

Burnside Community Energy: Privacy Policy

(as part of the General Data Protection Regulations)

This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The BCE Privacy Policy may change so please remember to check back from time to time. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

This Privacy Policy covers the following:

1. Who we are
2. How we collect information about you
3. Information we collect and why we use it
4. Legal basis for using your information
5. Marketing
6. Sharing your information
7. Keeping your information safe
8. How long we hold your information for
9. Your rights
10. Cookies

1. Who we are

Here at BCE (Burnside Community Energy), we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

2. How we collect information about you

We want to make sure you receive the communications that are most relevant to you, be it through visiting our website, receiving our newsletter, receiving emails about your investment in BCE, any events that we are holding or receiving general information emails about BCE activities.

We collect information from you in the following ways:

When you invest in BCE: When you become a Member of BCE through investing in the company, we keep a record of your name, address, contact details, the sum of your investment and also your BACS details for the transfer of interest payments.

When you attend BCE Events: These may include the AGM, EGM or any other event where we are asking for your feedback. In these instances we may gather information on your preferences for how community benefit funds are spent, your views on how BCE is managed and what the next steps for the company should be, for example.

3. Information we collect and why we use it

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and bank details (for the purposes of investments and making interest payments to you), as well as information you provide in any communications between us. You will have given us this information when you first invested in BCE and became a Member.

We will only use this information:

- To process your investments and to make interest payments to you.
- To update you with important administrative or financial messages about your investment.
- To keep you informed of formal events like the AGM.
- To invite you to other events that BCE is holding or with which BCE is associated within the Parish.
- To inform you of opportunities to get engaged with BCE's community benefit fund.
- To keep a record of your investment with us.
- Where you volunteer with us, to administer a volunteering arrangement.

4. Legal basis for using your information

In some cases, we may use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for BCE to process your information to provide you with a service.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

5. Making Contact with You

We will only contact you by email about BCE's work and how you can support BCE. For investment purposes or where we need your signature, we may also write to you.

6. Sharing your Information

The personal information we collect about you will only be used by our BCE Administrator. It will only be shared with Directors of BCE so that they can support and inform you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority – such as HMRC).

7. Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

Any BACS and debit or credit card details which we receive are kept securely and only used to process payments through our bank - Unity Trust Bank.

8. How long we hold your information for

We only keep your information as long as you remain a Member and for 3 years thereafter (for the purposes of responding to HMRC, or any other legal authority, if requested by them).

9. Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our office at Burneside Community Energy, Eden Rural Foyer, Old London Road, Penrith and by phone on 01768 210276. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

10. Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

BCE does NOT operate a 'cookie' system on its website.

End.