

DATA MANAGEMENT PLAN

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ABOUT THE PROJECT

Consumers Leading the EU's Energy Ambition Response through uptake of Heat Pumps (CLEAR-HP) is an ambitious adaptation of a tried-and-tested methodology, designed and developed to address consumers' needs, specifically in the adoption of heat pumps for space heating, cooling and domestic hot water production.

The **overall objective** is to facilitate consumers' access to heat pumps products by accompanying consumers throughout the whole purchasing journey, and by addressing financial and regulatory barriers.

The **specific objectives** are:

1. Consumer awareness and trust in heat pump products and available subsidies is increased and more than 40,000 consumers are ready to act and change their behaviour.
2. More qualified and skilled installers of heat pumps are available to consumers at national level.
3. Consumer investments in heat pump products increase.
4. Regulatory frameworks and financing schemes for easier adoption of heat pump products are simplified and more accessible for consumers.

Through the provision of trusted information, collective purchase schemes, an improved regulatory framework, and better access to qualified installers, CLEAR-HP will facilitate consumers' access to household renewables at an affordable price, thus allowing consumers to improve the energy performance and comfort of their homes and to reduce their energy bills in the long term.

The project activities cover [7 target countries](#), Belgium, Bulgaria, Italy, Portugal, Slovakia, Slovenia and Spain, where independent national consumer organisations are supported by BEUC, The European Consumer Organisation, the International Consumer Research & Testing (ICRT) and the European Heat Pump Association (EHPA).

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INTRODUCTION

The primary objective of Work Package (WP) 1 is to ensure the sound coordination, efficient operation and timely implementation of all CLEAR-HP activities.

Within the objective of providing the basic infrastructure for the smooth operation of the project, the purpose of this deliverable is to provide guidance and tools to the CLEAR-HP Consortium partners on how to ensure compliance with the General Data Protection Regulation (GDPR).

The project will involve the processing of consumer personal data as well as profiling during its delivery of collective purchases and therefore will always provide valid legal basis to process in the form of the performance of a contract such data through the landing pages of the collective purchase campaigns.

Data processing on the CLEAR-HP webpage is the same as for the BEUC website, where the webpage is hosted. BEUC will act as Data Controller in what respects the processing of personal data eventually collected in this webpage. The personal data processing is limited to the minimum in accordance with the data minimisation principles necessary for the proper functioning of the page and the applicable privacy policy is available on the main BEUC website.

All consortium partners will have an appointed Data Protection Officer (DPO). A contact e-mail address of the DPO shall be provided on the privacy policy on each campaign landing page, to be easily and swiftly reachable by participants. The DPOs will oversee the data processing operations carried out by the project partners to ensure all is in line with the GDPR requirements and other applicable legislation regulating processing of personal data.

GUIDELINES FOR THE COLLECTION OF PERSONAL DATA

The CLEAR-HP project aims to facilitate consumers' access to heat pumps by accompanying them throughout the whole purchasing process, and by addressing financial and regulatory barriers. This will be done by:

- Informing consumers on the availability, quality and suitability of heat pumps for their homes
- Identifying financing opportunities for consumers and addressing gaps with national authorities
- Exploring and developing partnerships with heat pump suppliers and installers at national and European level
- Launching collective purchase schemes based on 'purchase and install' packages which ensure quality and simplify the purchasing process, as well as offering consumers advice and support
- Up-skilling heat pump installers to give consumers the information they need
- Communicating to consumers the benefits of heat pumps to encourage new and future investments and interest



In order to execute the collective campaigns and monitor the project's results, gathering of personal data to organise the collective purchases will be carried out by the partners in the target countries. Participants will be appropriately informed using the performance of a contract and the Terms of Use as a valid legal basis for processing personal data. The Terms of Use on each CPC landing page will govern consumer participation in the collective purchase at all stages. Consortium partners will ensure clear communication about the data requested and its purpose, not only through the Terms of Use but also in the Privacy Notice.

The Consortium partners must guarantee that personal data processing aligns with GDPR regulations and be able to demonstrate compliance. While the general approach methodology for achieving this goal throughout the project is outlined below, a more specific Data Processing Agreement will be tailored and signed between DECO PROTeste and the partners implementing the campaigns due to the unique nature of this activity and the associated data processing.

PROJECT METHODOLOGY

During the project duration, the Consortium will provide consumers with consumer-friendly communication campaigns about the benefits of adopting heat pump technology (WP7) and try to get them to be involved in collective actions (WP5), thus guaranteeing access to lab-tested products (WP2), a selected and upskilled installer (WP6), and a trusted third-party contact point throughout their purchase journey (WP5).

In order to sign up to the collective purchase and receive a dedicated offer to instal a heat pump technology, participants will be required to fill in a campaign registration form after being presented with clear information on the project, specifically in the Terms of Use, in the Privacy Policy and through a short privacy disclaimer containing the most important information about the purposes of processing, the identity of controller and a description of the data subject's rights. Partners will respect the data minimisation, purpose limitation, and storage limitation principles and consumers will be fully informed about their data protection rights.

Following the registration form, participants will be asked to provide additional information through a dedicated survey. This survey aims to categorize interested consumers into three groups (A – households ready for a heat pump; B - households potentially adaptable for a heat pump; C - households not ready for a heat pump). The purpose of this survey will be to assess whether the registered consumer's household is heat pump ready, leading to an invitation to an informative workshop on national subsidies, potential renovations, and subsequent participation in the campaign's offer phase. As this data collection involves profiling, participants opting to take part will receive information explaining the purpose and rationale behind the profiling.

The sole objective will be to ascertain whether their homes meet the specified requirements for project participation.

Based on the consumer journey identified at proposal stage, consumers joining the campaign would be presented with the following consent requirements throughout the different steps of the campaign:



- **first check-in box** (mandatory) for participating / signing up to the collective purchase: consumers need to agree to the Terms of Use (ToU) of the collective purchase;
- **second check-in box** (mandatory) for agreeing to the privacy policy (each partner will have their own and will be in line with the GDPR);
- **third check-in box** (mandatory) check-in box for agreeing to the profiling to allow the organisation to understand what kind of service the consumer registering needs ahead of the purchase and installation of a heat pump.
- **fourth opt-in box (voluntary)** for consenting to the collection, handling and use of personal data for other specific purposes. In this case, **various separate consent boxes** will be necessary depending on the data processing purposes (e.g., receiving the consumer organisation's newsletter, etc).

Nevertheless, the Consortium is currently defining the concrete consumer journey throughout the campaign process and therefore the boxes mentioned above could differ. For this reason, a General Data Agreement will be drafted later on (it is expected in February/March 2024) and include more detail about the type of consent needed by the consumers, how it will be asked and the information that we will give to the consumers prior to the consent request.

Once the purchase offer has been finalised with the supplier, the participants who signed up for the collective purchase (first and second check-in boxes), have answered the dedicated survey, and have been categorised as consumer A or B, will receive the group purchase offer and will:

- a. be redirected to a specific landing page of the supplier where they can purchase the technology with group purchase deal, or
- b. be directly contacted by the supplier, which will have the contractual obligation to contact them back, arrange a home visit and, if the consumer is interested, sign a contract under the collective purchase conditions, or
- c. any other mode of claiming the group purchase offer that is to be determined and contractually agreed within the supplier selection process.

In case it is needed to share the contact information of the consumers with the provider (option b) above), we will ask consumers to provide their consent for the purpose of proceeding with the purchase and installation of the product, if applicable.

DATA PROCESSING

The campaign registration form as well as the profiling survey requested of the consumers to apply to a collective purchase will be done via the landing page of each collective purchase campaign. The consent form(s) for any other purpose (e.g. to subscribe to a consumer association's newsletter) will also be done via the landing page of each collective purchase campaign, which will ensure consent is duly recorded.

