

Privacy Policy

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1. About this Policy

Sustainable Building Services (UK) Limited trades under the trading name "Home Hero" ("we", "us", "our"), and operates <https://www.homehero.co.uk> (the "Site").

This Privacy Policy ("**Policy**") informs you about how your personal information is processed by us and the rights you have in relation to the processing of your personal information. Please read this Policy carefully and ensure that you understand how we process your personal information.

We take our responsibility as a data controller seriously and aim to process the personal information that we collect about you in accordance with this Policy and the applicable Data Protection Legislation.

For the purpose of this Policy, the term "**Data Protection Legislation**" refers to the Data Protection Act 2018 ("**DPA 2018**"), the General Data Protection Regulation (Regulation (EU) 2016/679) as implemented into the UK law ("**UK GDPR**") and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) ("**PECR**") and any successor legislation to the DPA 2018, the UK GDPR or the PECR.

For the purpose of the Data Protection Legislation, the data controller is Sustainable Building Services UK Ltd (registration number: Z01382149) of Unit 2B Maple Court, Maple View, White Moss Business Park, Skelmersdale, Lancashire WN8 9TW.

2. How do you contact us?

If you have any questions or concerns about how we collect or use your personal information or have any questions about this Policy please email us at enquiries@home-hero.co.uk.

3. What personal information do we process?

The personal information collected by us may include the following (please note that the below list is not intended to be exhaustive as we may supplement it from time to time):

- **Contact and Profile Data:** your full name (including maiden name or any other former names), title, marital status, residential address, e-mail address, telephone number and any other phone number you may use to contact us.
- **Information related to your funding and grant eligibility (including flexible eligibility):** household income, employment status, date of birth, national insurance number, information about the loans you have taken out in the past, information from energy suppliers such as your current supplier, homeownership details from Land Registry, and information about government benefits that you may receive, including those based on your medical and health data.
- **Payment data:** billing address, payment method such as bank details, and cardholder details.
- **Special Category Data:** Medical and health data, and information about your receipt of benefits that may infer special category data.

- **Identification/verification data:** Identification documents needed to verify your identity to include government issued or national identity documents (such as passports or IDs).
- **Demographic Data:** Age and gender.
- **Communication Data:** Any personal information that you may supply to us in your communications with us, as well as in applications for our services. Your preferences in receiving marketing.
- **Geolocation Data:** IP address ("IP").
- **Website Usage Data:** Analytics data and information about your visit (such as the session duration, the pages on our Site that you access, the page referrer, and other analytics data), login information, and browser and operating system information.
- **Cookies, Analytics and Third-Party Technologies:** We collect information through the use of cookies, tracking pixels, data analytics tools, to understand how you use our Site to improve your experience with our site and to save your preferences.

4. Our purpose for processing your personal information

We may use the personal information we have collected for the purposes of administering our business and carrying out any related activities for the purpose for providing our services.

In particular, we may use your personal information for the following purposes (please note that the below list is not intended to be non-exhaustive as we may supplement it from time to time):

- To contact you.
- To manage your account and provide our services including, but not limited to carrying out eligibility checks for private work via the online enquiry form and to provide our services to our customers.
- To confirm funding and grant eligibility, including flexible eligibility.
- To verify and analyse your personal information.
- To carry out appropriate credit and background checks.
- To assess the financial risk of any proposed funding decision that may involve you or relate to you in any way.
- For the prevention and detection of crime such as fraud prevention.
- To ensure compliance with applicable laws, regulations and regulatory guidance.
- To administer our Site and for internal operations, such as troubleshooting, data analysis, testing, research, and statistical purposes.
- To enhance our Site and present content in the most effective way for both you and your device.
- As a part of our commitment to maintain a secure website and implement security measures.

5. How we collect your personal information

The majority of the personal information we handle is supplied directly by you for evaluating your and your home's suitability for our services. However, we also receive personal information from other sources as described below. We may collect your personal information from various sources,

including, but not limited to, authorised third parties or our partners to facilitate the provision of our services.

