

# MIDLANDS NET ZERO HUB (‘MNZH’) Privacy Policy

## Introduction

MNZH is committed to protecting the privacy and security of your personal data. This Privacy Policy describes how MNZH collects and processes personal data about you, how we will use and look after it and about your privacy rights in accordance with the UK General Data Protection Regulation (‘UK GDPR’).

MNZH is part of a national government scheme funded by the Department for Energy Security and Net Zero (the “**Department**”) which awards grants to Local Authorities.

This Privacy Policy also describes your rights regarding the personal data that we hold about you including how you can access, correct, and request erasure of your personal data.

We will only process your personal data in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

## Collection of Personal Data

For the purposes of this Privacy Policy, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual.

To carry out our services, we may collect, store, and process the following categories of personal data:

- Identity Data, which includes your name and title.
- Contact Data, which includes your addresses (and owners), telephone numbers, and personal or business email addresses.
- Other details for the purposes of fraud, error and non-compliance relating to dates, value of risk, information regarding the property, relevant installers etc.
- Eligibility and funding, this includes details about how and why you were identified by your Local Authority and details about any other financial contributions.

We will collect the majority of the personal data that we process directly from you. In limited circumstances third parties may provide your personal data to us including but not limited to Trustmark, from Ofgem, from government departments, from other organisations administering central or local government schemes that support energy performance or low-carbon heating measures.

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## Use of Personal Data

We only process your personal data where applicable law permits or requires it, including where the processing is necessary for the performance of our contract for services with you, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent.

We may process your personal data for the following legitimate business purposes and for the purposes of performing the contract for services with you:

- Legal obligation - where we have a specific legal obligation to process the personal data we are collecting.
- Consent - we may also rely on your consent as a legal basis for processing your personal data.
- Public interests - where the processing of your personal data is necessary to serve a wider public interest, including the duty to ensure public money is used responsibly and functions under fuel poverty and climate change legislation.
- Relationship Management – where the processing of your personal data helps develop our in-house Customer Relationship Management (CRM) system to help improve relationship management.
- Communication - to provide you with updates, training notices, information on future schemes, opportunities and invitations to relevant events.

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To provide third parties with statistical anonymised information.

You will not be subject to decisions based on automated data processing without your prior consent.

We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is lawful and 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 at [data.protectionofficer@nottinghamcity.gov.uk](mailto:data.protectionofficer@nottinghamcity.gov.uk)

## Data Sharing

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering our relationship with you, including third-party service providers who provide services to us or on our behalf. Third-party service providers may include, but are not limited to local authorities, data storage or hosting providers. These hosting providers may be located outside of the UK.

Your personal data may be shared with the following (non exhaustive):

- Our contracted providers and delivery partners supporting the administration and delivery of the Scheme.
- DESNZ and DESNZ appointed contracted providers (including the Scheme Delivery Partner, Technical Assistance Facility (TAF), for delivery, administration, audit and evaluation of the Scheme, statistical, research and fraud, error and non-compliance prevention and detection purposes.
- Other Government Departments, including Nottingham City Council (the “Local Authority”) who will collect and use your data for funding compliance and reporting.
- The Customer Journey Support if used by your Local Authority, may also collect your data in order to confirm eligibility, and provide customer support and advice.
- Appointed scheme administrators such as Local authorities (and their delivery partners if necessary) Devolved administrations, their local authorities (and their delivery partners if necessary).
- Other organisations administrating/supporting with the administration of central and local government schemes that support energy performance or low carbon heating measures, such as energy suppliers, Ofgem, TrustMark, Microgeneration Certification Scheme.
- We may share your data if we are required to do so by law, for example by court order to prevent fraud or other crime.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- During emergency situations or where necessary to protect the safety of persons.

- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymise the data where possible.
- For additional purposes with your consent where such consent is required by law

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes. Your data may be shared with DESNZ, and you can review their privacy policy at the following link: <https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero/about/personal-information-charter>

## Marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us.

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us at [data.protectionofficer@nottinghamcity.gov.uk](mailto:data.protectionofficer@nottinghamcity.gov.uk)

If you opt out of receiving marketing communications, you may still receive service-related communications.

We will not rent, sell or share Your personal data with any other company for its own marketing purposes without Your consent except where mentioned in this Privacy Policy.

## Third Party

We may share your personal data with other third parties, including:

- Authority Delivery Partners and Contractors: These are organisations or contractors appointed by us to manage and deliver projects on our behalf.
- Service Providers: These third parties, such as IT suppliers, email management services, cloud hosting providers, database providers, installers or assessors, and disaster recovery specialists, process your personal data based on our instructions.
- Professional Advisors: We may engage third-party legal advisors who will act as independent controllers of your personal data and will follow their own privacy policies.

## Cross-Border Data Transfers

We do not store and process your personal data outside the UK and/or the EEA.

As part of our IT infrastructure, your personal data will be stored in the UK on systems provided by our data processors - Microsoft and Amazon Web Services. This does not mean we actively share

your personal data with these entities; rather, they are technical service providers who host infrastructure supporting our IT systems

## Data Security

We take safety and security very seriously and we are committed to protecting personal data. All information kept by us is encrypted and stored on our secure servers at a destination inside the European Economic Area ('EEA').

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

We use all reasonable endeavours to ensure that appropriate security measures are in place to protect personal data. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for a period of up to twenty five (25) years but no longer than necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider applicable legal requirements, 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 we process your personal data for, and whether we can achieve those purposes through other means. We specify the retention periods for your personal data in our data retention policy.

The Council publish an Information Asset Register (IAR), this will outline the retention periods for the personal data we process. You can find this IAR on our website  
<https://geoserver.nottinghamcity.gov.uk/information-asset-register/>

Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. We will retain and securely destroy your personal data in accordance with our document retention policy and applicable laws and regulations.

## Rights of Access, Correction, Erasure, and Objection

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

By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party, and in certain circumstances you have the right to request the restriction of processing.

If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at [data.protectionofficer@nottinghamcity.gov.uk](mailto:data.protectionofficer@nottinghamcity.gov.uk)

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

## Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this Privacy Policy.

If you have any questions about this Privacy Policy or how we handle your personal data or would like to request access to your personal data, please contact the Data Protection Officer at:

Loxley House,  
Station Street,  
Nottingham  
NG2 4NG  
Email: [data.protectionofficer@nottinghamcity.gov.uk](mailto:data.protectionofficer@nottinghamcity.gov.uk)

If you are unsatisfied with our response to any issues that you raise with the Data Protection Officer, you may have the right to make a complaint with the Information Commissioner's Office. The Information Commissioner can be contacted at:

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

## Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time.

If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose.

We may process your personal data without your knowledge or consent where required by applicable law or regulation.

## **Contact Us**

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact the Data Protection Officer at: [data.protectionofficer@nottinghamcity.gov.uk](mailto:data.protectionofficer@nottinghamcity.gov.uk)

Effective Date: 1<sup>st</sup> April 2025