

Privacy Notice for EST Business Energy Scotland Evaluation



Important details about Winning Moves

Established in 1995, Winning Moves Ltd undertakes research and evaluation for government, publicly funded and other organisations. We primarily operate as a Data Processor – however, on occasion, we may operate as Data Controller (either singularly or jointly) depending on the nature of our work.

- Company number | 03069806
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- Phone | 0121 285 3800
- Email | info@winningmoves.com
- Information Commissioner’s Office Registration no | Z6399957

Our commitment to your privacy

Winning Moves Ltd takes your privacy very seriously and we are committed to protecting your personal information and the information you provide whilst conducting research with us. Please read this Privacy Notice carefully and contact us with any questions.

We are committed to meeting relevant laws, codes, registrations and standards

	The UK General Data Protection Regulation (GDPR)		ISO20252:2019 – the International Quality Standard for Market, Opinion and Social Research
	Data Protection Act 2018		Information Commissioner’s Office Registration no Z6399957
	Market Research Society (MRS) Code of Conduct		Cyber Essentials

As a Market Research Society Company Partner, you can trust that your personal information will be treated with respect, and it will only be used for the purposes that we inform you about. It is not our aim to sell or promote anything. We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will

be used. You can verify that we are a bona fide market research consultancy by contacting the Market Research Society (MRS) on freephone 0500 396 999.

Purpose

Background

Business Energy Scotland is funded by the Scottish Government to provide free and impartial support to help small and medium-sized businesses save energy, carbon and money. Launched in April 2022, it is managed by Energy Saving Trust (EST). Winning Moves, part of GC Insight, has been commissioned by Energy Saving Trust to evaluate Business Energy Scotland Advice Service. The purpose of the evaluation is to help Business Energy Scotland understand whether and how the programme is achieving its aims. Specifically, the evaluation will explore the motivations for seeking advice, whether any action has been taken as a result of receiving advice, whether any financial or carbon savings are associated with any action that may have been taken and overall satisfaction with the programme.

Data controller and data processors

For the purposes of this project:

- ***The EST is the data controller and also a data processor***
- ***Winning Moves, part of GC Insight, is a data processor.***

Type of data that will be processed

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

- Simple data including your name, email address, telephone number. Additionally, we will process your organisation name
- Behavioural data including details about the support you have received, recommendations made and your beliefs and opinions associated with the support you have received
- Financial data including financial savings associated with recommendations made through the programme.

How we get the personal data we process

Most of your personal information is provided through the following ways:

- Your contact details have been shared with us by Energy Saving Trust in order to contact you about the evaluation. The EST have a privacy notice and this will have been available when you signed up to Business Energy Scotland. A copy can be found [here](#).
- From you directly during the survey you have been invited to participate in as part of the evaluation.

The legal bases for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- 1) The sharing of your contact data to us from EST is covered by 'legitimate interest'. EST have a legitimate interest in understanding the efficacy of Business Energy Scotland and whether it is achieving its intended aims.

- 2) Any data that we collect from you is covered by 'consent'. Prior to commencing an interview with you, 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 at any time by informing the interviewer or emailing info@winningmoves.com

How we will use your personal data

Your personal data may be used in the following ways:

Your data will be combined with responses from other evaluation contributors. We will use our analysis of this data to produce a report for EST answering their research questions. All findings in this report will be anonymous and aggregated. This means that no one reading the report will be able to identify any individual from their responses.

As part of the evaluation outputs, as well as the report, EST would also like a full dataset of all survey responses. During the interview with you, we will ask if you consent to your personal and identifying data to be included in this dataset, or if you would like it removed and for you to remain anonymous.

To protect your personal data, we will pseudonymise our data sets, and store and transfer personal identifiers securely and separately.

Additionally:

- Your data may be linked to other data sources;
- For quality control purposes: we may telephone you to validate your responses;
- Providing you have given consent; we may keep your data securely on file to use in database processing next year to identify cases of follow up support. This will just be information on the support you accessed, mainly to ensure we do not recontact you about what we have already discussed
- Your data will not be used for automated profiling.

Will we share your personal data?

Your personal data **may** be shared with the Energy Saving Trust where you have provided explicit consent for your survey responses to be shared in conjunction with your identifying data.

Other parties who might access your data includes:

- Our sub-processors who may carry out some of the processing on Winning Moves' behalf, and under Winning Moves control, for example the service provider who hosts our survey platform, IdSurvey.

- We may share your data with a third party purely for the purpose of delivering a function on our behalf. They will have access to personal information to perform the function but will not use it for any other purpose.

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. 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 personal data processed for the evaluation for 6 months after completion of the project – we expect this to be May 2025. We will then dispose your information by secure digital deletion.

Where your personal data will be processed

The majority of your data will be processed within the UK or European Economic Area. However, if you have been sent an email inviting you to participate in the evaluation, your email address and name (in order to address the email correctly) will be processed via MailChimp platform whose servers are based in the USA. Our survey platform has a Data Processing Agreement (DPA) in place with MailChimp which includes the EU approved Standard Contractual Clauses/Model Clauses referred to in the UK GDPR.

Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. You are entitled at any stage to ask that your personal data, or part or all of the record of your survey responses, be destroyed or deleted and we will carry out such a request. This can be requested during the interview itself or afterwards. You have the right to access any personal data that we process relating to you. We may ask for verification of your identity before releasing any information to you.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us:

Phone	Email	Address
0121 285 3800	dataprotection@winningmoves.com	Winning Moves 102 Colmore Row Birmingham B3 3AG

You can also complain to the ICO if you are unhappy with how we have used your data:

Phone	Website	Address
0303 123 1113	https://www.ico.org.uk	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF