PRIVACY POLICY

Sustainability First is a think tank that promotes sustainability, well being and fairness in the water and energy sectors.

We are a registered charity and undertake research projects with a range of partners from business, the charity sector and government.

We are committed to protecting your privacy and will only use the information we collect about you lawfully.

- We will never sell your personal data or share it with another organisation for marketing purposes.
- We only share your information when we are required to by law or with carefully selected partners who work with us.

We will amend this Privacy Policy from time to time to ensure it remains up to date and accurately reflects how and why we use your personal data.
The current version of our Privacy Policy will always be on our website:
http://www.sustainabilityfirst.org.uk/

Why we collect personal information:

- To undertake research
- For administration purposes

What types of personal information we collect:

- Personal details (including name, email, address, phone number, date of birth)
- Information relevant to particular projects such as data from smart meters. This would only be gathered with your permission.

We may collect information about you in the following ways:

- When you enter into a contract with us as an associate or researcher
- When you apply for a job or internship with us
- When you take part in a research project
- When you send us an email or contact us by telephone or post in relation to making an enquiry
- When you engage with us on social media
- When you visit our website – through our use of Cookies

- When we are required to pay you for services provided to us by an individual or organisation or for expenses incurred

Should you provide us with information in the ways outlined above, we may collect the following:

- Personal information: such as your name, email address, telephone number and other contact information (including details of your social media) to store with your account
- Financial details such as your bank details if we are making a payment to you, or you are making a payment to us
- Records of your correspondence with us, if you have contacted us

Sustainability First does not usually collect sensitive personal data such as health information, race, religious beliefs and political opinions. Where we do, we will display clear notices outlying why we have collected such information and why we need it.

Third Parties (other companies / organisations)

We sometimes receive personal data about individuals from third parties in relation to activities we conduct as an organisation for example as part of a research project.

We may use a number of sources to carry out our work, including company and organisation websites, printed and online newspapers and publications.

When you interact or submit information to us, we may use it to:

- Perform tasks as identified
- Comply with applicable laws and regulations
- Provide you with the services, products or information you have asked for
- Record any contact we have with you for internal administrative purposes

We collect and use personal data such as work email addresses to communicate with individuals in a professional capacity.

We will only use your information within Sustainability First for the purposes for which it has been obtained. This may mean that we sometimes share data with UK Government Departments or businesses for whom we are providing research. Sustainability First will not share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of giving your details to us.

We may need to share your information with “data processors”. These “data processors” will only act under our instruction and we will not allow these organisations to use your data for their own purposes and will take care to ensure that they keep your data secure. These “data processors” have all shown compliance with the General Data Protection Regulation and we have records of their compliance. We will also comply with legal requests where disclosure is required or permitted by law, (for example, to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

Your rights
These include:

- The right of access to a copy of the information we hold about you (a subject access request)

- The right to have your data erased (this does not apply where it is necessary for us to continue to use the data for a lawful reason)
- The right to have inaccurate data rectified
- The right to object to your data being used for marketing

Please note there are exemptions to the rights above.
If you would like further advice or information on your rights or wish to submit a request, please write to us at:

Sustainability First
85 Great Portland Street
First Floor
London
W1W 7LT

Tel: 020 3137 9798
info@sustainabilityfirst.org.uk

Registered Company no. 03897720
Registered Charity no. 1078994

DATA PROTECTION POLICY[1]
Sustainability First

Responsible Person	Sustainability First does not require a Data Protection Officer under the law. The Director is the responsible person and the Administrative Assistant is the day-to-day contact.

General Data Protection Regulation requirements

Sustainability First is committed to processing data in accordance with its responsibilities under the GDPR.

GDPR requires that personal data shall be:

a. processed lawfully, fairly and in a transparent manner;
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 which they are processed;
d. accurate and, where necessary, kept up to date; if any data is inaccurate, reasonable steps must be taken to ensure that it is erased or rectified without delay;
e. kept in a form which permits identification of data subjects only for as long as necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods for archiving purposes in the public interest, scientific or historical research or statistical purposes;
f. processed securely; including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

About this policy

a. This policy applies to all personal data processed by Sustainability First.
b. The Director will take responsibility for Sustainability First's ongoing compliance with this policy.
c. This policy will be reviewed annually.
d. Sustainability First is registered with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, fair and transparent processing

a. Sustainability First will maintain a Register of Systems to ensure our processing of data is lawful, fair and transparent.
b. The Register of Systems will be reviewed annually.

[1] Internal summary of data protection commitments and processes

c. Any requests from individuals to access their data will be dealt with in a timely manner.

Lawful purposes

a. All data processed by Sustainability First will be done on the basis of one of the following: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
b. Sustainability First will note the appropriate lawful basis in the Register of Systems.
c. Where consent is the lawful basis for processing data, evidence of opt-in consent will be kept with the personal data.
d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available.

Data minimisation

a. Sustainability First will ensure that personal data are adequate, relevant and limited to what is necessary.
b. The range of personal data held will be reviewed annually to see if any categories have arisen.

Accuracy

a. Sustainability First will take reasonable steps to ensure personal data is accurate.
b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
c. The accuracy will be reviewed periodically, and updated as necessary.

Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, Sustainability First will put in place an archiving policy for each area in which personal data is processed and review this process annually.
b. The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

a. Sustainability First will ensure that personal data is stored securely using appropriate means including modern software that is kept-up-to-date.
b. Access to personal data will be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
c. When personal data is deleted this should be done safely such that the data is irrecoverable.
d. Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Sustainability First shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).