

Privacy Policy for Evergreen Energy Limited ('Policy')

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1. Who we are

1.1 Evergreen Energy Limited, a company registered in England and Wales under company number 07588438 and having its registered office at The Edge Business Centre, Clowes Street, Manchester, M3 5NA. ("We", "our" and "us")

1.2 Our mission is to guide everyone to a more sustainable lifestyle through eco-friendly living. This is why we place so much importance of establishing trust with our Customers. We are committed to protecting and respecting your privacy. We will only process or otherwise disclose your personal information as described in this Policy.

1.3 We operate under a number of trading names which reflect the different services and products we have available to assist our customers. These include: **Evergreen Energy; Easy MCS; Easy Greendeal; Easy RSS; and Homely by Evergreen Energy**. When we refer to 'Evergreen Energy' in this Policy we are referring to each of these trading names collectively and individually.

1.4 For the purpose of the UK GDPR and the Data Protection Act 2018, the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and any supplementary, subsequent or secondary legislation and regulations, Evergreen Energy is the data controller for your personal data, as set out in this Policy.

2. How to contact Evergreen Energy about your Personal Data?

2.1 Questions, comments, issues and requests regarding this privacy policy or your data are welcomed and should be addressed to info@evergreenenergy.co.uk

2.2 The Edge Business Centre, Clowes Street, Manchester, M3 5NA.

2.3 Telephone: +44 (0) 161 768 5807

3. Scope of this Privacy Policy and changes

3.1 This Policy aims to give you information on how we collect and process your personal data through your use of our websites (see 3.2), including any data you may provide when purchasing or receiving our services, when registering an account or profile on our websites; downloading our Apps; when your employer or main contractor is an Evergreen Energy Approved Organisation or customer of ours; when using our websites or when you communicate with us; when you sign up to any newsletter or email list; or when you enquire about our services or products. This policy also set out when we may communicate with you in relation to our services, products and business, as well as the data we need to process in order to provide our services and products.

3.2 As with all our policies, we may revise and update this Policy from time to time, and any updates will be placed on homely@evergreenenergy.co.uk, toolkit.evergreenenergyinstaller.co.uk, evergreenenergyinstaller.co.uk, evergreenenergy.co.uk, Easy-MCS.com and Easy-Greendeal.com. Please refer to these websites regularly to check any changes and updates to this Policy.

3.3 These websites and our Apps (including the Homely Mobile App) are collectively and individually referred to throughout this document as “the Website”. The Website is not intended for children and we do not knowingly collect data relating to children.

4. What are your rights?

4.1 Evergreen Energy recognises that your personal data belongs to you and we don’t wish to use it in ways that you don’t want us to.

4.2 You can control whether or not you receive marketing email by using the “opt-out” button at the bottom of the email. We will only send these to consumers and individuals with your consent or if you are an existing customer (see Marketing (8.2) below for more details)

4.3 Please note that you have specific rights under data protection law in relation to the use of your data, including the ability to regulate and/or object to our use of your data.

4.4 You have the right to object to our processing of your data in some circumstance, including where:

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing involves automated decision-making and profiling.

4.5 You can also exercise a variety of rights regarding our use of your data:

- You can ask us for a copy of the information we have about you (usually free of charge)
- You can request an explanation of decisions regarding the processing of your information.
- You can ask us to correct any incorrect data we have about you by emailing info@evergreenenergy.co.uk or through communication with your point of contact at Evergreen Energy. You may also be able to correct any data directly through your profile or account on our Website or App, if you have one.
- You can ask us to delete your data.
- You can ask for your data in a common, machine-readable format.
- You can object to any processing we do on the basis of legitimate interests or to any automated decision-making, for example when your employer or main contractor shares your details with us through their account or becoming an Evergreen Energy Approved Organisation

- object to us processing your personal data for direct marketing purposes even if you have previously given consent. You can do this by emailing info@evergreenenergy.co.uk

Please note we will balance any request to assert the above rights with other legal requirements and permissions in relation to the processing and retention of personal data; for example, the need to protect other individual's personal data, to perform a contract with you, to meet a legal reporting requirement or because we have a compelling legitimate interest which we have determined to outweigh the above rights.

4.6 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. Please contact us at info@evergreenenergy.co.uk if you have any queries.

4.7 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

4.8 Links:

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

5. **Withdrawing your consent**

5.1 Where we are processing your personal data based on your consent, you may change your mind and withdraw your consent at any time. You can withdraw your consent to receive marketing communications by clicking on the opt out/unsubscribe link in an email or by adjusting the push message settings for the mobile application. You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us at info@evergreenenergy.co.uk or advising a representative of Evergreen Energy on the phone.

