



Energy & Environment Alliance Privacy Policy

Date: 18th September 2022

INTRODUCTION

Welcome to the privacy policy for Energy & Environment Alliance Ltd (**EEA**) on the EEA website.

This Privacy Notice (**Privacy Notice**) sets out how EEA processes your personal data in connection with its mission to achieve faster carbon reduction rates in the hospitality industry, the provision of EEA website at <https://www.eea.international> (**Site**), and the provision of our services, including from the Site (**Services**).

This Privacy Notice applies to EEA's customers, suppliers and other third parties that we interact with during the day-to-day provision of our Services.

Privacy Policy dated 18th September 2022

This privacy policy:

- incorporates the new data protection requirements; and
- shows to applicants, our members and users (collectively referred to in this policy as "Members") that we have a consistent approach to data privacy across EEA's website.

IMPORTANT INFORMATION AND WHO WE ARE

EEA is a not-for-profit organisation and is limited by guarantee, company number 12454204.

EEA has its registered address at c/o Ince GD Corporate Services Ltd, Aldgate Tower, 2 Leman Street, London, E1 8QN.

EEA website is not intended for children, and we do not knowingly collect data relating to children.

We are registered as a Data Controller with the Information Commissioner’s Office who are the supervisory authority for all data protection matters.

It is important that you read this privacy policy together with [EEA’s Terms and Conditions of Membership](#), [EEA Cookies Policy](#), and all other relevant terms and conditions of use for EEA website which you are visiting.

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

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 EEA website, please do so as per the details below, and kindly state the name of the website you wish to mention:

Postal address:

Data Protection
Energy & Environment Alliance
c/o Inc GD Corporate Services Ltd.
Aldgate Tower
2 Leaman Street
London E1 8QN
Email: info@eea.international

THIRD-PARTY LINKS

Our website 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

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 the [EEA Cookies Policy](#).

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

What, how and why we collect personal data is described more fully below.

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.

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 EEA 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.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table below:

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 EEA website services and who also 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.

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.**

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 	<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>

	<ul style="list-style-type: none"> · Transaction Data 	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.
Share information with the service providers (BREEAM)	<ul style="list-style-type: none"> · Commercial Role Data · Marketing and Communications Data 	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 services.
To anonymise and create internal case-studies for statistical and operational purposes	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Transaction Data · Technical Data 	Legitimate interest: any personal data is anonymised to be used for internal statistical purposes to create statistical reports and case studies.
To facilitate communications between the various parties that use the tool; being a function of the website/tool	<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>
To anonymise and create case-studies and for statistical purposes or research and development on behalf of the members	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Technical Data 	Legitimate interest: we may process your personal data, anonymise it and use the anonymised data for statistical or research and development purposes.

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.

INTERNATIONAL TRANSFERS

Some of our external third-party providers and partners are based outside the UK and the European Economic Area (EEA). This means that the data that we collect from you, or that you provide to us, may be processed and stored by us outside of the UK or the European Economic Area.

Whenever we transfer your personal data out of the UK or European Economic Area, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented for example:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or the European Economic Area.

YOUR LEGAL RIGHTS

You have the following rights in relation to the personal data we hold about you, If you would like to exercise any of these rights please contact us using the contact details above:

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 that 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.

You also 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).

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy notice under regular review. This version was last updated on 18th September 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.