

PRO ENVIRO LIMITED

Energy Engineering, Sustainability and Decarbonisation Consultancy

Data Protection (Privacy) Policy

1. Introduction and Scope

Pro Enviro Limited is committed to protecting the privacy and security of personal data. This Data Protection Policy sets out how we collect, use, store, share and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Policy applies to all personal data processed by Pro Enviro, whether held electronically or in paper form, and covers data relating to employees, clients, suppliers, contractors and other individuals whose personal data we process in the course of our business as an Energy Engineering, Sustainability and Decarbonisation Consultancy.

We have appointed a Data Protection Officer (DPO) and have implemented appropriate technical and organisational measures, including appropriate data protection policies, to ensure compliance with UK GDPR and to protect the rights of data subjects.

2. Data Protection Principles

Pro Enviro processes personal data in accordance with the following principles, as required by UK GDPR. Personal data must be:

- processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency);
- collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes (purpose limitation);
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (data minimisation);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay (accuracy);
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed (storage limitation);
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

Pro Enviro is responsible for, and must be able to demonstrate compliance with, these principles (accountability).

3. Lawful Basis for Processing

Pro Enviro will only collect and use personal data where we have a lawful basis for doing so. Our lawful bases for processing are as follows:

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- promoting, marketing and advertising our products and services, including sending promotional communications which are relevant and tailored to individual customers (where consent has been obtained or a legitimate interest applies);
- understanding our customers' behaviour, activities, preferences and needs in order to improve our service;
- improving existing products and services and developing new products and services;
- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour, and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries, complaints or disputes;
- managing insurance claims by customers;
- administering and managing our employees, contractors and other personnel.

6. Data Retention

We will not retain personal data for longer than is necessary for the purposes set out in this Policy. The criteria we use to determine retention periods include:

- the duration of our contractual relationship with you;
- legal or regulatory obligations that require us to retain data for a specified period (for example, HMRC requirements);
- whether there is an ongoing legal claim or investigation in which the data may be relevant;
- guidance issued by relevant supervisory authorities or industry bodies.

As a general rule, we will not retain personal data for longer than 6 years from the end of our relationship with you, unless a longer retention period is required by law or regulation. Where personal data is no longer required, we will ensure it is securely deleted or destroyed.

7. Security of Personal Data and Cyber Essentials Certification

Pro Enviro takes the security of personal data seriously. We have implemented appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Pro Enviro holds Cyber Essentials Certification, the UK Government-backed scheme that demonstrates our commitment to protecting our systems and data from the most common cyber threats. Cyber Essentials requires us to have controls in place across five key technical areas:

- Firewalls: ensuring that only safe and necessary network services can be accessed;
- Secure configuration: ensuring that computers and network devices are configured to minimise vulnerabilities;
- User access control: ensuring that only authorised individuals have access to systems and data, with the principle of least privilege applied;
- Malware protection: ensuring that virus and malware protection is installed and kept up to date;

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particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. Further information, including contact details, is available at <https://ico.org.uk>.

9. Personal Data Breaches

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Pro Enviro has procedures in place to detect, report and investigate suspected personal data breaches. Where we are legally required to do so, we will notify the ICO of a reportable breach within 72 hours of becoming aware of it, and will notify affected data subjects without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

All staff and contractors have a responsibility to report actual or suspected personal data breaches to the DPO immediately upon becoming aware of them.

10. Sharing Personal Data with Third Parties

We may share personal data with third parties in the following circumstances:

- with carefully selected third-party service providers and sub-contractors who provide services on our behalf (such as IT support), where those parties are contractually required to process data only on our instructions and to maintain appropriate security;
- with our professional advisers, insurers and auditors;
- with law enforcement agencies, regulatory bodies or courts where we are required to do so by law or in order to protect our legal rights;
- with a prospective or actual purchaser in the event of a sale or merger of our business.

We do not sell personal data to third parties. We do not transfer personal data outside the UK without ensuring an appropriate safeguard is in place, such as an adequacy decision by the UK Government or the use of UK-approved standard contractual clauses.

11. Data Protection Officer

Pro Enviro has appointed a Data Protection Officer (DPO) to oversee compliance with this Policy and with data protection legislation. If you have any questions about how we use your personal data, or if you wish to exercise any of your rights, please contact our DPO using any of the following methods:

- Telephone: 01788 538150;
- E-mail: info@proenviro.co.uk; or
- Post: Data Protection Officer, Pro Enviro Ltd, 8 Davy Court, Rugby CV23 0UZ.

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) at <https://ico.org.uk> or by calling 0303 123 1113.