Privacy Policy

This Privacy Policy sets out how we, Greenstone Energy Solutions Ltd, collect, store and use information about you when you use or interact with our website, www.greenstoneenergy.co.uk (our **website**) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 31 May 2018.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller**: Greenstone Energy Solutions Ltd

- **How we collect or obtain information about you**:
    - when you provide it to us (e.g. by contacting us, providing information through our contact form or placing an order in relation to our goods or services),
    - from your use of our website, using cookies, and
    - occasionally, from third parties.

- **Information we collect**: name, contact details, email address, telephone number, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on and the geographical location from which you accessed our website (based on your IP address).

- **How we use your information**: for administrative and business purposes (particularly to contact you), to improve our business and website, to advertise our services, to analyse your use of our website, and in connection with our legal rights and obligations.

- **Disclosure of your information to third parties**: only to the extent necessary to run our business, to our service providers, where required by law or to enforce our legal rights and obligations.

- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event)**: No

- **How long we retain your information**: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and certain additional factors described in the main section below entitled How long we retain your information. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.

- **How we secure your information**: using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary.

- **Use of cookies**: we use cookies on our website including essential, functional, analytical and advertising cookies. For more information, please visit our cookies policy here: www.greenstoneenergy.co.uk/cookies-policy

- **Transfers of your information outside the European Economic Area**: In certain circumstances, we will transfer your information outside of the European Economic Area, including to the United States of America. Where we do so, we will ensure appropriate safeguards are in place, including, for example, that the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with the EU-U.S. Privacy Shield.

- **Your rights in relation to your information**
    - to access your information and to receive information about its use
    - to have your information corrected and/or completed
    - to have your information deleted
    - to restrict the use of your information
    - to receive your information in a portable format
    - to object to the use of your information
    - to withdraw your consent to the use of your information
    - to complain to a supervisory authority

- **Sensitive personal information**: we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

Our details

The data controller in respect of our website is Greenstone Energy Solutions Ltd (company registration number: SC364770) of 60 Queen Street, Edinburgh, EH2 4NA. You can contact the data controller by writing to Greenstone Energy Solutions Ltd at the above address or sending an email to marc@greenstoneenergy.co.uk.

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use a third-party server to host our website called UKFast, the privacy policy of which is available here: https://www.ukfast.co.uk/terms/privacy-policy.html. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the United Kingdom.

Use of website server log information for IT security purposes

Our third-party hosting provider collects and stores server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).
Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interests: we have a legitimate interest in using your information for the purposes of ensuring network and information security.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies on our website, including essential, functional, analytical and advertising cookies. For further information on how we use cookies, please see our cookies policy which is available here: www.greenstoneenergy.co.uk/cookies-policy

You can reject some or all of the cookies we use on or via our website by changing your browser settings but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third-party email provider to store emails you send us. Our third-party email provider Fasthosts and their privacy policy is available here: https://www.fasthosts.co.uk/terms/privacy-notice

Emails you send us will be stored within the European Economic Area on our third party email provider's servers in the United Kingdom.

We also back up emails on third party servers in the United Kingdom provided by Easyspace. You can access their privacy policy here: https://www.easyspace.com/terms-and-conditions

Contact form

When you contact us using our contact form, we collect the following information: your full name, telephone number, email address, post code, nature of enquiry and any information you include in the message field. We also collect any other information you provide to us when you complete the contact form.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact form will be stored the European Economic Area on our third party email provider's servers in the United Kingdom. For further information, please see 'Email' above.

We also back up emails on third party servers in the United Kingdom provided by Easyspace. You can access their privacy policy here: https://www.easyspace.com/terms-and-conditions

Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Information about your call, such as your phone number and the date and time of your call, is processed by our third-party telephone service provider and stored in the United Kingdom.

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information

Information you submit to us by post will be stored in the United Kingdom.

Information we collect when you interact with our website

Quotation system

We use a third party quotation system application on our website provided by TrueQuote. After you complete the TrueQuote questionnaire, we collect your name, email address, phone number and address if you would like us to contact you for a free, no obligation survey. If you do not provide this information, you will not be able to submit the form and we will no be able to carry out the free survey.

You can access TrueQuote's privacy policy here: https://truequote.co.uk/privacy

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Your information is stored by TrueQuote on their servers in the United Kingdom.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include business partners and those who recommend our services to you as well as third parties we work with such as Worcester, Bosch Group.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).
Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one), Which, Hampshire Trading Standards and Trustpilot.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Our use of automated decision-making and profiling

We use automated decision-making and profiling. We do not consider that this has any legal effect on you or similarly significantly affects you.

You have the right to object to our use profiling described in this section. You can do that by opting-out of cookies and similar technologies in accordance with the method described in the relevant section below. If you do not want us to process your actual IP address (usually the IP address assigned to you by your Internet Service Provider) when you visit our website, you can use a Virtual Private Network (VPN) or a free service such as Tor.

You can find out more about our use of cookies and similar technologies (including the legal basis on which we use them) and how to opt out from them in our cookies policy, which is available here: www.greenstoneenergy.co.uk/cookies-policy

Automated decision making

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement.

Use of automated decision-making for display network advertising

We automate the display advertisements containing our products and services on other websites you visit, you based on the fact that you have visited our website using cookies. For further information on the cookies we use, please see our cookies policy which is available here: www.greenstoneenergy.co.uk/cookies-policy

Logic involved: automatically displaying advertisements to individuals who have visited our website results in increased efficiencies and costs savings for us than manually displaying advertisements or displaying advertisements by different means.

Significance and envisaged consequences: cookies will be used to recognise the fact that you have visited our website in order to display advertisements to you (unless you have blocked such cookies) and will collect information about your online behaviour.

