

# **Green Deal Central Charge Database (GDCC) Privacy Notice v1.3**

The Green Deal Central Charge Database (“**GDCC**”) is operated by the Retail Energy Code Company Limited (“**RECCo**”, “**we**”, “**us**”) of 130 Old Street, London, England EC1V 9BD in accordance with the Retail Energy Code (“**REC**”).

This privacy notice sets out the basis on which we will process information you provide to us or that we collect for the purposes of carrying out duties and functions on behalf of the parties to the REC in accordance with the provisions set out under that Agreement, and other lawful purposes in accordance with relevant data protection legislation.

Please read the following carefully to understand our views and practices regarding information we collect and process, and how we will treat it. The set of rights you can exercise as an individual under current data protection legislation is stated along with the contact information of relevant parties.

For an explanation of terms used, refer to the definitions section at the end of this Privacy Notice.

## **GDCC Data**

GDCC Data is provided by or on behalf of Authorised GDCC Users in accordance with the provisions of their Access Agreement, the latest version of which is accessible on the RECCo website:- [www.retailenergycode.co.uk](http://www.retailenergycode.co.uk)

The GDCC enables the use of GDCC Data in accordance with the permitted uses set out in the REC, and any Access Agreement between RECCo and a GDCC Authorised Person.

By accessing the GDCC, GDCC Authorised Person agree to comply with all terms of use as set out in the REC and their Access Agreement as published from time to time.

## **Information about GDCC Authorised Persons (“User Information”) we process**

Access to the GDCC is limited to individuals who have been provided with an individual user account, either by us or by the organisation that they are accessing the GDCC on behalf of (“**GDCC Authorised Persons**”, “**you**”).

To ensure only legitimate GDCC Authorised Persons access GDCC via the dedicated website, we will process the following:

For GDCC Authorised Persons who access the GDCC via the dedicated website, we will collect:

- information which you or your organisation provides when your individual user account is created, or when you report a problem with the GDCC or otherwise correspond or communicate with us. This includes your name, address, email address, and telephone number;

In addition, we will store details about the connection made when a GDCC Authorised Person accesses the GDCC as follows:

- technical information, including your Internet Protocol (IP) address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

- information about your visit to and use of the GDCC, including the full Uniform Resource Locators (URL) clickstream to, through and from the service (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## **Purposes of the processing and storage of User Information**

We will process the User Information for one or more of the following purposes:

- to provide you with access to and use of the GDCC;
- for internal operations including data analysis, audit management, testing, research, reporting, statistical and survey purposes and to keep the GDCC safe and secure;
- to improve the GDCC and notify you about changes to the GDCC;
- for our administration of the GDCC; and
- to ensure that content from the GDCC is presented in the most effective manner for you and for your computer.

## **Lawful basis for processing**

We are allowed to process your personal data for the following reasons and on the following legal basis:

- You have given your consent to the processing for one or more specific purposes because the Access Agreement between us and the Authorised GDCC User on whose behalf you access the GDCC specifically permits our processing for the purposes; and
- We are permitted to process your personal data based on our ‘legitimate interests’ i.e. we have good, sensible, practical reasons for processing your personal data which is in the interest of RECCo. In this case, our legitimate interests is our implementation and management of the Retail Energy Code. We have considered the impact on your interests and rights and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to any of the processing that we carry out on the grounds of legitimate interests (see the section “[Your Rights](#)” below)

## **Storage of data**

Any personal data we hold relating to a GDCC Authorised Person will be stored only for the duration required by applicable law. Once you cease to require access to the GDCC, we will delete your personal data, but we may keep anonymised information for analytical and performance reasons.

## **International transfers of personal data**

GDCC, and all GDCC Data and User Information it holds, is kept within the United Kingdom and/or European Economic Area and any User Information that constitute personal data is protected by appropriate technical measures. We shall not permit the transfer of information or data held within GDCC to any location outside the UK or the European Economic Area.

## **How RECCo will protect your data**

We treat any personal data about you and any technical information about the connection between the device used by the GDCC Authorised Person and the GDCC dedicated website with the utmost care to prevent loss, misuse or unauthorised access. To ensure the safeguard of the data, we take a variety of appropriate technical and organisational measures. For example, we implement access controls, use firewalls and secure servers, and encrypt personal data.

## **Disclosure of Information**

We will make GDCC Data available to Authorised GDCC Users in accordance with that person's Access Agreement, but we will not otherwise share GDCC Data or User Information with any third party except:

- where we are under a legal, regulatory or professional obligation to disclose this information, or to protect our contractual or other rights, property, or safety or those of others;
- where we, or substantially all our assets, are merged or acquired by a third party, in which case this information may form part of the transferred or merged assets; or
- where we are using a third-party service provider to provide services that involve data processing.

## **Website usage information**

### Use of Cookies in connection with the Website

Cookies are small files saved to your computer's hard drive that track, save and store information about your interactions and usage of our website. We use cookies to distinguish you from other users of the Website and this helps us to provide you with a good experience, presenting content, options or functions to your preferences when you browse the Website. They also allow us to monitor how many people use the website and what pages they tend to visit, which ones they find useful and which they do not so we can improve the use of the Website.

