

PRIVACY NOTICE

1. INTRODUCTION

- 1.1 We take privacy and the protection of personal information seriously. This Privacy Notice sets out details about how we gather, use and share personal information and about individual privacy rights. How we use personal information depends upon the context in which it is made available to us. For further information on how Scarf is impacted by GDPR please read our statement.
- 1.2 Our Data Protection Officer (DPO) provides help and guidance to make sure we apply good practice standards to protecting personal information. Our DPO can be reached by email at lisa.moir@scarf.org.uk if you have any questions about how we use personal information.
- 1.3 This Privacy Notice provides up to date information about how we use personal information and will update any previous information we have published about using personal information. We may make minor updates to this Privacy Notice from time to time, however if we make any material changes to the manner in which we process and use your personal information, we will announce this clearly on our website.

2. ABOUT US

- 2.1 We are what is known as a "processor" and a "controller" of the personal information which we gather and use. When we say "we" or "us" in this Privacy Notice, we mean Scarf Group. We are registered with the UK's Information Commissioner's Office, or ICO, under registration number Z7765191.

3. WHAT KINDS OF PERSONAL INFORMATION WE USE

- 3.1 We use a variety of personal information depending on the circumstances under which personal information is made available to us.
- 3.2 We may use personal information in the following circumstances:
 - (a) **Business Contacts:** We hold the names, job titles and professional contact details for various business contacts, including client contacts and supplier contacts.
 - (b) **Clients:**
 - **Contract Managed Energy Advice Services:** We may collect and use personal information of individuals that work for our clients. This can include names, contact details and information about an individual's work or role at our client; and
 - **Training and Personal Development Services:** If you have received training or have participated in one of the personal development services through Scarf Enterprises Ltd such as City and Guilds Energy Efficiency or STEPS/PX2 courses, we will process your name, job title, employer details and professional contact details (where applicable) and information about your performance on the training course. We may also collect and use some special categories of personal data such as dietary information or disabilities in relation to access;
 - **Energy Advice Service Users:** If you complete a contact details card at one of our Energy Advice events or contact us for advice on Energy efficiency for you or

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a family member or friend we will process your name and contact details and details about your financial circumstances and home environment;

- (c) **Consultants:** If you are a consultant, we will process your name, professional and personal contact details, CV and professional background, payment details and information about the work you complete for us. We may also collect and use some special categories of personal data such as dietary information or disabilities in relation to access; and
- (d) **Job Applicants:** Where you apply for a role with us, we will process the personal information you provide to us as part of your application and any interview selection process. This will ordinarily include your name, personal contact details, professional history, education and qualifications and references. We may also collect and use some special categories of personal data about job applicants, such as information about an applicant's racial or ethnic origin and some health information regarding any medical conditions or disabilities.

4. HOW WE GATHER YOUR PERSONAL INFORMATION

4.1 We only use personal information which we have obtained directly for the purposes described in this Privacy Notice.

4.2 Personal Information is gathered in the following ways:

- (a) **Business Contacts:** These may be collected via forms on our website, or in the course of business-as-usual correspondence with business contacts;
- (b) **Clients:**
 - **Contract Managed Energy Advice Services:** We may collect personal information held by our clients in the course of providing energy awareness advice. Personal information may be included in documentation we are required to assess as part of any service provision, and will ordinarily be provided or made available to us by our client; and
 - **Training and Personal Development Services:** Personal information will be gathered directly from the individual that has signed up to attend one of our training courses;
 - **Energy Advice Service Users:** Personal information will be obtained direct from the service user;
- (c) **Consultants and Job Applicants:** Personal information will be gathered directly from you or from your third party references.

5. WHY WE USE PERSONAL INFORMATION

5.1 We will use personal information for the following purposes:

- (a) **Business Contacts:** We process the personal information of our business contacts as necessary for the legitimate interests of managing the day-to-day operation of our organisation, including correspondence, engaging suppliers, and promoting our services to business contacts;

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(b) Clients:

- **Contract Managed Energy Advice Services:** We process the personal information of individuals that work for our clients in the course of managing the contract in accordance with legal and regulatory obligations which govern how accredited management system certification services are to be conducted.
- **Training and Personal Development Services:** We require to process personal information in order to perform the contract which we have entered into with the individual who has signed up to one of our training or personal development services. Where our contract for services is entered into with a corporate entity for the provision of training to their employees, our processing of personal information is in the legitimate interests of such corporate entity to improve and/or add to the qualifications and skills of their employees; and

(c) **Consultants:** We process the personal information of Consultants for the legitimate interests of determining whether or not to employ a particular individual for a role in our organisation. Where we engage a Consultant, we process their personal information for the purposes of entering into and performing our contract with the Consultant; and

(d) **Job Applicants:** We process the personal information of job applicants for the legitimate interests of determining whether or not to employ a particular individual for a role in our organisation. Where we decide to employ a job applicant, we process their personal information for the purposes of entering into and performing our employment contract with the applicant. We process racial and ethnic origin and health information of job applicants for the purposes of meeting our legal obligations under employment and similar laws.

5.2 If we are not provided with access to personal information for the purposes outlined in this paragraph 5, we may not be able to offer or provide certain services, or we may not be able to complete consultant or job applications.

6. HOW LONG WE KEEP PERSONAL INFORMATION

6.1 We may also retain personal information for as long as required by law or regulation or instruction of a contract.

6.2 We will never retain personal information for any longer than is necessary for the purposes we need to use it for.

6.3 Generally, in respect of personal information gather in the context of a contract, we will retain personal information for the duration of the contract and a period of up to six years after the contract has expired or terminated, in case such personal information is required for the exercise or defence of a legal claim during this period.

6.4 Unsuccessful job applicant information is retained for a period of 12 months after the position

7. SHARING PERSONAL INFORMATION WITH THIRD PARTIES

7.1 We only share personal information with third parties:

- (a) To the extent necessary for fulfilling the purposes outlined in paragraph 5, including where necessary for the provision of services;

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- (b) Where we are under a legal or contractual obligation to do so; or
- (c) Where it is fair and reasonable for us to do so in the circumstances.

7.2 We may share personal information with the following third parties:

- (a) **Clients/Contract Managers:** Our organisation may be required to provide supporting evidence to clients and funding providers as proof of costs incurred in the provision of the agreed service provision.
- (b) **Suppliers:** We use a number of different suppliers, including IT suppliers, external auditors, employee engagement organisations and consultants, with whom we share personal information so that these suppliers can process personal information on our behalf. In these circumstances, we take steps required by data protection laws to ensure that these suppliers protect the personal information we share with them;
- (c) **Certification Bodies:** We may be required to share personal information with certification and regulatory bodies (including ISO, IIP) as part of certification / re-certification requirements to ensure that we are compliant with their rules and requirements when awarding certifications; and
- (d) **Government bodies:** We may be required by law to share personal information with government bodies and regulators (such as HMRC).

8. SENDING PERSONAL INFORMATION OVERSEAS

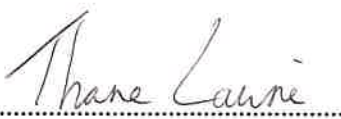
- 8.1 We do not currently need to transfer personal information outside the UK and the European Economic Area (EEA) for any reason to countries where data protection laws may not provide the same level of protection as those in the EEA - including China, the USA and India.
- 8.2 If the requirement arises in the future we will only transfer your personal information outside the EEA where either:
 - (a) The transfer is to a country which the EU Commission has decided ensures an adequate level of protection of personal information; or
 - (b) We have put in place our own measures to ensure adequate security as required by data protection laws. These measures include ensuring that personal information is kept safe by carrying out information security checks on proposed recipients.


9. PRIVACY RIGHTS

- 9.1 Individuals are entitled to exercise any of the following privacy rights in respect of our processing of personal information:
 - (a) **Access:** Individuals can request access to a copy of their personal information held by us, along with details of 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.
 - (b) **Rectification:** Individuals can ask us to change or complete any inaccurate or incomplete personal information held about them.

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- (c) **Erasure:** Individuals can ask us to delete their personal information where it is no longer necessary for us to use it, or where we have no legal basis for keeping it.
 - (d) **Restriction:** Individuals can ask us to restrict the personal information we use about them where we are not able to erase their personal information or where an individual has objected to our use of their personal information.
 - (e) **Object:** Individuals can object to our processing of their personal information.
 - (f) **Portability:** Individuals can ask us to provide them or a third party with some of the personal information we hold about them in a structured, commonly used, electronic format so it can be easily transferred.
 - (g) **Withdraw Consent:** Generally, we do not require consent to process personal information and so we do not ordinarily ask for consent to process personal information. However, where we do ask for consent to process personal information, individuals have the right to withdraw their consent at any time.
- 9.2 Please make all requests to exercise privacy rights in writing to lisa.moir@scarf.org.uk.
- 9.3 We are required to verify the identity of anyone requesting to exercise their privacy rights and we may ask individuals to provide valid identification documents when making a request to allow us to do this.
- 9.4 We will not make any charge for responding to any request from an individual exercising their privacy rights, and we will respond to any requests in accordance with our obligations under data protection laws.
- 9.5 Individuals can make a complaint about how we have used their personal information to us by contacting us as noted above, or to the ICO (<https://ico.org.uk/concerns/>).


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Thane Lawrie, Scarf CEO


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Date

