

## **Privacy Policy – Wave 3 of the Warm Homes Social Housing Fund (WH:SHF)**

This privacy notice explains how Dacorum Borough Council (the Data Controller) will use any personal information we collect about you when you use our services.

It has been written to give you a clear explanation of our data processing practices to safeguard you and your personal information

### **What information do we collect about you?**

- Name, Address, Contact Details
- Unique Property Reference Number (UPRN)
- Category of occupier (e.g. Council Tenant, Leaseholder, Private rented)

### **How will we use the information about you?**

We are using the information provided in this case because we have an obligation under GDPR Article 6(1) (e) Task carried out in the public interest or in the exercise of official authority vested in the Controller.

The public tasks include the delivery, administration, audit, evaluation, prevention and detection of fraud, error and non-compliance of WH:SHF Wave 3.

This data will be used to ensure use of public funds has delivered value for money, and realised intended benefits, including to inform policy making in the fields of energy efficiency, fuel poverty, and health. It will also support DESNZ' functions relating to carbon reductions under the Climate Change Act 2008.

In this case, we are collecting personal information for the following purposes:

We process your personal data for the following purposes:

- to support the delivery and administration of WH:SHF Wave 3
- evaluation of the scheme
- to inform the development of government policy.

This may require linking of your data to other datasets held by DESNZ.

Your data may also be used for statistical and research purposes.

For the prevention and detection of fraud, error and non-compliance the data listed will be processed for activity including but not limited to:

- preventing, detecting and investigating fraud, error and non-compliance
- conducting other activities such as linking data across schemes (to prevent/detect breaches of schemes rules) and assurance audit activity to understand fraud and error exposure and how to reduce it
- controls testing and assurance of oversight and delivery of the scheme to inform improvements
- taking administrative actions in connection with fraud
- debt recovery, prosecution and any other related activities

### **Sharing / Recipients**

We may share the information with other recipients for the purposes of carrying out the functions (listed above)

We may share your information with;

- DESNZ
- appointed delivery and research and evaluation partners for WH:SHF Wave 3
- other government departments and agencies who may share this data across their schemes

- delivery agents and partners
- scheme delivery administrators such as local authorities (including their delivery agents/partners if necessary), Ofgem
- devolved administrators (including their delivery agents/partners if necessary)
- relevant teams within the energy companies that are delivering a scheme on behalf of Ofgem, government or similar
- TrustMark, Microgeneration Certification Scheme (MCS) and other accreditation bodies
- across schemes or DESNZ appointed suppliers where necessary for the detection and prevention of fraud and error, debt recovery, prosecution and any related activities including assurance audit activity to understand fraud and error exposure and how to reduce it

We may share your data if we are required to do so by law, for example by court order or to prevent fraud or other crime.

As part of DESNZ 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.

### **How long do we keep your information.**

Your personal data will be stored securely by DESNZ for a maximum period of 7 years following the close of the Scheme or, if later, the completion of installations funded under the Scheme, for the delivery, administration and evaluation of the scheme.

For the purposes of prevention and detection of fraud, error and non-compliance, some data will be stored and shared for a maximum of 25 years. Individual records may be retained beyond this if they relate to ongoing actions such as prosecutions, appeals or debt recovery.

Your personal data will also be stored in accordance with the Council's retention policy.

### **Security and Location of Data**

We will ensure that all personal information is kept securely on servers hosted in the United Kingdom.

Access to all our user information is restricted. Only employees who need the information to perform a specific job are granted access to personally identifiable information.

The servers on which we store personally identifiable information are kept in a secure environment that is continually monitored and tested.

### **Individuals' Rights and withdrawing consent**

You have a right to request a copy of the personal information that we hold about you. If you would like a copy of some or all of your information, please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) in the first instance or visit <http://www.dacorum.gov.uk/home/open-data/personal-information>

You may have a right to request erasure of Special Category information (where the lawful basis is consent (information has been freely provided by you in support of an application), and the council do not have a legal obligation to process this information.

You have a right to request erasure, rectification or restriction where you have provided the Council information under on the lawful basis of consent (Article 6(1) (a)). You may also withdraw your consent to the

Council processing the information you have provided to us under this lawful basis. Please contact [compliance@dacorum.gov.uk](mailto:compliance@dacorum.gov.uk) in the first instance.

### **Notification of changes**

From time to time, it will be necessary to update this Privacy Policy. This is in order to ensure our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If at any point, we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy in force at the time the information was collected.

### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to make your use of the internet better. For further information on how we use these and how you can control it, please visit <http://www.dacorum.gov.uk/home/cookies-policy>

### **Our Data Protection Policy**

We have a General Data Protection Regulation (GDPR) Policy in place and this can be found [here](#):

### **Data Protection Officer**

Our Data Protection Officer for the purposes of Articles 37 to 39 of the General Data Protection Regulation is the Information Security Manager (Legal Governance). You can contact them by emailing [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) or calling 01442 228538.

### **Policy Version**

This Policy was last updated on 12/5/25