6. **Personal Data we may collect from you**

6.1 We may collect and process the following personal data about you:

- name;
- address;
- email address;
- telephone number;
- gender;
- business address
- business name
- account number
- job title

(If you work for or are otherwise subcontracted to one of our business customers, the above information is collected in order to provide the service to your employer and to engage them as a registered contractor or Evergreen Energy Approved Organisation, effectively set up a quality management system (Easy MCS / Easy Green Deal) or to set up Installer Toolkit (Calculation Software). This information is also required in order to be compliant with regulation.)

- age range
- information about any device you have used to access our Services or the websites, or download an App (such as your device's make and model, device identifier, operating system, browser, MAC address or IP address);
- information about the pages or sections you have visited on the websites including the pages or sections you visited, the website or mobile application you were referred from, and when you visited or used them;
- information about the Services we provide to you (including for example, what we have provided to you, when and where and, if applicable, how much you paid);
- bank account details, payment card information, and information from credit reference agencies;
- your account login details and profile information when you register an account with us, including your user name and password;

- information you provide to us with when you contact us by phone, email, post, or when you communicate with us via social media;
- information about electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication;
- answers you provide when you respond to competitions, votes and surveys;
- your identity, public profile, follows and likes from a social network such as Facebook (this may include your employment or education information if you include it in your public profile);
- your use of your heating system, information on the performance of your heating system, patterns of heating behaviour and absences from the property, all for the purpose of managing the heating of your house (for Homely by Evergreen Energy)
- other personal data which you may disclose to us when you use our Services at any time.

We also collect, use, retain and share **anonymous or aggregated data 'Aggregated Data'** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate data on how you use our Website to calculate the percentage of users accessing a specific website feature, or to better understand how our products function and heating systems operate more widely. 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 Policy.

Sensitive Data (known as Special Categories of Personal Data and includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We do not usually collect this Sensitive Data about you and will obtain your explicit consent in the event we intend to.

7. Sources of personal data

7.1 We will receive your personal data when you provide them to us yourself.

Direct interactions. You may give us your Profile, Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- purchase and receive our services and/or products;
- create an account for one of our services or Websites;
- purchase and use or install one of our products

- download an App;
- you enquire about or purchase services on behalf of your employer/business;
- enquire about or discuss our services and/or products;
- subscribe to our newsletter or mailing list;
- request marketing to be sent to you;
- respond to a survey or provide feedback.

Automated technologies or interactions. As you interact with our Website and Apps, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details. We may also collect information on your heating system use and performance via our Apps and/or Homely products.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below.

- From your employer or main contractor when they are a registered contractor or Approved Organisation with us;
- From an Approved Organisation or other installer, who has installed, repaired or maintained our products at your home;
- Building surveyors and specialists appointed to assess a property in relation to our services;
- From a family member when they have been appointed or notified to us as a point of contact;
- From a member of our household if they have been given access to your Homely Account;
- From banks, financial institutions and payment processing facilities;
- Credit Check providers, Companies House and any other agreed third party references;
- From our industry regulators and Government bodies;
- Technical Data from analytics providers such as Google based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- From our manufacturers, suppliers and subcontractors where they directly supply goods or services to you, so that we may control, oversee and manage the supply of these to you;
- From Clean Air Ventures or other funding provider, where you have entered an assignment of rights contract in relation to the Domestic RHI Scheme run by Ofgem.

7.2 Where we have engaged a sub-contractor (usually an Installer) to perform some of the services to you, they may collect some personal data whilst performing such services and this will be given to us (see also section 10 below Disclosure of your Information).

8. How we use your Personal Data

8.1 All personal data that we obtain about you will be used in accordance with current data protection law and this Privacy Policy. We will process your personal data as follows:

- As necessary, to **meet our obligations under any contracts we are a party to (or your employer or main contractor is a party to)**, such as a contract to process an order from you for one or more of our Services or products including, where applicable, taking payment and carrying out support services and delivery.
- As necessary, to comply with a **legal obligation**, for the following purposes:
 - Where you exercise your rights under data protection law and make requests.
 - To report to our regulators.
 - To provide and maintain tax and accounting records.
- Based on your **consent**, for the following purposes:
 - To send you marketing communications (also see 8.2 Marketing).
 - To provide you with funding options for Heat Pump installations using the Installer Toolkit software.
 - To refer to third party partners in relation to their goods and services.

Based on **Legitimate Interest**. We may process your personal data for the purposes of our legitimate interests, provided that these uses aren't outweighed by your rights or interests. For any uses we justify on the basis of legitimate interest, you have the right to opt out of such processing. These include the following:

- We may contact you for marketing purposes (see 8.2 Marketing).
- We may review and assess your use of our services in order to better understand our business and services, as well as develop new products.
- To set you up as the key user or administrator for your employer who is an Approved Organisation;
- To contact you in relation the performance or subcontracting of services to you or your employer, if you have a validated profile with an Evergreen Energy Approved Organisation or registered contractor;
- To manage or accounts and tax reporting.

