

## **1.0 Energy Performance Direct takes USER PRIVACY AND DATA PROTECTION Seriously. We believe:**

- User privacy and data protection are basic human rights
- We have a duty of care to the people we interact with
- We only collect and process data when needed
- We never spam
- We will never sell, rent or otherwise distribute or make public your personal information

## **2.0 THE LAW**

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)
- Australian Privacy Act 1988 (APA)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well.

If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in [section 9.0](#)) for clarification.

## **3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT**

This website collects personal information for the following reasons:

### **3.1 E-newsletter**

If you choose to join our email newsletter, the email address that you give us will be passed to Campaign Monitor who provide our email marketing services. Campaign Monitor is a third party data processor (see [section 6.0](#) below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems. Your email address will remain within the Campaign Monitor database for as long as we continue to use their services for email marketing or until you request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining the Energy Performance Direct email newsletter.

While your email address remains within the Campaign Monitor database, you will receive newsletter-style emails from us.

### **3.2 Site Visitor Tracking**

Like most websites, we use Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides. FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

### **3.3 Contact forms and links**

Should you choose to contact us using the contact form on our Contact us page or an email link, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

## **4.0 HOW WE STORE PERSONAL INFORMATION**

As detailed above, we never store your personal data on our site. Should we implement a blog or other area which would require logging in to our site, the data will be stored in a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website if it becomes appropriate.

## **5.0 ABOUT OUR WEB SERVER**

This website is hosted by [Fasthosts](#) within a UK data centre located in Discovery House, 154 Southgate Street, Gloucester, GL1 2EX, United Kingdom. All traffic (transferral of files) between this website and your browser is encrypted and delivered over [HTTPS](#).

## **6.0 OUR THIRD PARTY DATA PROCESSORS**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in [section 2.0](#). All 3 of these third parties are based in the USA and are [EU-U.S Privacy Shield](#) compliant.

- Google ([Privacy policy](#))
- Campaign Monitor ([Privacy policy](#))

## **7.0 DATA BREACHES**

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## **8.0 DATA CONTROLLER**

The data controller of this website is: Energy Performance Direct Ltd.  
Private limited Company with company number: 08296332

Whose registered office is:  
63 Marlborough Rd,

Exeter,

Ex2 4LN

## **9.0 DATA PROTECTION OFFICER**

Zak Henning  
MD Energy Performance Direct  
Telephone: 01392435052  
Email: [zak@energypowerdirect.co.uk](mailto:zak@energypowerdirect.co.uk)

## **10.0 CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

### **10.1 Change log**

#### **18-Feb-2018**

- Privacy policy instigated