

1.0 Introduction

Elmhurst Energy are committed to safeguarding the privacy of our website visitors, applicants and other service users. This Privacy Policy will explain how we will handle the personal data that is submitted to us through our varied services.

By browsing this website, communicating electronically with us and/or submitting your personal data to this Website, you acknowledge and agree to the terms of this Privacy Policy and to the processing of personal data by Elmhurst Energy as described in this policy.

2.0 How We Use Your Personal Data

Elmhurst Energy have detailed in this section the following key elements to how we will use personal data:

- The categories of personal data that we may process through our levels of interaction.
- The source and categories of personal data that we did not obtain directly from you.
- The purposes of how we may process personal data.
- The legal requirement of processing personal data.

2.1 Usage Data

Elmhurst Energy may process data about your use of our website and services, referred to as 'usage data'.

The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely the monitoring and improving of our website and services. We may use this data for marketing purposes which you have the right to opt-out of at any time.

Elmhurst will retain usage data for a maximum of 7 years.

2.2 Account Data

Elmhurst Energy may process your 'account data' which may include your name and email address.

The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests,



namely the proper administration of our website and business.

2.3 Service Data

Elmhurst Energy may process your personal data that is provided during the use of our services and is referred to as 'service data'.

The service data may include submissions through online and/or paper-based forms and notifications. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.4 Enquiry Data

Elmhurst Energy may process information contained in any enquiry that you submit to us regarding products and/ or services, and this is referred to as 'enquiry data.

The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/ or services to you.

2.5 Transaction Data

Elmhurst Energy may process information relating to transactions, including purchases of goods and services that you enter into with us, and/or through our website, and is referred to as 'transaction data'.

The transaction data may include your contact details, and the transaction details. The transaction data may be processed for supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/ or taking steps, at your request, to enter such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

2.6 Notification Data

Elmhurst Energy may process information that you provide to us for subscribing to our email notifications and/ or newsletters and is referred to as 'notification data'.

The notification data may be processed for the purposes of sending you the relevant notifications and/ or newsletters. The legal basis for this processing is the performance of a contract between you and us and/ or taking steps, at your request, to enter such a contract.



2.7 Correspondence Data

Elmhurst Energy may process information contained in or relating to any communication that you send to us and is referred to as 'correspondence data'.

The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.8 Personal Data

Elmhurst Energy may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

2.9 Cookies

Elmhurst Energy has a cookie policy which can be found on our public website.

3.0 User Rights

3.1 Subject Access Requests

You have the right to know what data Elmhurst holds about you, to ask for any errors with that data to be rectified, or to request processing of the data is restricted. You can make data access requests by emailing or telephoning Elmhurst Energy. We will reply to you within 28 days and may contact you in the interim to authenticate your identity.

3.2 Right to Erasure

You have the right to have your erased under certain circumstances:

- Data collected previously that is no longer relevant (for instance data collected when the Data Subject was a child)
- Data collected unlawfully
- Where the Data Subject has withdrawn permission for their data to be used

Elmhurst Energy will comply with requests to have data erased in the circumstances above, with the exception where we are required to comply with a legal obligation,



e.g. Government legislation relating to Energy Certificates under EPBR and approved Energy Assessor Accreditation schemes.

3.3 The Right to Object

You may object if your details are being used for direct marketing, or other ways in which your data is being processed.

Elmhurst allows members, and others who have expressed interest in our services, to opt out of receiving marketing information, however under government rules some notifications are a mandatory requirement of being a member and cannot be refused. This is reflected in our Terms and Conditions.

3.4 The Right to Ratification

You have the right to have your personal data corrected if it is inaccurate or incomplete. This should be done within one month of the request being made.

3.5 The Right Not to be Subjected to Purely Automated Processes

Elmhurst is not using automated processes without any human intervention to process personal data.

3.6 The Right to Data Portability

You have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit that data to another controller.

4. Third Parties

Elmhurst may share data with third parties for transaction and finance purposes.

No data is shared outside of the UK.

5.0 CONTACT DETAILS

If you have any questions concerning this Privacy Policy you can contact us using one of the following methods:

• Email: enquiries@elmhurstenergy.co.uk

• Writing: 16 St Johns Business Park, Lutterworth, Leicestershire, LE17 4HB

• Telephone: 01455883250



6.0 AMENDMENTS

Elmhurst Energy may make amendments to this Privacy Policy to improve our privacy control measures, and the latest copy of the Privacy Policy will be displayed on the Elmhurst Energy website.





Contact Details

Should you require any further clarification, please contact us at:

- Elmhurst Energy
 16 St Johns Business Park,
 Lutterworth,
 Leicestershire,
 LE17 4HB
- 01455 883 250
- → enquiries@elmhurstenergy.co.uk
- www.elmhurstenergy.co.uk

