

# Privacy Notice for the Heat Network Efficiency Scheme Evaluation



This notice sets out how we will process your personal data, and your rights. It is made under Articles 13 and/or 14 of the UK General Data Protection Regulation (UK GDPR).

## Purpose

### Background

Winning Moves is part of the consortium, led by RSM, contracted by the Department for Energy Security and Net Zero (the Department) to evaluate the Heat Network Efficiency Scheme (HNES) which provides funding to existing heat networks looking to improve their efficiency. This includes the heat network which provides heating to your home. Winning Moves is involved specifically in the collection of data from applicants and customers like yourself, to understand more about how the scheme has affected you. This will feed in the overall evaluation, understanding to what extent the fund has met its objectives.

### Scope

This privacy notice covers the evaluative activities of the Heat Network Efficiency Scheme only. It has been curated by Winning Moves and covers Winning Moves processing activities necessary to carry out the purpose detailed above. For the evaluation, DESNZ is the Data Controller and Winning Moves is the data processor.

## Type of data that will be processed

For this project, we will process the following types of personal data:

- > *Simple data*: this may include your name, email address, telephone number, the heat network you are on.
- > *Behavioural data* including your understanding of heat networks, awareness of the heat network you are on and communications with them, awareness of any works that have been undertaken on the heat network, your experience of heat delivery and any improvements you may have seen or wish to see in the future (including how you measure these).
- > *Financial data* may include the amount your heating costs, both before and after the funded improvements.

In addition to project data that is relevant to UK GDPR, we will also be processing the following data which relates to you but does not come under the scope of UK GDPR. However, we will treat this data with the same diligence and care:

- > *Simple data*: this will include information about your home (such as the type of building, the number of people living here, the age of those living here and heating system/energy use)

## How we get the personal data we process

Your personal information is provided through the following ways:

- > Some simple personal data has been shared with us by the heat network that you are a customer of. Sharing of this data with the evaluation team is part of the HNES contractual agreement between the heat network and the Department.
- > Via your response to the interviews/survey you are invited to take part in. Specifically, this will include the additional simple data and some personal simple data (including your heat network and email address for the prize draw for those completing the online survey), all behavioural data around your opinions of your heat network and the associated heat provision to your home, and all energy usage or cost (financial) data.

## The legal bases for processing your personal data

The legal bases for processing your personal data under Article 6 of the UK GDPR are:

- > (1) (e) Public task - where your contact details have been shared with us by your heat network, this has been done so under the lawful basis of 'public task' and in order to enable DESNZ to evaluate the effectiveness of the Scheme.
- > (1) (a) Consent - For all respondents, prior to your completion of the interview/survey, we explicitly seek your consent to collect and process your personal data. Informed consent is always collected by way of an affirmative action such as selecting 'next' to continue with a survey, a recorded verbal agreement when taking part in an interview, or an agreement in writing indicating that you would like to proceed with the research. You can withdraw your consent to store and process your personal data at any time by emailing [dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com). Once the report has been finalised, the contribution of data to this cannot be withdrawn, however this will be aggregated and anonymised, and it will not be possible to identify any individual from this data.

## How we will use your personal data

Winning Moves will have access to the full, non-anonymised data for analysis purposes. Pseudo-anonymised data will also be accessible for the research lead (RSM) and the Department analysts for the purpose of the evaluation and future data collection purposes.

Data will be aggregated, and the anonymized analysis reported to the Department policy staff and the HNES delivery team (Gemserv and partners Ramboll and Turner and Townsend). Where sample sizes are five or fewer, the results will not be reported to protect the anonymity of respondents.

If you are eligible for an incentive, we may use your personal data to administer this incentive.

Provided you have given consent, for a member of the evaluation team to recontact you about follow-up or linked research.

Provided you have given consent, for quality control purposes, for a member of the evaluation team to recontact you to clarify any of your responses

## Will we share your personal data?

Your personal data will be shared with the following third parties:

- > The Department Analysts will have access to pseudo-anonymised data for the purpose of the evaluation. Any information shared with the Department policy team will be anonymous and aggregated.

- > RSM will also have access to the data as they will be triangulating data for the evaluation.
- > Gemserv, the delivery partner, may receive aggregated, anonymous survey responses.
- > Our sub-processors who may carry out some of the processing on Winning Moves' behalf, and under Winning Moves control. An example of this might include the service provider who hosts our survey platform, IdSurvey.
- > Any third party must also process the personal information as set out in this Privacy Policy and as permitted by the UK's Data Protection Act/laws.

## How we will keep your personal data

Your information will be securely stored in our survey software ID Survey and on Microsoft Office 365. We will protect the confidentiality of your information in accordance with our normal data handling procedures and all legal requirements. We will not use it for any purposes other than those which are set out in this Notice. We are committed to keeping personal data secure and take all reasonable technical and organisational measures to protect personal data from loss, misuse or alteration.

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide research services to our clients, and will anonymise data where possible, securely deleting personal data associated with it at the earliest possible point. For this project, we intend to keep all personal information for 12 months post project, in case follow ups are required, therefore data will be deleted in April 2028. We will then dispose of your information by secure digital deletion; however, this will be anonymised at project completion, which is currently estimated at April 2027.

## Where your personal data will be processed

All of your data will be processed in the UK or EEA.

## Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. At any stage, you have the right to:

- > request information about how your personal data are processed, and to request a copy of that personal data. We may ask for verification of your identity before releasing any information to you.
- > request that any inaccuracies in your personal data are rectified without delay.
- > request that any incomplete personal data are completed, including by means of a supplementary statement.
- > request that your personal data are erased if there is no longer a justification for them to be processed.
- > request that the processing of your personal data is restricted, in certain circumstances (for example, where accuracy is contested).
- > object to the processing of your personal data where it is processed for direct marketing purposes.
- > withdraw consent to the processing of your personal data at any time. **Please contact [dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com) to do so.**
- > object to the processing of your personal data.

To exercise your rights please contact the Data Protection Officer using the contact details below.

## Contact details

The data controller for your personal data is the Department for Energy Security and Net Zero (DESNZ). You can contact the DESNZ Data Protection Officer at:

DESNZ Data Protection Officer, Department for Energy Security and Net Zero, 3-8 Whitehall Place, London, SW1A 2EG.

Email: [dataprotection@energysecurity.gov.uk](mailto:dataprotection@energysecurity.gov.uk)

The data processor is Winning Moves.

If you wish to contact Winning Moves:

Phone

0121 285 3800

Email

[dataprotection@winningmoves.com](mailto:dataprotection@winningmoves.com)

Address

Winning Moves  
102 Colmore Row  
Birmingham  
B3 3AG

## Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

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

Tel: 0303 123 1113

<https://ico.org.uk/make-a-complaint/>

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

## Updates to this notice

If this privacy notice changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it, and under what circumstances we will share it with other parties. The 'last updated' date at the bottom of this page will also change.

If these changes affect how your personal data is processed, we will take reasonable steps to let you know.

Last updated: 9 August 2024