- Our affiliated financial service providers for the purpose of confirming your eligibility before performing our services;
- Insurance backed guarantee providers;
- Energy providers;
- Your GP to confirm your suitability for flexible eligibility based on health conditions;
- Third parties for the purpose of conducting surveys;
- The Department of Works and Pensions for status checks; and
- Land Registry e-services regarding ownership of property.

Please note that any entities that we share your personal information with may also provide us with your personal information.

Like many site operators and as mentioned above, we collect your website usage data. We may do through the use of third-party services such as Google Analytics that collect, monitor, and analyse this category of information.

6. Our legal basis for processing your personal information

Under the Data Protection Legislation, we rely on the following legal grounds (known as "Legal Basis") to process personal information. Please note that the below list is not intended to be exhaustive:

- **Performance of a contract:** When it is necessary for us (or a third party) to process your personal information to provide you with our services. This includes your contact and profile data, payment data and any information regarding your eligibility for funding which may include special category data.
- **Legitimate interests:** We may process your personal information relying on legitimate interest grounds to include our commercial and non-commercial interests in providing a high quality service to you. This includes website usage, geolocation and cookies, analytics and third-party technology information.
- **Consent:** Where we are relying on consent to process your personal information. This includes your profile data.
- **Compliance with legal obligations:** When we must process your personal information to comply with a law or regulation in the markets we operate in, such as to comply with our regulatory, taxation and legal obligations such as to detect and prevent fraud. This includes your contact and profile data and identification/verification data.
- **Performance of a task carried out in the public interest:** When we share your personal information with the Department for Energy Security and Net Zero. The Department requires consumer contact details to carry out research and evaluation on activities undertaken with public funding, with the resulting evidence used to inform Government policy.

7. Communications and marketing

We may use your personal information to send you newsletters, marketing, or other promotional materials informing you about our additional services that we think may be of interest to you.

You have a right to "opt-out" from receiving marketing information from us at any time.

If you no longer wish to receive such information, you can unsubscribe by:

- Clicking the unsubscribe link or instructions provided in any email we send;

Please allow 5 working days for the un-subscription process to be completed.

8. Who do we share your personal information with?

We may share your personal information for the purposes set out in this policy to:

- Our business partners, agents, representatives, professional advisers and other service providers, including, but not limited to, insurance backed guarantee providers, finance providers, and energy providers;
- Credit reference agencies;
- The Department for Energy Security and Net Zero;
- The Department of Work and Pensions; and
- The Financial Conduct Authority and other regulatory authorities.

We are taking part in a project under the Green Homes Finance Accelerator scheme, funded by the UK Department for Energy Security and Net Zero. As such, your personal information may be shared with the department and our consortium partner Scroll Finance.

Scroll Finance's privacy policy can be found [here](#) and the Department for Energy Security and Net Zero [here](#).

9. Do we transfer your personal information to other countries?

We do not intend to process your personal information outside of the UK. However, should this occur we will use reasonable endeavours to ensure that your personal information receives a comparable level of protection when it is transferred to other countries. We aim to achieve this by implementing at least one of the safeguards mandated by Data Protection Legislation.

For detailed information of the specific safeguards we apply when transferring your personal information outside of the UK, please reach out to us using contact details provided in Section 2 "How to contact us" of this policy.

10. Security and retention of your personal information

Your personal information is stored securely via Cloud Servers which are all in UK data centres.

We retain personal information of our customers only for the duration of registered installer status. We do not expect to retain your data for longer than 25 years after the installation, unless it is needed for the purpose of bringing or defending legal proceedings, or otherwise meet our regulatory, taxation or other legal obligations.

When disposing of your personal information, we will use appropriate endeavours to ensure that this is done in accordance with the relevant Data Protection Legislation.

We take security of your personal information seriously and will employ appropriate efforts to ensure the safety of your data.