- To manage and support our CRM and business functions, supply chain and subcontractors.
- To operate and maintain our Website and portal, to provide updates and new versions and ensure their performance.
- To operate and maintain our apps and ensure their performance;
- To ensure the operational performance of your home heating system;
- To manage our supply chain when the supplier, logistics provider or other subcontractor directly delivers goods to, or performs services for, you;
- To fulfil our obligations to third party funding providers where you have entered an assignment of rights contract under the Domestic RHI Scheme with Ofgem.

8.2 Marketing

- If you are an individual or consumer we will only market to you if you have provided your consent, have requested information from us or purchased services from us and you have not opted out of receiving that marketing.
- We do contact and market to existing business customers and other organisations which we believe may be interested in our services and, as such, may contact you using your business contact information in order to discuss this with you or your employer. This includes if you have a validated profile on your employer's or main contractors account with us (as an Approved Organisation or registered contractor). We rely on our legitimate business interests to do this.
- Nonetheless, we strive to provide you with choices regarding any marketing communication and you will be able to opt out of any communications. If you opt-out we operate a suppression list to ensure we can manage this process, which means we keep the minimal personal data necessary to ensure we do not contact you again.
- Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of service purchase or other transactions, or when we have another legal basis to process.
- We do not share your data for third party marketing without your consent.

Please see the below table for more details on key examples of the data we process, how long for and who it may be shared with.

Data Shared With	Data Collected	Purpose for Collection	Lawful Basis for Processing	Retention Period
Cloud-based CRM system	Name, Company name, geographic location, email address, job role, Contact No.	<p>To provide accurate Customer Relationship Management records for our Customer base and to ensure we are providing a high level of service to our customers through understanding their requirements.</p> <p>To communicate with you about any issue that you raise with us or which follows from an interaction between us</p>	Contractual fulfilment/ Legitimate Interest	Retain indefinitely whilst the Customer is in contract with Evergreen Energy or 2 years post contract/consent
Aircall VOIP Platform	Telephone number / Business Name / Customer Name	<p>To ensure that all calls are recorded for training and quality purposes. To ensure that we can deal with all Customers enquiries and ensure a high level of service</p> <p>To communicate with you about any issue that you raise with us or which follows from an interaction between us</p>	Legitimate interest	3 years
Analytics tools - Google Analytics, Facebook Pixel	Name / Email Address / Contact number - provided through	In order to be able to contact customers/potential customers who are interested in a product or service provided by Evergreen Energy	Consent	6 months if a marketing mail is left unopened

website
forms or at
trade shows
or any other
means.

Primary
account
number
(PAN),
cardholder
name, service
code,
expiration
date

Back Panel / Sage Pay	Name, physical address, email address, telephone number, bank account details (for automatic renewal of 12	<p>To process purchase / service transactions for products and services with customers, and to ensure any transaction issues can be dealt with.</p> <p>To fulfil purchase requests using payment cards</p> <p>For accounting and taxation purposes</p> <p>Documentation should any contractual legal claim arise</p>	Contractual performance / Statutory Obligation/legitimate interest	<p>Maximum 8 years from the date of the performance of the contract</p> <p>8 years for VAT records from the performance of the contract</p> <p>(Note: Full card information is never held in the system in line with PCI / DSS Compliance)</p>
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monthly subscriptions)

CloudFlare	Technical information, Name / Address / Contact information	To protect our websites and infrastructure from cyber attack or other threats and to report and deal with any illegal acts	Legitimate interest	Duration of use of service
Homely by Evergreen Energy (hosted on AWS)	All types of personal data referred to in 6.1 above or otherwise	As a secure cloud hosting service in which relevant information on customers, product and service information, heating system performance, customer profile and preferences, and other personal data processed by the business is stored in accordance with this Policy.	Legitimate interest/ contract/consent	For the duration of any service, engagement or interaction, and for up to 6 months after, unless we otherwise are required or permitted to retain it longer (for example if managing a complaint or for tax/payment records) in accordance with the purpose the data was collected. Aggregated/anonymous data may be retained as set out in 6.1. above. For further information on retention practices for a specific data category, please contact us .
Funding Calculator / Installer Toolkit	Name, Full Postal Address, Email	To advise on improved funding amounts as the cost of borrowing and materials reduces. To contact the customer to arrange the	Consent / Contractual performance / Legitimate interest	NOT completed funding calculator (didn't click link) - Keep data for as long as re-targeting sequence lasts.

