PRIVACY POLICY & DATA PROTECTION NOTICE

Sleaford & District Community Energy Limited (SDCE)

FCA Registration No: 9900 (Registered Community Benefit Society) | **Effective Date:** November 2026
Registered Office: 24 Maltkiln Close, Sleaford, Lincolnshire, NG34 7ZH | **Contact:** sdce.cbs@gmail.com | 07783 857861

1. DATA CONTROLLER IDENTITY & SCOPE

Sleaford & District Community Energy Limited ("**SDCE**", "**we**", "**us**", or "**our**") is a non-profit Community Benefit Society registered in England and Wales with the Financial Conduct Authority (**FCA Registration Number: 9900**), having its registered office at **24 Maltkiln Close, Sleaford, Lincolnshire, NG34 7ZH**.

For the purposes of the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**, SDCE acts as the **Data Controller** in respect of personal data collected through our website, online enquiry forms, community share membership applications, and parish or community energy project communications. Enquiries regarding data protection should be addressed in writing to the Society Secretary at the registered office above or by email to **sdce.cbs@gmail.com**.

2. PERSONAL DATA WE COLLECT

We adhere strictly to the principle of data minimisation and collect only personal data that is adequate, relevant, and limited to what is necessary for our community energy activities:

- **Website Contact & Enquiry Data:** Name, email address, telephone number, organisation or parish council affiliation, and the content of any message submitted via our online contact form or sent directly by email.
- **Site Nomination & Feasibility Data:** Contact details of parish clerks, building trustees, or landowners, together with property addresses, meter point details, and electricity consumption information provided for solar PV and battery storage assessments.
- **Membership & Statutory Register Data:** For individuals applying for a £1 community member share, we collect full name, postal address, email address, shareholding details, and payment confirmation as required under the Co-operative and Community Benefit Societies Act 2014.
- **Technical & Security Metadata:** Limited network routing information (such as IP address, browser type, request timestamp, and security headers) processed automatically to protect our website against malicious traffic and abuse.

3. PURPOSES & LAWFUL BASES FOR PROCESSING

Under Article 6(1) of the UK GDPR, we process personal data only where a valid lawful basis applies, as summarised below:

Processing Purpose	Categories of Data	UK GDPR Lawful Basis
Responding to general enquiries, parish nominations, and site feasibility requests	Name, email, phone, organisation, site/energy details	**Legitimate Interests** (Art. 6(1)(f)) or **Pre-Contractual Steps** (Art. 6(1)(b))
Administering Community Benefit Society membership and statutory registers	Full name, postal address, email, share holding	**Legal Obligation** (Art. 6(1)(c)) & **Contract** (Art. 6(1)(b))
Maintaining website security, DDoS mitigation, and form spam prevention	IP address, HTTP headers, security metadata	**Legitimate Interests** (Art. 6(1)(f)) in safeguarding network integrity
Sending community project updates or member notices (where opted in)	Name, email address, membership/subscriber status	**Consent** (Art. 6(1)(a)) or **Legal Obligation** for statutory member notices

4. THIRD-PARTY DATA PROCESSORS & INTERNATIONAL TRANSFERS

We do not sell, rent, or trade personal data to third parties. We engage a strictly limited number of trusted infrastructure providers acting as **Data Processors** under written Data Processing Agreements pursuant to Article 28 UK GDPR:

- **Cloudflare, Inc. (Content Delivery & Security):** Provides DNS routing, SSL/TLS encryption, and web application firewall protection. Cloudflare processes transient network metadata (including visitor IP addresses) solely to deliver our website

securely and block automated cyber threats.

- **Formspree, Inc. (Web Form Submission Handling):** Processes and relays enquiries submitted through our website contact forms to SDCE's official email inbox, applying anti-spam filtering and encrypted transmission.

Where Cloudflare or Formspree processes data outside the United Kingdom (including in the United States), such transfers are protected by valid UK GDPR international transfer safeguards, specifically the **UK Extension to the EU-US Data Privacy Framework** and/or the **UK International Data Transfer Addendum** to the Standard Contractual Clauses.

5. COOKIES & ABSENCE OF TRACKING TECHNOLOGIES

Zero Tracking & Advertising Cookies: SDCE does **not** use advertising cookies, behavioural profiling, cross-site trackers, or third-party marketing analytics (such as Google Analytics or Meta Pixel). Only strictly necessary technical measures—such as essential security tokens used by Cloudflare to distinguish legitimate visitors from malicious bots—may operate in accordance with Regulation 6 of the Privacy and Electronic Communications Regulations (PECR).

6. DATA RETENTION & INFORMATION SECURITY

In accordance with Article 5(1)(e) of the UK GDPR, we retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including satisfying any legal, regulatory, accounting, or reporting obligations:

- **General Website & Parish Enquiries:** Retained for as long as reasonably necessary to deal with your enquiry and any related follow-up correspondence, and periodically reviewed for secure deletion where no ongoing project or partnership arises.
- **Project, Lease & PPA Records:** Retained for the duration of the project assessment or 25-year lease/PPA lifecycle plus **6 years** following expiry or termination, in accordance with statutory limitation periods under the Limitation Act 1980.
- **Statutory Register of Members:** Maintained throughout active membership and retained thereafter in accordance with statutory record-keeping obligations under the Co-operative and Community Benefit Societies Act 2014.

We implement appropriate technical and organisational security measures—including HTTPS encryption in transit, role-restricted access controls, and multi-factor authentication on Society accounts—to prevent unauthorised access, loss, or disclosure.

7. YOUR RIGHTS UNDER UK GDPR & COMPLAINTS TO THE ICO

Subject to statutory exemptions under the UK GDPR and DPA 2018, you have the right to:

- **Access & Rectification:** Request a copy of the personal data we hold about you (Subject Access Request) and have inaccurate or incomplete data corrected.
- **Erasure, Restriction & Objection:** Request deletion of your personal data, restrict its processing, or object to processing based on our legitimate interests.
- **Data Portability & Withdrawal of Consent:** Receive personal data provided on the basis of consent or contract in a structured, machine-readable format, and withdraw consent at any time without affecting prior lawful processing.

To exercise any of these rights, please write to **sdce.cbs@gmail.com**. Before disclosing personal data, we may request reasonable proof of identity to protect your privacy; the statutory response period commences once your identity is verified. In accordance with Article 12(3) UK GDPR, we will respond within **one calendar month**, although this period may be extended by **up to a further two months** where a request is complex or we receive multiple requests (in which case we will notify you within the first month). If you remain dissatisfied with our response, you have the right to lodge a complaint with the UK supervisory authority, the **Information Commissioner's Office (ICO)**, at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, via **www.ico.org.uk**, or by telephone on **0303 123 1113**.