11. What are your rights?

Under the Data Protection Legislation, you have the following rights that are subject to certain exemptions:

- **Your right to access:** you can request access to your personal information, a process known as a "subject access request". This allows you to obtain a copy of the personal information we hold about you and verify our lawful processing of it. Subject access requests should be directed to our Data Protection Officer, as detailed in Section 2 "*How to contact us*" of this policy. However, we may redact or withdraw data to protect third-party rights or if deemed necessary to safeguard your or our legitimate interests, or those of a third party.
- **Your right to rectification:** You can request correction of any personal information we hold about you. This right allows you to have any incomplete or inaccurate information we hold about you corrected. However, before actioning your request, we may need to verify the accuracy of the new information you have provided to us.
- **Right to withdraw consent:** If you have consented to the collection, processing, and transfer of your personal information for a specific purpose, you can withdraw this consent at any time. Withdrawing consent will not affect the lawfulness of processing we conducted prior to your withdrawal. To revoke your consent, please refer to the contact details in Section 2 "*How to contact us*" this policy.
- **Your right to erasure:** You can request the correction of your personal information that we maintain. This enables you to rectify any data that is incomplete or incorrect, although we may need to validate the accuracy of the new data you provide.
- **Your right to restriction of processing:** You can request the deletion of your personal information under certain conditions. This right allows you to ask us to erase personal information when there is no valid reason for its continued processing. You also have the right to request data deletion if you have successfully objected to processing (see below), if

your data was unlawfully processed, or if erasure is mandated by law. However, we may not always be able to fulfil your erasure request for specific legal reasons, which, if applicable, will be communicated to you at the time of your request.

- **Your right to object to processing:** You can object to the processing of your personal information when we rely on a legitimate interest (or those of a third party) and you disagree with this processing. We may provide compelling legitimate reasons for processing that override your rights. You also have the absolute right to object to your personal information being used for direct marketing. Please note that processing your personal information is essential for us to deliver services under the terms of our contract. If you object to this processing, we may be unable to continue providing our services and products or fulfil the contract we have with you.
- **Your right to data portability:** You can request the transfer of your personal information to yourself or a third party. We will supply your personal information in a structured, commonly used, machine-readable format. This right applies only to information that was processed automatically and for which you initially gave consent or that we used to perform a contract with you.

You are not required to pay any charge for exercising your rights. If you make a request, we have one calendar month to respond to you. However, this may be subject to the following considerations (please note that this list is not exhaustive):

- **Complex requests:** should your request be intricate, or if we have received a number of requests from you, we may extend the response time by an additional two months. In such circumstances, we will notify you of this extension and the reason for the delay within the initial one-month period.
- **Identity verification:** we may ask you for further information to confirm your identity if we have reasonable grounds to be concerned with who you are. The one-month timeframe for our response will commence once we have received this additional information.
- **Manifestly unfounded or excessive request:** we reserve the right to decline requests that are clearly unfounded or excessive, especially if they are repetitive. If we choose not to act on your request, we will inform you of our decision and your right to lodge a complaint with the supervisory authority, all within one month, unless extended as above.

12. Cookies

Cookies are files with a small amount of data, which may include a unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to

indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

13. How to raise a complaint with the ICO

If you have any concerns regarding the processing of your personal information, you have the right to lodge a complaint with the ICO, please see the below contact details. We would always appreciate the opportunity to resolve a complaint before you contact the ICO and so we encourage you to contact us initially before you submit a complaint to the ICO. Our details are in Section 2 "*How do you contact us?*" of this Policy.

The ICO's address is:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

14. Changes to this Policy

This Policy is effective as of the version number and date referenced above. We reserve the right to update or change this Policy at any time, and so you should check this Policy periodically to ensure that you remain informed about how we process your personal information.

Any changes to this Policy will be effective immediately after being posted on this Site and if we make any material changes to this Policy, then we will notify you either through the email address that you have provided to us or by placing a prominent notice on our Site.