

## **Heat Network Investment Project Application Form Privacy Policy**

This privacy policy sets out how Triple Point Heat Networks Investment Management (“TP Heat Networks”, “we” and/or “us”) collect, use and protect any information that you submit as part of applying for Heat Network Investment Project (“HNIP”) funding using the HNIP application process.

This privacy policy does not form part of any contract.

For the avoidance of doubt, TP Heat Networks Investment Management includes the following organisations who are joint data controllers and will have full access to all data that you submit within your HNIP application form, supplementary information and the HNIP application process for the purposes set out in this privacy policy:

- Department for Business, Energy & Industrial Strategy (BEIS) *located at 1 Victoria Street, London SW1A 0ET*
- Triple Point Investment Management LLP – *company number OC321250 located at 1 King William Street, London, EC4N 7AF*
- AECOM Ltd – *company number 1846493 located at St George's House, 5 St. George's Road, Wimbledon, London, England, SW19 4DR;*
- Amberside Advisors Ltd – *company number 6078852 located at Clubfinance House, 64-66 Queensway, Hemel Hempstead, Hertfordshire, England, HP2 5HA*
- BDO LLP – *company number OC30512 located at 55 Baker Street, London, W1U 7EU*
- Ecuity Consulting LLP – *company number OC373224 located at Radcliffe House, Blenheim Court, Lode Lane, Solihull, West Midlands, B91 2AA*
- Gemserv Ltd – *company number 4419878 located at 8 Fenchurch Place, London EC3M 4AJ*
- Lux Nova Partners LLP – *company number 5510349 located at The Stanley Building, 7 Pancras Square, London, England, N1C 4AG*

We are committed to ensuring that your personal data is protected and will make sure to use it only in accordance with this privacy policy.

We keep this privacy policy under regular review to make sure it is up to date and accurate. We may change it at any time and will inform you if any substantial changes take place.

This policy is effective from 29<sup>th</sup> January 2019.

### **1. Which data do we collect**

The data to be collected will include different types of data that is defined as personal data under the General Data Protection Regulation and Data Protection Act 2018 (together “Data Protection Legislation”). It does not include aggregated data where your identity details have been removed and the data cannot be attributed to you any longer.

We may collect the following personal information from you, either via your application for HNIP funding for your project, through information gathering channels deployed at events and online, or voluntarily provided:

- Your name;
- Company name;
- Job title;
- Contact information, including email addresses, telephone numbers and postal addresses; and
- Your queries and details of questions you have asked.

We will neither collect, nor process any special categories of personal data.

## 2. How do we use your data

We require this information for the following reasons:

- Evaluating projects for HNIP funding;
- Processing HNIP applications;
- Performance management of TP Heat Networks by BEIS;
- Evaluation and development of scheme policies e.g. the application process, assessment process, engaging with third party investors etc.;
- Sending you news and updates;
- Inviting you to events;
- Responding to your questions or queries and assisting with handling them;
- Matching data to any dataset held by BEIS;
- Creating sampling frameworks and contacting for further evaluation and research purposes;
- Evaluating or researching the effectiveness of HNIP as a whole;
- Reporting to BEIS; and
- Carrying out surveys in relation to HNIP funding and application process.

### Legal basis for processing

We will only use your personal information 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 information for a new purpose, we will notify you and we will explain the legal grounds which allows us to do so.

We will only use your personal data when the law allows us to. We need all the categories of information in the list above (see Section 1) primarily to allow us:

- to perform a task carried out in the public interest or in the exercise of the official authority given to us, in particular, when we process your applications and follow up on them;

- to comply with a legal obligation, when, for example, we need to retain your data for a certain time; and
- to pursue our legitimate interests provided your fundamental rights do not override our interests when, for example, we respond to your queries or invite to events; and
- for research purposes and/or for statistical archiving in the public interest.

#### Automated decision making

We will not use your personal data in any automated decision making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

### 3. When will we share your data

We will share your personal information with third-party service providers, where they are contracted by us to provide specific services in order to facilitate delivery of our services for the purposes set out in Section 2.

We will allow the following third parties to process your personal data:

- Back office service providers for data storage services;
- Email management provider for assisting with email queries;
- Research organisations for research, evaluation and statistical archiving purposes – including for the construction of sample frames.

We require our third-party service providers to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not transfer the personal information we collect about you to the service providers located outside the EU and EEA, unless they ensure that your personal information receives an adequate level of protection. We will take steps to ensure your privacy rights are protected and your personal information is treated in a way that is consistent with and which respects Data Protection Legislation, by putting in place appropriate measures, including requiring appropriate security measures.

We may also need to share your personal information with:

- Public authorities (e.g. the police) or to otherwise comply with the law, for example, when we need to publish or disclose the data under the Freedom of Information Act 2000 or Environmental Information Regulations 2004.

### 4. Security



We are committed to ensuring that your information is secure. In order to prevent your personal data being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

## 5. How long do we retain your personal information

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

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 6. Controlling your personal information

It is important that the personal information we hold about you is accurate and current. If you believe that any information we are holding on you is incorrect or incomplete, please write to TP Heat Networks Investment Management, care of Gemserv Ltd, 8 Fenchurch Place, London, EC3M 4AJ or email to [enquiries@tp-heatnetworks.org](mailto:enquiries@tp-heatnetworks.org) as soon as possible.

In accordance to the Data Protection Legislation, under certain circumstances, you have the following rights:

- **Request access to your personal information.** This enables you to find out whether we process any of your personal data and to receive a copy it.
- **Request correction or completion of the personal information that we hold about you.**
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if you wish to opt-out from our mailing list.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**

You will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive or we may refuse to comply with the request.

We may also refuse to comply with your request to access personal data if the information you ask us to provide relates to our business management forecasting or planning and the disclosure of such information would likely affect our business, or where the information consists of records of our intentions in relation to any negotiations with you and such disclosure would be likely to prejudice those negotiations, or the requested information consists of a reference given (or to be given) regarding your prospective or current education, training, employment, appointment to any office or your provision of any service. If we refuse your access to personal data, we will explain the reasons in our response to you.

If you wish to exercise any of your rights, please write to us to TP Heat Networks Investment Management, care of Gemserv Ltd, 8 Fenchurch Place, London, EC3M 4AJ or email to [enquiries@tp-heatnetworks.org](mailto:enquiries@tp-heatnetworks.org).

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator.

The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Phone number: 0303 123 1113 or 01625 545 745  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.