



South Dublin County Council (SDCC)

Privacy Statement for the Sláintecare Healthy Communities Programme- Home Energy Assessments

Sláintecare Healthy Communities is a health and well-being initiative which seeks to reduce health inequalities across communities in Ireland. The Sláintecare Healthy Communities Programme (SCHP) is running an energy pilot project in Tallaght and Clondalkin which is available to households vulnerable to energy poverty. This project aims to explore the potential link between energy consumption and household health.

Participation in the project is entirely voluntary and the project seeks to include a total of twenty-five households in Tallaght, and twenty-five households in Clondalkin for this pilot programme.

The overall objective of the Sláintecare Healthy Communities Programme - Home Energy Assessments is to support and empower communities, in partnership with South Dublin County Council (“we” or the “Council”), to shape and build low carbon, sustainable communities in a considered and structured way to contribute to national climate and energy targets. This Privacy Statement applies to all personal data that is submitted to the Programme and serves to provide information on the purpose, type and scope of processing conducted by the Council in this regard, as well as to provide you, the relevant data subjects with all the information you need to assess and safeguard your rights.

- In **Section 1** you can find contact details for **SDCC as the Data Controller** responsible for processing your Personal Data.
- In **Section 2** the **purpose for processing your personal data** is explained.
- In **Section 3** you can find information about the **transfer of data to third countries**.
- In **Section 4** you can find information about **how long your personal data is stored**.
- In **Section 5** you can find information about **your rights**.
- In **Section 6** the **terminology used in this Privacy Statement** is explained.
- In **Section 7** you can find information about the **validity of and changes** to this Privacy Statement.

1. The Data controller

- a. The body responsible for processing any personal data submitted via a Community Climate Change Action Fund Application is:
South Dublin County Council
County Hall Tallaght,
Dublin 24, D24 A3XC
Phone: +353 1 414 9000

Email: info@sdblincoco.ie

- b. The Data Protection Officer for South Dublin County Council is:

Data Protection Officer

South Dublin County Council

County Hall Tallaght,

Dublin 24, D24 A3XC

Phone: +353 1 414 9000

Email: dataprotection@sdblincoco.ie

2. Processing your Personal Data

If you contact us in this regard and / or submit an application and/ or are selected for inclusion in the programme, we will process any personal data submitted in order to engage with you and your household as a potential applicant, to assess your eligibility for the programme, to carry out the energy assessment and to provide you with updates, outcomes and recommendations from the energy assessment, as well as a household energy pack. The personal data we process includes **Contact Data, Household Demographic Data and Energy Consumption Data**. We will also collect statistical data on the demographics of the household.

The special categories of personal data pertaining to the demographic of the participating households is immediately anonymized and processed as statistical data in accordance with Section 54 of the Data Protection Act 2018. Processing this data is restricted to an absolute minimum and is necessary in order to research if particular disadvantaged groups are more susceptible to energy poverty and in doing so to provide statistics that will assist in fulfilling the goal of the Sláintecare Healthy Communities Programme, namely, to improve the long-term health and wellbeing of the most disadvantaged communities in Ireland. This personal data is processed in accordance with Article 89 of the General Data Protection Regulation and the minimum amount of personal data is processed and the data is immediately anonymized.

We only process the personal data submitted to us in order to carry out our function as a Local Authority in implementing the Sláintecare Implementation Strategy and Action Plan. The goal of the Sláintecare Healthy Communities Programme is to improve the long-term health and wellbeing of the most disadvantaged communities in Ireland, objectively selected based on the Social Inclusion and Community Activation Programme (SICAP) areas. We will not use any personal data submitted to us for any other purpose and the personal data is only processed to the extent that is necessary.