A specific Data Processing Agreement will be tailored and signed between DECO PROTeste and the partners implementing the campaigns, in order to further clarify the rules of Data management included in this Document, including specific mention of the data categories that will be requested from the consumers



during the registration phase, the purpose of data collection as well as the time period of data storage. In line with this Agreement, DECO PROTeste will have the responsibility to provide to the other CLEAR-HP partners all the necessary tools and services to create and maintain these group purchases, namely all the IT / BT technology, data base management, Backoffice tool to support contact centre customer support-lines (if needed) and campaign reports, necessary to execute collective purchase campaigns.

As the collective purchases will usually involve the DNS (Domain Name System) and Landing Pages of each one of the CLEAR-HP partner, each partner in the CLEAR-HP project's target country will act as the data controller of the personal data that will be processed in order to conduct the action and to provide the consumers with their benefits. Concurrently, to provide all the support that is required, DECO PROTeste will act as Data processor in what retains the CPCs as they will access and process the personal data collected on the website of each consumer association only for the purposes to which the data subjects participating in the campaign(s) have agreed with.

In case of any serious data breaches, that is, where there is a risk for the rights and freedoms of the individuals, all CLEAR-HP partners will report these to their national regulators responsible for data protection within 72 hours from becoming aware of such breaches. Consumers affected will also be informed immediately as specified in Article 33 and 34 of the GDPR. Partners will keep records of all breaches and of measures taken to remedy them.

Each partner shall commit to having a process to handle incidents derived from the processing of personal data. In case of incidental findings, for example when data are collected but are not strictly needed for the purpose of organising collective purchases, the partners will immediately delete the data. They will inform the consumer without undue delay whenever a data breach is likely to result in a high risk to their rights and freedoms.

Data collected for the execution of the collective purchase campaigns should be stored for 5 years after the end of the project, **i.e. 1 December 2029**. This long period is due to the reporting requirements of any LIFE project. Participants will be informed of this date via the privacy policy of the specific collective purchase campaign. The data may be kept for a longer period if the consumer has given consent to use of personal data for other purposes than the collective purchase (e.g. for direct marketing purposes).

If any CLEAR-HP collective purchase's participant asks for their data to be deleted, changed, provided a copy of it or seeks to exercise any other data subject right, the relevant partner(s) commit to responding within 30 days of the request.

During the campaigns, the consumer data that will be used for research and monitoring of results will be anonymized and aggregated. Specific data protocols will be put in place where needed for the anonymized data transfers between partners. DECO PROTeste will be in charge of the handling and analysis of the anonymized aggregated data collected for the purpose of the CPC.

DATA PROTECTION OFFICERS (DPO)

All Consortium partners have an appointed DPO within their organisation. A list of all responsible DPOs has been created and is available on the CLEAR-HP Consortium Sharepoint.

They have been informed about the CLEAR-HP project and its upcoming activities.

The contact of the DPO will be easily available on each Privacy Policy that consumers read before signing up to the collective purchase(s). In addition, the consumers interested in this action can also easily retrieve the DPO's contacts either by contacting the Consortium partners based on the information available on their websites.

Should there be a change in DPOs throughout the project's duration, Consortium partners will make sure to make all necessary changes on their website and inform the project coordinator but also to make sure that the e-mails of the previous DPO are forwarded automatically to the new responsible person. In order to simplify this procedure, we encourage that partners have a specific DPO general e-mail address that stays the same throughout the project.

Consortium partners are aware of the importance of data protection and privacy and the requirements of the GDPR and an information session on this topic was also provided during the Kick-off meeting on 18-19 September 2023.

CLEAR-HP WEBSITE

Data Protection and Privacy was also taken into consideration when creating the main project webpage. Only necessary cookies are used for the well-functioning of the page.

The privacy policy of the BEUC website – where the CLEAR-HP webpage is hosted - can be found [here](#). It may be that some changes are made during the implementation of the project, to ensure being in line with any update of the GDPR.

BEUC is the data controller for the purpose of this webpage.