How to object: you can block these cookies by using the cookies control management tool on your site (if you use one) or by opting out of seeing personalised ads by following the instructions here: https://support.google.com/ads/answer/2662922?hl=en-GB. For further information, please see our cookies policy: www.greenstoneenergy.co.uk/cookies-policy

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you consent to our use of automated decision-making by turning on remarketing cookies using our cookie control tool.

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, Google Analytics uses collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on). We will only process information from cookies if you have consented to us setting cookies on your computer in accordance with our cookies policy (www.greenstoneenergy.co.uk/cookies-policy). Information collected about you, once collected is anonymised and stored on an aggregate basis.

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

Significance and envisaged consequences: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies by using our cookie control tool) and your location will be analysed based on your IP address. We may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: we have a legitimate interest in getting to know our website visitors' preferences and improving our website's effectiveness.

Use of profiling for Facebook advertising

We use profiling to advertise on Facebook and track conversions on our website. Information collected by Facebook in relation to its advertisements and the Facebook Pixel on our website is transferred by Facebook outside the European Economic Area. For further information and information on the safeguards used, please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Logic involved: by targeting individuals based on criteria such as what they have liked on Facebook, we are able to more effectively advertise our services to those who we think are most likely to be interested in purchasing them, making our advertising more cost-effective and relevant.

Significance and envisaged consequences: advertisements will be displayed to you on Facebook if you meet the relevant criteria which form the basis of our advertising campaign. If you click on any relevant advertisements displayed to you on Facebook, your behaviour will be tracked using the code (Facebook Pixel) which we have installed on our website (if you have consented to the use of such technologies on our website) and your actions on our site will be tracked and the information shared with Facebook (you can access Facebook's Privacy Policy here: https://www.facebook.com/about/privacy/).

How to object: if you accepted the use of Facebook Pixel using our cookie tool, you can use our cookie tool to turn it off and stop it processing your information as well. You can also opt-out of Facebook processing your information using Facebook Pixel by changing your ad settings in your Facebook account here: https://www.facebook.com/ads/settings
You can opt out of Facebook and other companies that participate in the Digital Advertising Alliance in Europe from showing you interest based ads by visiting http://www.youronlinechoices.com, selecting your country, clicking 'Your Ad Choices', then locating Facebook (and any other companies you want to block) and selecting the 'Off' option.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest: marketing our goods and services effectively.

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following:

- Telephone provider (UK),
- Email provider (UK),
- IT service provider (UK),
- Web developer (UK), and
- Hosting provider (UK).

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of all of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly by email and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to Google Inc. and Facebook

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: https://www.google.com/policies/privacy/partners/

We share information with Facebook to enable it to provide us with the information we need to run our advertisements effectively on Facebook and to run Facebook advertising campaigns. Facebook collects information about your interaction with our website using its Facebook Pixel and related cookies. You can find out more about what Facebook collects from third party applications and websites in its privacy policy which is available here: https://www.facebook.com/full_data_use_policy

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (https://www.google.com/analytics/terms/us.html).

You can opt out of Google Analytics by installing the browser plugin here: https://tools.google.com/dlpage/gaoptout

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, affiliates, business partners, independent contractors, and insurers.

Further information on each of these third parties is set out below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest: running and managing our business efficiently.

Accountants

We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are located in the United Kingdom.

Advisors

Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyer and public relations professionals. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

Our advisors are located in the United Kingdom.

Business partners

Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.

Our business partners are located in the United Kingdom.

Independent contractors

Occasionally, we use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them perform in relation to our business.

Our independent contractors are located in the United Kingdom.

Insurers

We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Our insurers are located in the United Kingdom.

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Legal basis for processing: necessary to perform a contract or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: we need to share your information with other companies in order to be able to meet our contractual obligations to you or to take steps at your request prior to entering a contract, for example because of the services or information you have requested.

We do not display the identities of all of the other third parties we may share information with by name for security and competitive reasons. If you would like further information about the identities of such third parties, however, please contact us directly via our contact form or by email and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such third parties, for example).

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that a fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).
Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales, or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you place your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry, or correspond with us for any reason, whether by email, via post or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for one further year, after which point we will delete your information.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);

- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information; and
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below.

We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Facebook

Facebook transfers information it collects from its advertisements and the Facebook Pixel on our website outside the EEA.

Countries of storage: United States of America and other countries. These countries are not subject to an adequacy decision by the European Commission.

Safeguard(s) used: where Facebook transfers your information outside the EEA they will ensure EU-

approved model contract clauses are in place, obtain your consent for such transfers or adopt other means under European Union law. EU-approved model clauses are standard data protection clauses adopted by the European Commission in accordance with its committee examination procedure under Article 93(2) of the General Data Protection Regulation. This is permitted under Article 46(2)(b) of the General Data Protection Regulation. Transfers on the basis of your explicit consent are permitted under Article 49(1)(a) of the General Data Protection Regulation.

Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers. You can access Google's privacy policy here: https://www.google.com/policies/privacy/

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: https://www.privacyshield.gov/welcome. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Greenstone Energy Solutions Ltd, 60 Queen Street, Edinburgh, EH2 4NA or sending an email to marc@greenstoneenergy.co.uk:

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third-party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: https://ico.org.uk/global/contact-us/

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/; and
- https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identity you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to Greenstone Energy Solutions Ltd, 60 Queen Street, Edinburgh, EH2 4NA or sending an email to marc@greenstoneenergy.co.uk:

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and

- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link; or
- **sending an email** to marc@greenstoneenergy.co.uk, asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here: www.greenstoneenergy.co.uk/cookies-policy

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to marc@greenstoneenergy.co.uk.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal. For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: www.greenstoneenergy.co.uk/cookies-policy

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