, host or operate our own in-house information systems. We use email, file storage, list management and web hosting services from a number of Internet Service Providers (ISPs) such as Microsoft, Gmail, Dropbox, MailChimp, Ideal Marketing and WordPress.

Our contractors and volunteers use their own equipment to access these systems. They are all required to protect your personal information by adhering to our Privacy Policy and our wider Data Protection / Information Security guidance (available via <https://harboroughenergy.co.uk/about/governance/>).

Community share offer information for our projects may be held and processed by our appointed specialists on their own systems, who will display and adhere to their own GDPR compliant Privacy Policy (eg <https://www.ethex.org.uk/>).

We also use Social Media Providers (SMPs) such as Facebook and Twitter to promote our community energy services and share offers but we do not pass on any of your personal data to these or any other social platforms (see below).

Privacy by Design

In order to protect your personal information, Harborough Energy supports the following principals:

- Be proactive to prevent data breaches rather than just react if one occurs
- Place higher value on privacy than on extensive data collection
- Integrate and embed privacy into our information system designs
- Don't view project promotion / fund raising as more important than privacy
- Implement full lifecycle protection for collected data

- Be transparent with individuals in our Privacy Policy and legal agreements
- Place the individual first when it comes to your data

Data Security

We are committed to ensuring that your information is secure – this includes confidentiality, integrity, availability and resilience. In order to prevent unauthorised access or disclosure, we have suitable physical, electronic and managerial procedures, tested at appropriate intervals, to safeguard and secure the information we collect online and otherwise.

We do not transfer your personally identifiable information to outside parties – except as stated above. We may be required to release your information in order to comply with the law, enforce our website policies or to protect our rights, property or safety.

Your information will be kept secure and held only for as long as stated below. However, data transmission over the internet cannot be guaranteed as 100% secure. The internet is a global network and therefore there are cases where your data travels or is stored outside the European Economic Area.

External links

This privacy policy applies only to information collected by us. Our website may contain links to other websites. We are not responsible for the privacy policies or activities of such websites and we advise you to read the privacy policy of any website that collects personal information from you. However, we aim to protect the integrity of our site and welcome any feedback about these sites.

Electronic Communication

When you send emails or other communications to us, we may retain those communications in order to process your enquiries, respond to your requests and improve our services. Any personal information you provide to us will only be used and retained with your informed consent (eg Mailing) or as part of our contracted services with you (eg Member).

How long do we store your information for?

We will keep your information for as long as was originally agreed when it was provided to us - unless you specifically contact us otherwise. It is held securely but only for as long as is required for the stated intended purpose:

- **Enquiry data** will be held until we have been able to deal with your request (but no longer than *3 months*).
- **Mailing List data** will be held on an *ongoing basis* with the option for you to request your removal (at any time and within the footer of each mailing).
- **Referral data** will be held for *12 months* from the date of referral and then deleted (unless there is a subsequent query or complaint that requires resolution). It would be unusual for it to extend beyond that period.
- **Member data** will be held whilst your membership is maintained (normally *20 years* or earlier, if agreed). Member withdrawal data will be reviewed annually (within *3 months* of the close of the organisation's financial year). Member data will be held in archive for a further *6 years* to comply with legal and financial requirements.
- **Directorships/Committee/Meetings/Annual Returns data** will be held *indefinitely*.

Our ISPs and SMPs will each have their own bulk data archiving and disaster recovery policies in order to perform full data recovery in the event of a full disaster, often for at least *seven years*.

The servers housing our web site automatically collect (and archive) logs that may record statistical information such as visitors' IP addresses, type of operating systems, time of visit, web pages requested etc, and identify categories of visitors by items such as domains and browser types.

These usage statistics can be used to improve our website and maintain site security. The information in these logs is never used by us in a personally identifiable way, although they may be able to identify or show the individual ISP or company accessing the site. Your ISP or organisation may make such data available that would allow personal identification, but we do not use this data.

What are your rights?