(including sharing with subcontractors)	Address, Contact No	assessment of the property	Opted in to send results but NOT booked an assessment - 18 Months
		Building dimensions and installation feasibility data collected during the assessment will be stored in toolkit and utilised to provide a proposal to the customer	Opted in to send results but NOT booked an assessment - 18 Months
			NOT Opted in to send results and NOT booked an assessment but completed funding calculator - 18 Months
			Assessment Carried out and Data Collected and Stored in the Installer Toolkit - 7 Years

MailChimp	Name / Email Address / Phone Number	We collect your name and email address to send you to information about updates relating to:	Consent/legitimate interest	Whilst the customer, their employer or main contractor is an Approved Organisation or otherwise has a contract in place with Evergreen Energy, Easy MCS/Green Deal or chooses to opt out of newsletters.
		<ul style="list-style-type: none"> (i) Approved Organisation registration and account services; (ii) Contacting you in relation to service provision, our services and products, and account 		Not retained if individual rejects validation email as part of registration process for their employer or main contractor with Evergreen Energy.
				NOT completed funding calculator (didn't click link) - Keep data for as long

	management, if you have provided contact details or a validated profile for an Approved Organisation or registered contractor;	as re-targeting sequence lasts.
(iii)	the Easy MCS and Easy Green Deal regulations. This will come in the form of a newsletter;	Opted in to send results but NOT booked an assessment - 18 Months
(iv)	Other business and customer management communications.	Opted in to send results but NOT booked an assessment - 18 Months
(v)	Marketing and other communications as permitted in accordance with this Policy.	NOT Opted in to send results and NOT booked an assessment but completed funding calculator - 18 Months
	We collect your name, email address in order	Assessment Carried out and Data Collected and Stored in the Installer Toolkit - 7 Years

to maintain contact with you about your enquiry into our B2C Services

Website Contact Forms	Name / Email Address / Contact Number	We collect your name, email and telephone number to provide you with your requested information about our products and services	Consent	2 Years, unless you, your employer or main contractor becomes a customer in which case it may be longer, in line with the above retention periods.
With manufacturers, third party suppliers/installers, Approved Organisations, logistics providers and sub-contractors providing services and supplying products on our behalf. (specifically including Dantom who manufacturer Homely products)	Name and identity data; address, email and contact data; information on products and services purchased. Information on the use and performance of your heating system.	In order to manage the delivery of products to you (as well as returns, replacements, collections and refunds) and ensure contracted services are performed as agreed, products purchased are operating correctly, we may need to process personal data and share it with our supply chain.	Legitimate interest; Contract; Consent	Up to 8 years for VAT records from the performance of the contract. Or two years if on the basis of your consent.

Clean Air Ventures or other third-party loan or funding provider.	Name and identity data; address, email and contact data; information on products and services delivered and performance by you.	Where you have obtained funding covering the initial purchase of a heating system in return for an assignment of rights under the domestic renewable heat incentive scheme administered by Ofgem or any equivalent Government subsidy scheme, both you and us may be contractually obligated to share information relating to maintenance of the system, administration of the account and annual declarations to Ofgem	Legitimate interest/consent	Up to 8 years for VAT records from the performance of the contract
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9. Storage of your Personal Data

9.1 Evergreen Energy is a UK based organisation whose offices are in the UK.

- Our Websites are hosted within the UK or the EEA.
- Our customer relationship management, marketing and accounting systems for all our businesses are UK and EEA based.
- We use a wide range of Cloud Service Providers (CSPs) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise all of the CSPs that we use utilise UK or EEA-located processing facilities.
- Our payment processors and banking arrangements are based in the UK or EEA

9.2 The data that we collect from you may be transferred to, and stored at, a destination outside the UK and European Economic Area (“EEA”). Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government (which is deemed to include the European Union post Brexit).
- Where we use certain service providers, we may use specific contracts approved by the European Commission and the UK Government which give personal data the same protection it has in Europe as well as undertaking appropriate due diligence and risk assessment of that service provider and local laws.

9.3 We may also transfer your data outside of UK and EEA without one of the above safeguards (9.2) on an occasional basis with your consent or to perform a contract with you. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

9.4 Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website. Any transmission is therefore at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10. Disclosure of your Personal Data

10.1 We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 736 of the UK Companies Act 1985.

10.2 We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If our business or substantially all of its assets is acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms](#) and conditions and other agreements.

- To protect the rights, property, or safety of us, our customers, or others.
- If we need to disclose personal data to one of our Approved Organisations or other sub-contractors and suppliers who may be providing the services or products directly to you, however, please note we ensure we have appropriate safeguards in place with these sub-contractors.
- If you work for or otherwise are engaged with one of our Approved Organisations and, as such, we share your personal information with the Approved Organisation for the purpose of allocating, supplying, managing and subcontracting our services (you may object to this processing by us, but please note it may affect your ability to perform your contracts with the Approved Organisation).
- To other third parties with your prior consent.

11. Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

12. Complaints

12.1 Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

12.2 Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>