



Privacy Notice For Home Energy Upgrade Loan Scheme (HEULS)

To Facilitate Home Energy Upgrade Loans

April 2024 Edition

General statement - We respect your privacy

This Privacy Notice (“**Notice**”) is intended to help you understand what Personal Data the Sustainable Energy Authority of Ireland (“**SEAI**”) processes about you if you apply for a loan under the Home Energy Upgrade Loan Scheme (“**Loan Scheme**”) delivered by the Strategic Banking Corporation of Ireland (“**SBCI**”).

Low-cost loans under the Loan Scheme are available through participating finance providers for homeowners undertaking upgrades that are also grant-aided under certain SEAI grant schemes. Homeowners availing of low-cost loans under the Loan Scheme must apply for a grant using an intermediary. The relevant SEAI grant schemes and intermediaries are:

- The National Home Energy Upgrade Scheme (using a One Stop Shop)
- The Better Energy Homes Scheme (using an Energy Partner/Counterparty)
- The Communities Energy Grant Scheme (using a Project Co-Ordinator)

This Notice also details the rights available to you in relation to how we hold and use your Personal Data, how to exercise those rights, and what to do if you require more information or wish to make a complaint.

Who is responsible for your information

This Notice applies to SEAI, a public authority established under the Sustainable Energy Act 2002, located at 3 Park Place, Hatch Street Upper, Dublin, D02 FX65. The use of “we”, “us”, “our” and “ours” in this Notice refer to SEAI. For more information about us, please see our About webpage <https://www.seai.ie/about/>.

If you want to get in touch and seek to exercise your rights as described below, please contact us at dataprotection@seai.ie.

Who this Notice Applies To

In order to support the Loan Scheme, SEAI may share certain information about you with SBCI, who are responsible for delivering the Loan Scheme. SBCI may, in turn, share this information with other stakeholders in the Loan Scheme, including participating finance providers, the Minister for the Environment, Climate and Communications, the Department of the Environment, Climate and Communications, the European Investment Bank, and the European Investment Fund. This sharing may take place even where you may not have a direct relationship with SEAI (e.g., where a One Stop Shop, Energy Partner or Communities Project Co-Ordinator applies for an SEAI grant on your behalf).

Who We Receive Information From

We receive certain information from SBCI in order to carry out searches necessary to provide SBCI with the information it requires to manage the Loan Scheme. The information that we receive from SBCI to carry out these searches includes the meter point reference number (MPRN), the date ranges for the information that SBCI requests and the Eircode (in certain circumstances).

Information we process

In addition to the information in section 4 above, we also process and share the following types of Personal Data with SBCI:

- details of grants you apply for (including verifying the existence of a valid grant application and any change in the status of that application);
- details of your property (pre and post upgrade works) such as:
 - size;
 - building energy ratings;
 - energy performance indicators; CO₂ emissions indicators; and
- details of energy efficiency/renewable energy measures installed, including the costs of these measures as declared by you and/or the intermediary you use to apply for the grant.

How we use your information to support the Loan Scheme

We provide the Personal Data listed above to SBCI to confirm that the energy efficiency upgrade to your property has taken place and to support the management of the Loan Scheme by SBCI. We also carry out searches of our systems in order to identify this information about you/your property where requested by SBCI. For more information on how the SBCI processes your personal data, please refer to the SBCI Data Protection Statement available [here](#).

Information You Give Us About Other People

If you provide information to us about any person other than yourself, you should ensure that you have a legal basis for doing so and that you have complied with your transparency obligations under data protection law.

Our Legal Bases

In order to process your information for the purposes described above, we rely on the lawful basis of necessity for the performance of tasks that we carry out in the public interest or in the exercise of official authority vested in us by law (including the Sustainable Energy Act 2002).

Sharing Your Information

In the course of supporting the Loan Scheme, in addition to sharing the Personal Data above with SBCI, we may also share information with various third parties, as set out below.

- **Service Providers:** Categories of service providers include outsourced business process providers, IT service providers and records-storage companies.
- **Experts, advisers, lawyers and others:** We share your information with a variety of third parties. This may include sharing your information with advisers, solicitors and law firms, other experts and auditors.
- **Legal and safety reasons:** We may retain, preserve, or share your information if we have a good-faith belief that it is reasonably necessary to (a) respond, based on applicable law, to a legal request (e.g., a subpoena, search warrant, court order, or other request from government or law enforcement agency); (b) detect, investigate, prevent, and address fraud and other

illegal activity, security, or technical issues; (c) protect our rights, property, or safety; (d) enforce grant agreements or any other contracts we have with you or a third party which relates to you; (e) prevent physical injury or other harm to any person or entity, including you and members of the public. In these cases, we would typically rely on the lawful basis of defence of legal claims.

- **Research:** We may include your Personal Data in research studies to assess the impact and benefits of the Programme. The outcome of these studies may be published or we may publish individual case studies. However, we will ensure that you will not be identifiable in any such studies, without your consent, which will be separately obtained.

Retention

We may retain your information for as long as necessary in light of the purposes set out in this Notice, including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for SEAI to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider regulatory guidance, as appropriate.

Your Rights

You have a number of rights in relation to your information that we process. To exercise these rights, please contact us at dataprotection@seai.ie.

While some of these rights apply generally, certain rights apply only in specific circumstances. We describe these rights below.

- **Access:** You have the right to request access to your information that we control.
- **Data Portability:** You have the right to request that some of your personal information that you initially provided to us is returned to you or another controller in a commonly used machine readable format.
- **Rectify, Restrict and Delete:** You have the right to ask us to restrict the processing of your information or to rectify or delete your information. Please note that despite a deletion request, we may continue to process your information if we have a legal basis to do so.
- **Object:** If we process your information in the public interest, you can object in certain circumstances. In such cases, where legally required to do so, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.
- **Complain:** You have the right to submit a complaint about our use of your information with your local supervisory authority or SEAI's supervisory authority, the Irish Data Protection Commission.

These rights are subject to a number of exceptions under law.

Amending The Notice

From time to time, we may amend this Notice. If we make material changes to the Notice, we will take steps to notify you, such as by posting a notice on our website. The Notice was last updated at the date indicated further below.

Contact Us

If you want to exercise your rights (described above), or if you have any questions about this Notice, please contact us as follows:

Data Protection Officer
Sustainable Energy Authority of Ireland
3 Park Place
Hatch Street Upper, St Kevin's
Dublin 2

Tel: +353-1-8082100
Email: dataprotection@seai.ie

Last updated: April 2024