

# Privacy Policy

We, Recoup Energy Solutions Ltd, use your personal data to fulfil our contractual, business and legal obligations, and to provide information about our products, along with associated information connected to waste water heat recovery systems, technology and processes.

Recoup Energy Solutions Ltd takes your privacy very seriously and treats all your personal data with great care. Recoup Energy Solutions Ltd acts in accordance with the applicable data protection legislation. In this privacy policy we will describe how we collect, store and use your data. There are steps you can take to control what we do with your data and we will also explain those steps within this policy.

When we talk about data and personal data we mean any data which identifies you or which could be used to identify you such as your name, address and any contact details.

## 1. Who is responsible for your data?

Recoup Energy Solutions Ltd is responsible for your data. Recoup Energy Solutions Ltd is also referred to or known by Recoup or Recoup WWHRS in some documentation and communication. These are shortenings of the official company name of Recoup Energy Solutions Ltd for convenience and ease of communication.

Our registered address is Trumpeter House, Trumpeter Rise, Long Stratton, Norfolk, NR15 2DY, our postal contact address is Recoup Energy Solutions. PO Box 365, Eye, IP22 9BH. We are registered as a UK company under **company number 07842019**. We are the data controller and processor of the data which we collect, we control the ways your personal data are collected and the purposes for which your personal data are used.

## 2. What data do we collect?

Our business predominately involves business-to-business communication and dealings with companies and organisations that are or may be specifically interested in the products that we provide.

We do not specifically target contact with the end users of our products, meaning individuals and property residents. However, there are instances that we are in communication with individuals that are end users and are not connected with a company or organisation.

We previously provided a registration app to register the installations of our products as part of complying with SAP requirements. As part of the registration process data was collected for the contact at the company or organisation, or the individual that is registering the product installation. The use of this app ended in 2020 any data that had been collected was held but no further data is being collected from it.

Throughout the above, we do not collect or hold any forms of sensitive personal data, no special category data, and no criminal offence data.

### a) Companies & Organisations

The data that we collect, and hold, is only for the types of companies and organisations that would be interested in, have used, or may have used our products. This includes but is not limited to Housebuilders, Architects, M&E designers, Property managers, Hotel construction, Social housing sector, Eco-technology sectors, Plumbing and Heating.

Part of the company or organisation data would include contacts within the company that are owners, employees or in some way connected to the companies and organisations that we are working with, communicating with, or providing information to.

The data that we would collect, and hold, would include some or all of the following: -

- The name of the company or organisation
- The address and postcode of the company or organisation
- The geographical region the company or organisation works in
- The type of business for the company or organisation
- The first and last name of a contact or contacts at the company or organisation
- A contact email address of the contact at the company or organisation
- The telephone or/and mobile number for the contact at the company or organisation
- The job role of the contact at the company or organisation

#### **b) Individual and residential contacts**

As noted above we do not specifically target contact with the end users of our product and primarily focus on business-to-business communication. However, there are situations where we would collect and hold data for individuals. The two main sources of this data would be from contracts or purchases directly with the individual (end user) or where an individual has signed up to our mailing list.

The data that we would collect, and hold, would include some or all the following: -

- The first and last name of the individual
- A contact email address of the individual
- The telephone or/and mobile number of the individual
- The address and postcode of the individual

#### **c) Installation registrations by Recoup WWHRS app (retired 2020), website form and manually**

Our registration App was supplied by the Apple App Store and by Google Play. Both required user registration with their sites. Each has its own privacy policy and rules which are in no way connected or affiliated with Recoup Energy Solutions Ltd. Users must ensure that they are fully aware of the privacy policies provided by Apple or Google before downloading the Recoup WWHRS App. Recoup Energy Solutions Ltd are in no way legally or ethically responsible for any personal data collected, stored or processed in obtaining the Recoup WWHRS App from either of these providers.

The use of the Recoup WWHRS App required the registration of some details prior to registering installations onto the system. This was to allow us to be able to locate any relevant installation information for the company, organisation or individual that registered it.

The data that we would collect, and hold, includes the following: -

- The name of the company or organisation
- The address and postcode of the company, organisation or individual
- The geographical region the company or organisation works in
- The type of business the company or organisation is
- The first and last name of a contact or contacts at the company, organisation or the individual
- A contact email address of the contact at the company, organisation or the individual
- The telephone or/and mobile number for the contact at the company, organisation or the individual
- The job role of the contact at the company or organisation

### **3. How have we collected the data that we hold?**

The data that we have collected, and hold, has come from several sources which are listed below.

These include: -

- Previous and existing customer contracts
- Business meetings
- Presentations

- Conferences
- Exhibitions
- Direct contact and enquiries by phone or email
- Contacts through our website
- Contacts through social media
- Sign-ups to our mailing list
- Research of relevant business contacts on the internet and openly accessible directories
- Projects in the Glenigan Ltd and Barbour ABI construction sales lead listings.

## 4. How do we use the data that we hold and what are the legal grounds for processing?

We use the data we collect from you for a range of different business purposes and according to different legal grounds of processing. The following is a summary of how and according to which legal grounds we use your data.

### a) Contract

Data processed under the legal grounds of contract can be for companies, organisations or individual customers collected based on us providing sale of our products or the enquiry into doing so. This data is held and processed to allow us to supply quotations, negotiate sales, provide technical support, register installations, fulfil contractual obligations, promote other products of interest and supply information associated with the technologies that we provide.

### b) Consent

Data processed under the legal grounds of consent covers data where the company, organisation or individual has specifically provided us their consent to process their data. Consent mainly covers data that has come from specific requests to be added to our mailing lists. These consents would either be via direct communication to us or through sign-up to our mailing list from our website. Our mailing list is only used for emailing our newsletter e-shot to promote our products, inform of company and industry related news, and supply associated information connected to waste water heat recovery systems, technologies and processes.

### c) Legitimate Interest

Data processed under the legal grounds of legitimate interest covers any data that is not contractually sourced or not covered by specific consent. This data is only for companies and organisations as the contacts and data collected is sourced specifically for business-to-business communication. The processing of this data serves our own commercial interests. In many cases it is also intended to serve the commercial interest of the recipient too. Processing involves us promoting our products, informing of company and industry-related news, and supplying associated information connected to waste water heat recovery systems, technologies and processes. The processing of this data is done in ways that would be reasonably expected by the recipient and has minimal privacy impact.

## 5. How do we protect your data?

We protect your personal data against unauthorised access, unlawful use, accidental loss, corruption, or destruction. Access is limited to individuals working for Recoup Energy Solutions Ltd and only where their working role requires access to the specific data held.

Data storage is protected by a password, both on the computers that hold the data and the software used to operate it. Likewise, any data held within electronic address books or on mobile devices is also password protected. Our email mailing list is held with an online provider specialising in email marketing who has their own data protection procedures with password-protected access to our profile and list with them.

## 6. Do we share your data or send it elsewhere?

Recoup Energy Solutions Ltd only shares data with other parties when consent has been provided by the data owner verbally or in writing. The main situation where this applies is for price and supply enquiries where Recoup Energy Solutions Ltd forwards that enquiry to a supply partner. The supply partner requests that this consent is provided before receipt of this data. From this point the supply partners' own privacy policy takes effect.

Recoup Energy Solutions does not share any other personal data that we hold with any other companies, organisations or third parties. The data is purely for business purposes and information provision by Recoup Energy Solutions Ltd.

The installation registration details of Recoup products may be provided to BRE (Building Research Establishment) or other associated companies and government departments involved with SAP recording and monitoring but any details provided will not include any personal data of those who registered the products, whether that be a company or organisation employee or individual. That information is kept within Recoup Energy Solutions Ltd and would only be shared with the individual, company or organisation that requested the installation information.

## 7. What are your rights?

You have the right to be informed about our holding and use of your data as we are setting out in this policy.

