



DATA PROTECTION POLICY

WME needs to collect and use certain types of information about people with whom it deals to pursue its legitimate business interests. These include current, past and prospective customers, suppliers, WME's own staff, and others with whom it communicates. WME customers are public sector organisations and are not domestic customers. In order to conduct its business, WME customer contact details are passed to energy suppliers, meter operators, data collectors and partner companies of the energy suppliers that perform some aspects of the service e.g. metering work. In addition, WME may occasionally be required by law to collect and use certain types of information of this kind to comply with the requirements of government departments for business data, for example. This personal information must be dealt with properly however it is collected, recorded and used – whether on paper, by a computer, or recorded on other material - and there are safeguards to ensure this in the Data Protection Act 2018.

WME regards the lawful and correct treatment of personal information as very important to successful operations and to maintaining confidence between those with whom we deal and ourselves. We aim to ensure that WME and organisations acting on our behalf treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the Principles of Data Protection, as detailed in the Data Protection Act 2018, which requires that personal information is:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for it is processed;
- d) accurate and, where necessary, kept up to date; and take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Data subjects' rights

Members, staff and members of the public have the following rights in relation to their personal data:

- to be informed about what data is held, why it is being processed and who it is shared with;
- to access their data (Subject Access Request);
- to rectification of the record;
- to erasure of their data (where appropriate);
- to restrict processing (where appropriate);
- to data portability (where appropriate);
- to object to processing (where appropriate);
- not to be subject to automated decision-making including profiling (where appropriate).

WME will, through appropriate management, application of criteria and controls:

- observe fully conditions regarding the fair collection and use of information,
- meet its legal obligations to specify the purposes for which information is used,
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements,
- ensure the quality of information used,
- apply checks to determine the length of time information is held,
- ensure that the rights of people about whom information is held, can be fully exercised under the Act,
- take appropriate technical and organisational security measures to safeguard personal information,
- ensure that personal information is not transferred abroad without suitable safeguards,
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for personal information,
- set out clear procedures for responding to requests for personal information.

In addition, WME will ensure that:

- it has a Data Protection Officer,
- a Register of Processing Activities (ROPA) is maintained,
- a Data Retention and Disposal Policy is in place,
- personal data breach incidents are investigated promptly and appropriately and notified to relevant parties where there is a risk to individuals,
- wherever a third party who processes personal data on behalf of WME is used an appropriate written contract is in place,
- everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice and ensuring the confidentiality of information where required,
- everyone managing and handling personal information is appropriately trained to do so,
- anybody wanting to make enquiries about handling personal information knows what to do,

-
- queries about handling personal information are promptly and courteously dealt with,
 - methods of handling personal information are clearly described,
 - a regular review is made of the way personal information is held, managed and used,
 - a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against the Member or employee concerned.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2018.

In case of any queries or questions in relation to this policy please contact the Data Protection Officer, dpo@westmerciaenergy.co.uk.