



Sustainability Privacy Notice – Technology to meet Environmental Targets

Date Approved by IGG: 12 December 2022
Date Due for Review: December 2025
Responsible Officer: Information Governance Manager / Sustainability Manager

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use or share personal information, your rights in relation to your personal information and how to contact us and the supervisory authority in the event that you have a complaint.

This Sustainability Privacy Notice – Technology to meet Environmental Targets, should be read in conjunction with the main WDH [Privacy Notice](#).

We are committed to contributing to the achievement of environmental targets and are currently operating several programmes aimed at:

- Increasing the energy performance certificate rating (EPC) of our homes.
- Reducing the energy consumption by customers.
- Reducing the carbon footprint of our homes.

This can involve installing smart devices such as thermostats, air bricks and heat pumps in our properties. A smart device contains a SIM (the same as used in a mobile phone) to connect to the internet and report the information collected. The SIM will be activated upon installation and we will collect and review time-based information, including but not limited to, occupancy, energy consumption, temperature and humidity. We rely on the lawful basis of Legitimate Interest to collect and process that information which identifies your property but not your name or the people living with you.

It is also in our Legitimate Interest to use the information collected in combination with our other records, when investigating breaches or potential breaches of a tenancy. We may use the information to investigate possible life-threatening situations to protect your Vital Interests.

If you wish to opt-out of data collection, please contact our Sustainability Team or Data Protection Officer, as detailed in our [Data Protection Rights Notice](#), for the SIM to be deactivated or removed.

Opting out may impact upon the functionality of the smart device and will limit our ability to give you energy advice.

We routinely share property data with organisations who contribute to the funding of improvements. This includes with the Department of Business, Energy and Industrial Strategy (BEIS) and you can read their Social Housing Decarbonisation Fund privacy notice [here](#).

You can read more about smart thermostats [here](#).

You can read about more about smart airbricks [here](#).

As this technology is relatively new, WDH and the Government carry out research on the effectiveness of these devices and attitudes towards them. We will only pass your details to the researchers with your additional Consent. You can read the Leeds Beckett University Research Participant Privacy Notice [here](#).