You are entitled to access and see copies of all personal data held by us and to amend, correct or delete any data that you wish. You can also limit, restrict or object to the processing of your data. You can contact us as described in the following section to request copies of any data that we hold. You can also use this process to request the erasure of your data.

You have the right to have any incorrect or inaccurate data rectified. We will do this if you advise us that data needs to be corrected or if during communications with you we become aware that data we hold is incorrect.

If you have entered into a contract and purchased goods from Recoup Energy Solutions Ltd then even if you ask for data erasure we may need to retain some data associated with the purchase and contract legally for a specific period. This would be to either validate guarantees or warranties or to comply with any accounting requirements associated with the contract and purchase. We would advise if this was the case and for how long it would be retained at the point data erasure is requested.

If you have given us your consent to use your data by registering to receive our marketing emails, you can withdraw your consent whenever you like. This can be done by unsubscribing from any marketing messages that we send or by contacting us directly to request removal or full data erasure. Please note that even if you withdraw your consent, we can still rely on the consent you gave as the lawful basis for processing your data before you withdrew your consent.

You can object to our use of your data where we rely on our legitimate interests to do so. The legitimate interests we use to process your data are explained in the previous section 'What are the legal grounds for our processing of your data?'. You can unsubscribe from our mailing list via any message that you have received. Or you can contact us and request the removal of your data from our marketing list or for the complete removal of all your data from our systems.

When you get in touch, we will come back to you and action any requests as soon as possible. Unsubscribing from mailing lists will be done as soon as received and before any further mailings are sent. Erasure of data will be completed as soon as possible but may require us to confirm back to you any justified reason and data details that we legally or contractually must retain. If your request is for copies of any data that we hold then this will be provided within one month as legally required. There is no charge for data requests, however, we may ask you to verify your identity before we provide any information to you.

You have the right to make a complaint about our processing of your data, either directly with ourselves or the supervisory authority responsible for the protection of personal data. Details of how to do this are included in the following section 'Making a complaint'.

## 8. How long do we keep your data for?

We retain your data for as long as necessary for the purposes it was collected or for other essential purposes such as complying with our legal and accounting obligations, resolving disputes, providing product guarantees and enforcing our policies.

Requests to unsubscribe your details from mailing lists will not necessarily remove all personal data from our background systems as we would keep some details on file to ensure that your request is followed in the future and your details are not reinstated. The data we retain will only be enough to identify you as a previous contact who has unsubscribed from our list.

If a specific request is received to remove all your data from our systems, then we will do this complying with your right to request erasure unless this conflicts with any of our legal or accounting obligations.

## 9. What to do if your details change?

Recoup Energy Solutions Ltd is legally required to ensure that the data that we hold is accurate and up to date. If we discover that data is incorrect then we will correct it or remove it as necessary. If your details change and you wish to continue to hear from us, then contact us as detailed below and we will update the data we have recorded. Likewise, if your situation changes (change of job role or company) and the information that we provide is no longer relevant then contact us and we will remove your details from further future contact.

## 10. Making a complaint

If you have any complaints concerning Recoup Energy Solutions Ltd's processing of your personal data, please email us at [info@recoup.co.uk](mailto:info@recoup.co.uk) or write to us at Recoup Energy Solutions. PO Box 365, Eye, IP22 9BH.

We will always act upon any complaint or request for the removal of personal data but please note that you have the right to lodge a complaint with the supervisory authority which is responsible for the protection of personal data. The Information Commissioner's Office is the UK body responsible for the protection of personal data, they can be contacted by telephone on 0303 123 1113 or by their website [www.ico.org.uk](http://www.ico.org.uk).

## 11. Contacting Us

You can contact us at Recoup Energy Solutions Ltd by phone on 01379 844010, by email at [info@recoup.co.uk](mailto:info@recoup.co.uk) by live chat or contact form on our website, [www.recoupwwhrs.co.uk/contact-us](http://www.recoupwwhrs.co.uk/contact-us) or by writing to us at Recoup Energy Solutions. PO Box 365, Eye, IP22 9BH.