



Last Updated: 2 October 2020

INTRODUCTION

Welcome to the privacy policy for Energy & Environment Alliance Ltd) website.

Privacy Policy dated 1st October 2020

This privacy policy:

- sets out how Energy & Environment Alliance process personal data in connection with its business; and
- shows to our members and users that we have a consistent approach to data privacy across Energy & Environment Alliance website.

Purpose of this privacy policy

This privacy policy aims to give you information on how Energy & Environment Alliance collects and processes your personal data through your use of an Energy & Environment Alliance website. Energy & Environment Alliance website – which may be amended from time to time – is listed below.

About us

Energy & Environment Alliance Ltd is a not for profit organisation:

- Energy & Environment Alliance (“EEA”) limited by guarantee, company number 12454204;

Energy & Environment Alliance has its registered address at c/o Ince Gd Corporate Services Ltd, Aldgate Tower, 2 Leman Street, London, E1 8QN.

Energy & Environment Alliance website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with the Energy & Environment Alliance [Terms of Use Policy](#), Energy & Environment Alliance [Cookies Policy](#), and the relevant terms and conditions of use for Energy & Environment Alliance website you are visiting.

Data Controller

This privacy policy is issued on behalf of Energy & Environment Alliance so when we mention “we”, “us” or “our” in this privacy policy, we are referring to the relevant company responsible for processing your data.

Energy & Environment Alliance website and its respective data controller are as follows:

Controller:

Energy & Environment Alliance

Website:

eea.international

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

CONTACT DETAILS

When contacting us about any Energy & Environment Alliance website, please do so as per the details below:

Postal address:

Data Protection

Energy & Environment Alliance

c/o Ince Gd Corporate Services Ltd

Aldgate Tower

2 Leman Street

London E1 8QN

Email: info@eea.international

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time. To ensure that you are always aware of how we use your personal data, we will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data. We may also make changes to comply with changes in applicable law or regulatory requirements.

We will notify you by e-mail of any significant changes to this Privacy Notice. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal data.

HOW WE COLLECT AND RECEIVE PERSONAL DATA

You may give us your personal data directly. This will be the case when, for example, you contact us with enquiries, complete forms on our Sites, register for our services or subscribe to receive our marketing communications or provide feedback to us.

PERSONAL DATA RECEIVED FROM THIRD PARTIES

From time to time, we will receive personal data about you from third parties. Such third parties may include analytics providers, payment providers, hotel and transport providers and third parties that provide technical services to us so that we can operate our Sites and provide our Services. Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

COOKIES

When you access and use our Sites, we will collect certain technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies which may include web beacons, pixel tags, log files and other technologies. Please see our Cookies Policy to

find out more about the cookies and other similar technologies we use, the purposes for which we use them and how to manage, block or delete them.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [EEA Cookies Policy](#).

WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors.

If you browse our Sites, register as a member on our Sites, contact us with an enquiry through our Sites, submit a complaint through our Sites or use any Services available on our Sites, we will collect and process your personal data in connection with your interaction with us and our Sites.

Members

If you register to receive services from us, we may collect and process your personal data in connection with the supply of goods or services to you.

Personnel that work for our partners and suppliers (including subcontractors).

If you (or your organisation) supply products or services to us or otherwise partner with us, we may collect and process your personal data in connection with our receipt of those products and services and/or partnership. This may include personal data included in any email or telephone communications or recorded on any document relating to an order for the products or services.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions; and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA USE AND FULFILMENT OF SERVICES

What, how and why we collect personal data is described fully in the table at the end of this Policy..

Your access to and use of our Sites, including any secure member's area, is subject at all times to our [Terms of Use](#).

OUR LEGAL BASIS FOR PROCESSING

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the relevant Services, or it is in our legitimate interest or a third party's legitimate

interest to use personal data in such a way to ensure that we provide the relevant Services requested by you and others in a secure and effective way.

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available on request by contacting us.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

We will only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application for employment with us. In this case, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide such consent:

- at the time we collect your personal data following the instructions provided; or
- by informing us using the contact details set out in the “Contact Details” section above.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- requesting access to your personal data.
- requesting the correction of your personal data.
- requesting erasure of your personal data.
- objecting to processing of your personal data.
- requesting restriction on processing your personal data.
- requesting transfer of your personal data.

- the right to withdraw consent previously given.

