



Privacy Notice

## SOLAR PV FOR MEDICALLY VULNERABLE SCHEME

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## Privacy Notice

### 1. General statement - We respect your privacy

The Sustainable Energy Authority of Ireland (“SEAI”) fully respects your right to privacy. This Privacy Notice (“Notice”) is intended to help you understand what Personal Data SEAI collects about you, why we collect it, what we do with it, who we may share it with and how we protect it. When we talk about “Personal Data” in this Notice, we mean any information relating to you, either directly or indirectly.

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.

### 2. Who is responsible for your information

SEAI is the Data Controller and 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](mailto:dataprotection@seai.ie).

### 3. Who this Notice Applies To

In operating the Solar PV for Medically Vulnerable Scheme (“Scheme”), we collect and process information which relates to individuals who may not have a direct relationship with SEAI. We have described below the main types of individuals whose information we collect, use and otherwise process in connection with the Scheme.

- Applicants to the Scheme, i.e., persons making applications to the Solar PV for Medically Vulnerable Scheme;
- Beneficiaries of the Scheme, i.e., persons qualifying for installation of a Solar PV system;
- BER Assessors who provide certification post Project;
- Contractors who carry out works in the course of the Project.

### 4. Who We Receive Information From

We receive your information from a variety of sources, for example, from your Energy Provider who process and administer your application for participation with the Scheme on your behalf with SEAI.

We also obtain information from third parties, for example, information provided to us by the contractors engaged to carry out works or measures under this Scheme and a BER assessor may provide us with certain information in order to provide you with a BER certificate for your home.

## **5. Information We Collect and how We Use It**

In the course of administering the Scheme, we collect or receive information in different ways and relating to various groups of individuals (described in section 3 above). We use this information for a number of purposes, including those described further below.

The types of Personal Data that we collect and process include, but are not limited to:

- your name, address and contact details;
- Meter Point Reference Number (MPRN);
- information that your MPRN is registered on the Priority Services Register;
- any other Personal Data relating to you that is provided to us by your Energy Provider/Contractor or that we generate about you in connection with our relationship with you, including records of any consent you have given.

The Personal Data that is referred to above will be processed for the purposes of:

- performing our functions as a public authority and, in particular, in the administration and governance of the Solar PV Scheme, including carrying out inspections of properties, conducting research on the impact of the Scheme and development of case studies;
- contacting you if required and to respond to any communications you might send to us;
- complying with our legal obligations;
- protecting or enforcing our rights or the rights of any third party;
- establishing, exercising or defending legal claims;
- improving the services which we provide to you;
- improving our existing schemes;
- developing new schemes;
- responding to requests and providing information;
- monitor and evaluate compliance with the terms and conditions of the Scheme;
- detecting and preventing fraud and other crime; and
- a range of other activities which we are obliged to undertake, or which we have gained your consent to complete.

## **6. 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.

## **7. Our Legal Bases**

In order to collect, use, share, and otherwise process your information for the purposes described in this Notice, we rely on a number of legal bases, some of which are mentioned above, including where:

- necessary 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 Sustainable Energy Act 2002);

- necessary for the performance of a contract ;
- necessary for compliance with a legal obligation that applies to us;
- you have provided consent to us for the use of your Personal Data;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Where you have provided consent for the use of your Personal Data, you can withdraw it at any time by informing [solarpv@seai.ie](mailto:solarpv@seai.ie), however, this will not affect the lawfulness of processing which was carried out based on your consent prior to its withdrawal. Please note that the consequences of withdrawal of consent will deem your application to the Medically Vulnerable Scheme as withdrawn.

## 8. Sharing Your Information

In the course of administering the Scheme, we share information with various third parties, as set out below. We do this based upon the legal bases and exceptions mentioned in section 7 of this Notice.

- **Energy Provider:** *We will share your Personal Data with your Energy Provider for the administration and governance of the Scheme. For example, providing them with details on the outcome of inspections carried out on installations.*
- **Service Providers:** *We may share your Personal Data to help us administer the Scheme and communicate with you. Categories of service providers include companies who provide inspection services, outsourced business process providers, IT software and hosting providers and records-storage companies. Where such third parties are processors, these third parties are contractually required to use it only to provide their service to us and are contractually barred from using it for their own purposes.*
- **Experts, advisors, lawyers and others connected to the administration of the Scheme:** *We share your information with a variety of third parties so we can administer the Scheme . This may include sharing your information with advisers, solicitors and law firms, and other experts.*
- **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 the contracts we have with your Energy Provider, with you or with 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.*
- **Impact Research:** *We may use Personal Data in research studies to assess the impact and benefits of the Scheme. 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.*
- **Other Research:** *Where technical data may be required for research purposes, a process of de-identification of data will be undertaken. This process will remove any specific identification fields such as BER number, Meter Point Reference Number (MPRN), Specific Location Data (Address or Eircode) or any reference homeowner/ occupant. This process will also include rounding and banding of data along with any other method identified to further anonymise this data.*

## 9. 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.

## 10. 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](mailto: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 to SEAI's Data Protection Officer and/or with your local supervisory authority or SEAI's supervisory authority, the [Irish Data Protection Commission](https://www.dataprotection.ie/).

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

## 11. Transfer To Third Countries

We do not transfer your personal data to a third country or international organisation. Certain companies who process personal data on behalf of SEAI may transfer personal data for processing outside the EU, however this will only be done with the agreement of SEAI and with the assurance that appropriate safeguarding measures are in place to protect the data

## 12. Automated Decision Making

Automated decision making / profiling will not be applied to your personal data.

### **13. Amending The Notice**

From time to time, we may amend this Notice. This might happen, for example, where we make changes to the Scheme. 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.

### **14. 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

Tel: +353-1-8082100

Email: [dataprotection@seai.ie](mailto:dataprotection@seai.ie)

Last updated: April 2023