We will process your Personal Data via service providers in order to help us in conducting and analysing the assessments. Service providers are so called "Data Processors" and the categories of service providers we use include IT software (for emailing, retaining data, analysing assessment data etc.), hosting providers and energy assessment service providers. The energy assessment service providers do not process special categories of personal data and only have access to your contact details to arrange the assessment appointment and any energy consumption information you provide them with during the assessment. The Council always concludes a Data Processing Agreement with all service providers to contractually ensure that any personal Data processed on our behalf by such Data Processors is processed in strict accordance with the Data Protection Acts, the EU General Data Protection Regulation, and only in accordance with our strict instruction. Information about the duration of storage of any personal data submitted can be found in Section 4 below.

3. Data Transfers to Third Countries

The Council takes every effort to ensure that your personal data is processed in the EU or in the European Economic Area. In cases where this is not possible and data needs to be transferred to a country outside of the EU, we will ensure, after prior review, that an adequate level of data protection that meets the requirements of the Court of Justice of the European Union and the EU Commission is adhered to in the country the data is transferred to and that a suitable transfer mechanism in accordance with Article 44 of the EU GDPR is in place.

4. Data Retention and Deletion

Generally, we only store your Personal Data for as long as necessary for the respective purpose or where we are contractually or legally obligated to store the data for a longer period. All Personal Data pertaining to the Sláintecare Healthy Communities Programme is stored electronically on a secure network. They are accessible by authorised staff only and are retained in accordance with the Council's Data Retention Policy. Energy Assessment Data and any associated communications will be retained for a maximum period of 1 year or for as long as the assessment is ongoing (whichever is shorter) in order to complete the assessments and any follow up recommendations and communications. All special categories of personal data are immediately anonymised, and only statistical data is retained in that respect. Upon completion of the assessments, the Council will only retain anonymised, statistical data in relation to the programme.

5. Your Rights

As the data subject you have the following rights in relation to Personal Data processed by us for this purpose:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent (Art. 7 (3) GDPR)
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)

Please submit your request to dataprotection@sdublincoco.ie and specify that you are seeking to exercise your rights in relation to the Community Climate Action Programme.

Please note, that we are obligated to verify your identity when processing a Data Subject Request. Your request will be retained by the Council for two (2) years. Any copies of proof of identity that we receive will be immediately destroyed after your identity has been verified. The legal basis for this processing is Art. 6 (1) (c) GDPR.

6. Terms Defined

The terminology used in this Privacy Statement has specific meanings defined in the EU General Data Protection Regulation (GDPR). Other terms which we explain below, along with the most important terminology from the General Data Protection Regulation:

- **“Contact Data”** means the name of the applicant / household that wishes to participate in the programme, a relevant email address, phone number and household address. This personal data is used to contact the applicants, assess their eligibility for the programme and arrange for the assessment and any pre or post assessment communications in this regard.
- **“Data Controller”** means an individual or legal entity, public authority, agency, or other body that, either alone or jointly with others, decides on the purposes and means of the processing of personal data. In the context of this Privacy Statement this is South Dublin County Council.
- **“Data subject”** means an identified or identifiable natural person to whom personal data can be attributed. In the context of this Privacy Statement, this is you.
- **“Data Processor”** means a natural or legal person who processes personal data on behalf of the controller.
- **“Data Protection Acts”** refers to The Data Protection Acts 1988-2018.
- **“Energy Assessment Data”** refers to the data relating to the household regarding their energy consumption as collected by the Energy Assessment Provider appointed by the Council. This data will include usage times of heating and household appliances, energy consumption routines, practices, and measures in place in the household and will be used to assess what energy efficient measures could be introduced.
- **“GDPR”** refers to the General Data Protection Regulation (EU) 2016/679
- **“Household Demographic Data”** refers to the number of household members, whether they are adults or children, their genders and their ethnicity. The gender and ethnicity data are immediately anonymised by the Council.
- **“Processing”** means any operation or set of operations performed in connection with personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction or erasure.

7. Changes to this Privacy Statement

This Privacy Statement is valid from December 2023 and will be reviewed at regular intervals and updated as necessary.