If you wish to exercise any of the rights set out above, please email info@eea.international.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by info@eea.international.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties means companies, individual or other organisations that the given Data Controller who may need to process your personal data, acting as either a data processor, or joint data controller. The categories are as follows:

- Service providers acting as data processors, and based within the European Economic Area who host some *Energy & Environment Alliance website and provide IT and system administration services*
- Professional advisers acting as processors or joint controllers including (but not limited to) lawyers, bankers, auditors and insurers based within the European Economic Area who provide consultancy, banking, legal, insurance accounting and other services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Market research and customer insight organisations, acting as joint data controllers, who are based within the European Economic Area.

What personal data we collect

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data (ID)** includes your first name, last name, username and e-mail address.
- **Commercial Role Data (CRD)** includes job title, organisation name, organisation address, information relating to which sector your organisation is in.
- **Financial Data (FD)** includes bank account and payment card details should you chose to pay for EEA membership or services “on paper”.
- **Transaction Data (TrD)** means details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data (TD)** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access EEA website, how often and for how long you access Energy & Environment Alliance website.
- **Marketing and Communications Data (MCD)** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect and use aggregated data such as statistical or demographic data for EEA's legitimate business purposes. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact

us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

www.eea.international

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Registering as a new member	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Marketing and Communications Data 	<p>Contract (where the user is an individual and is a contracting party through the website terms of use or a user end licence agreement): to fulfil obligations under the contract including providing access to the website/tool.</p> <p>Legitimate interest (where the user is a representative of a customer-organisation): to allow the customer’s designated users to access the website/tool;</p>
To communicate new features and fixes to the website to the user	<ul style="list-style-type: none"> · Identity Data 	<p>Legitimate interest (where the user is a representative of a customer-organisation): explain to designated users of the customer what the new features and bug fixes are for the website/tool.</p> <p>Contract (where the user is an individual and is a contracting party through the website terms of use or a user end licence agreement): to explain to the customer what the new features and bug fixes are for the website/tool.</p>
To administer, operate and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> · Identity Data · Technical Data 	<p>Legitimate Interest/Contract (where the user is referred to as “you” under the website terms of use): to deliver, optimise, maintain, and protect the website’s integrity for the benefit of each user.</p>
To allow members to purchase products or services and use/consume them	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Financial Data · Transaction Data 	<p>Contract (where the person making the purchase is the customer): to create a purchase history, facilitate transactions made “on paper” and fulfil contractual obligations more generally. Online payments may be made through “Stripe”, the third party payment processing platform.</p> <p>Legitimate Interest (where the person making the purchase is doing so on behalf of an organisation): to create a purchase history, facilitate transactions made “on paper” and to create a record of customer users.</p>

<ul style="list-style-type: none"> Share information with the service providers (eg:BREEAM andBWS) 	<ul style="list-style-type: none"> Commercial Role Data Marketing and Communications Data 	<p>Legitimate interest: EEA operating the given website may wish to pass on the customer (where an individual) or designated user's personal data to partner companies to contact them about their experience of the website/tool and suggest BRREAM/BWS services.</p>
<p>To anonymise and create internal case-studies for statistical and operational purposes</p>	<ul style="list-style-type: none"> Identity Data Commercial Role Data Transaction Data Technical Data 	<p>Legitimate interest: any personal data is anonymised to be used for internal statistical purposes to create statistical reports and case studies.</p>
<p>To facilitate communications between the various parties that use the tool; being a function of the website/tool</p>	<ul style="list-style-type: none"> Identity Data Commercial Role Data 	<p>Contract (where the user is subject to website terms of use or an end user licence): the website/tool is collaborative and requires different parties to upload content and communicate with each other and the company data controller.</p> <p>Legitimate interest (where the user is designated by the customer to use the website/tool): the website/tool is collaborative and requires different parties to upload content and communicate with each other and the company data controller.</p>
<p>To anonymise and create case-studies and for statistical purposes or research and development on behalf of the members</p>	<ul style="list-style-type: none"> Identity Data Commercial Role Data Technical Data 	<p>Legitimate interest: we may process your personal data, anonymise it and use the anonymised data for statistical or research and development purposes.</p>

This website is hosted, developed and maintained by EEA who is data controller. Individuals working for customer organisations can create an account to become users and then access and create further content comprising profiling data at individual property level.