A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note some parts of this website may become inaccessible or not function properly. We also give you the option of disabling all cookies other than those which are categorised as "Necessary" for the functioning of the website. If you would like more information about this practice, including how to prevent it, please visit [www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or [optout.networkadvertising.org](http://optout.networkadvertising.org).

Below is a list of the cookies utilised within our website and what each is used for:

COOKIE	DESCRIPTION	EXPIRY
SessionId	Concurrent Login Prevention	When browsing session ends
X-LB-XXXXXXX	C&C Load Balancer Sticky Session	When browsing session ends
.ASPXFORMSAUTH	Forms authentication cookie, and stores users selected font size	When browsing session ends

## **Links to Third Party Websites**

GDCC may contain links to third party websites. If you follow a link to any third-party website, please be aware that these websites have their own privacy policy and that we do not accept any responsibility or liability for their policies. Please check these policies before you submit any personal data to these websites.

## **Your Rights**

As a data subject you have the following rights under the Data Protection Laws:

- Right to object to processing of your personal data;
- Right of access to personal data relating to you;
- Right to correct any mistakes in your information;
- Rights in relation to automated decision making (note this does not apply);
- Right to prevent your personal data being processed;
- Right to have your personal data ported to another controller; and
- Right to erasure.

These rights are explained in more detail below. If you want to exercise any of your rights, please contact us using the contact details set out in the "Contact us" section. You are not required to pay any charge for exercising your rights.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Act.

### **Right to object to processing of your personal data**

- You may object to us processing your personal data where we rely on a legitimate interest as our legal grounds for processing.

### **Right to access personal data relating to you**

- You may ask to see what personal data we hold about you and be provided with:
  - o a copy of the personal data;
  - o details of the purpose for which the personal data is being or is to be processed;
  - o details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
  - o the period for which the personal data is held (or the criteria we use to determine how long it is held);
  - o any information available about the source of that data; and
  - o whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us with as much information as possible about the type of information you would like to see.

### **Right to correct any mistakes in your information**

- You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

### **Right to restrict processing of personal data**

- You may request that we stop processing your personal data temporarily if:
  - o you do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
  - o the processing is unlawful but you do not want us to erase your data;
  - o we no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
  - o you have objected to processing because you believe that your interests should override our legitimate interests.

### **Right to data portability**

- You may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

### **Right to erasure**

- You can ask us to erase your personal data where:
  - o you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
  - o if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;
  - o you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
  - o your data has been processed unlawfully or has not been erased when it should have been.

## **Changes to Our Policy**

We keep this policy under regular review and it may be amended by us at any time. Any updated version of this policy will be published on the RECCo website at [www.gdccportal.com](http://www.gdccportal.com) and distributed to GDCC Authorised Persons. Please check this page periodically to inform yourself of any changes.

This policy was last reviewed on 17 May 2022.

## **Contact us**

By activating a user account for the GDCC, or by providing any personal information to us offline (for example, where you write to us) you are accepting and consenting to the practices described in this policy.

If you have any questions, need further information about our privacy notice or practices, would like to let us know that your details require updating, or would like to request one of your available rights please contact us at [enquiries@recmanager.co.uk](mailto:enquiries@recmanager.co.uk)

## **Contact the Information Commissioner's Office ("ICO")**

In case you are dissatisfied with the service provided by our help desk team with regards to the fulfilment of your rights and would like to lodge a complaint, you can contact the ICO via:

- email: [caserwork@ico.org.uk](mailto:caserwork@ico.org.uk);
- telephone number: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number;
- postal address:  
Customer Contact, Information Commissioner's Office  
Wycliffe House  
Water Lane,  
Wilmslow SK9 5AF
- website: [www.ico.org.uk](http://www.ico.org.uk)

## **Definitions used in this policy**

<b>Access Agreement</b>	means an agreement between RECCo and any person that sets out conditions, rights and obligations in relation that persons access to GDCC.
<b>Authorised GDCC User</b>	means an organisation who is authorised to access GDCC data in accordance with the REC.
<b>Data Protection Act</b>	means the Data Protection Act 1998, and any statutory instrument that has effect under that Act, all as amended from time to time.
<b>GDCC</b>	means a database that facilitates the process of managing information related to the collection and remittance of Green Deal charges between Green Deal Licensees (i.e. Electricity Suppliers) and Green Deal Providers.
<b>GDCC Authorised Persons</b>	means those individuals granted access to GDCC by or on behalf of Authorised GDCC Users, and for whom the Authorised GDCC User has compliance responsibility.
<b>European Economic Area</b>	provides for the free movement of persons, goods, services and capital between its Member States.
<b>General Data Protection Regulation or GDPR</b>	means the General Data Protection Regulation (EU) 2016/79 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data as transposed into law in the United Kingdom law as the Data Protection Act 1998.
<b>Internet Protocol</b>	means the set of rules governing the format of data sent over the Internet.
<b>Personal data</b>	means data which relates to a living individual who can be identified from that data, or from that data and other information which is in the possession of, or is likely to come into the possession of RECCo.
<b>Retail Energy Code or REC</b>	means the Retail Energy Code designated under the gas and electricity supply licences granted by Ofgem
<b>Uniform Resource Locators</b>	means the standardised naming convention for addressing documents accessible over the Internet.
<b>User Information</b>	means information about any GDCC Authorised Persons.