You have the right to ask us, in writing or by email to our address below, for a copy of all your personal data – this is known as a 'subject access request'. We will check your details match our records and we will then send you a copy of your information (to the address we hold in your personal data), in a suitable format, as soon as is practical but no later than *30 days* after we receive your request.

The GDPR provides you with **eight** specific rights that we must respect when your personal information is collected:

- To be informed – Provide you with transparent information about our data processing
- Of access – Let you have access to details / copy of any data we have processed from you
- Of rectification – Help you make sure we rectify incomplete or inaccurate data
- To erasure – You can request we delete your data (at any time)
- To restrict processing – You can block our processing of your data
- To object – You can object to the processing of your data
- To data portability – You can reuse your data for other services
- In relation to automation – You are protected from automated decision making processes

Do you have any concerns or wish to make a complaint regarding your data?

If you are concerned regarding your personal information that we have collected or have a query about our Privacy Policy, you should make contact with us at **Harborough Energy Limited** via one of the following methods:

Email: **HarboroughEnergy@gmail.com**

Post: **c/o The Stables, 32 Main Street, Ashley, Market Harborough, Leicestershire LE16 8HF**

If you are not satisfied with our response, you can make a complaint to the **UK Information Commissioner** via <https://ico.org.uk/concerns/>

How we use cookies

Cookies and how they benefit you

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone through your browser (if you allow them) when you browse websites. They enable the sites or service provider systems to recognize your browser and then capture and remember certain information. We can use cookies to compile aggregate data about site traffic and site interaction so that we can offer you better site experiences and tools in the future.

Your cookies help us to:

- Make our website work as you'd expect
- Improve the speed / security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you

*We do **not** use cookies to:*

- Collect any personally identifiable information
- Collect any sensitive information
- Pass data to advertising networks
- Pass personally identifiable data to third parties

Granting us permission to use cookies (informed consent)

We take the settings on your browser (being adjusted to accept cookies) and your agreement to use them on our website (by clicking to allow them on first use) to indicate that you agree with their ongoing use by us (and our web providers). You can learn below how to remove cookies and stop using them - however, this may mean that our site will not work as you would expect.

More about Cookies

You can learn more about the cookies we use below:

Necessary Cookies (Website Function)

- **Our own cookies** - We use cookies to make our website work. There is no way to avoid these cookies being set other than to not use our site.
- **Third party functions** - Our site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. Our site includes cookies used by **Google** (https://www.google.co.uk/intl/en_uk/policies/privacy/). Disabling these cookies is likely to break the functions offered by these third parties

Analytical Cookies (Visitor Statistics)

We can use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify if our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This can help us to continuously improve

our website. These so called "analytics" programs can also tell us how you reached our site (e.g. from a search engine) and whether you have been here before - helping us to improve our services.

Social Sharing Cookies

We may include sharing buttons on our site, so you can easily Like or Share our content on:

- **Facebook** (<https://www.facebook.com/privacy/explanation>),
- **Twitter** (<https://twitter.com/en/privacy>) and
- **LinkedIn** (<https://www.linkedin.com/legal/privacy-policy>).

Cookies on these sites are set by each provider (as explained in the links). The privacy implications of this will vary and are dependent on the privacy settings you have chosen on each of these social networks.

Turning Cookies Off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies (Learn how here - <http://www.attacat.co.uk/resources/cookies/how-to-ban>). Doing this may limit the functionality of our website and a large proportion of others, as cookies are a standard part of most websites.

It may be that your concerns around cookies relate to "spyware". Rather than switching off cookies in your browser, you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive (Learn more about managing cookies with antispymware software here - www.attacat.co.uk/resources/cookies/how-to-control-your-online-privacy).

Google provides an 'add on' for most browsers (eg Chrome, Internet Explorer 11, Safari, Firefox and Opera) which allows you to opt out of being tracked by Google Analytics across all websites - <https://tools.google.com/dlpage/gaoptout>

We are also considering implementing simple controls on our website to provide you with more granular control, such as those used by organisations such as Voluntary Action Leicestershire (VAL): <https://www.civicuk.com/cookie-control>