

Privacy Notice

Horizon Energy Infrastructure Ltd respects the privacy of the people we deal with and we uphold high standards of privacy practice and security. This policy explains how we handle personal information.

Whenever we handle personal information, we take steps to ensure that appropriate standards of privacy practice and security are applied. Personal Data processing shall always be in line with UK General Data Protection Regulations (GDPR).

Horizon Energy Infrastructure's privacy policy sets out why we need to collect personal information, how we collect it, what we do with it, how it is stored and who we might share it with. The policy also describes how you can exercise your rights to access your personal data, how you can ask further questions or make a complaint.

This Privacy Notice was last updated: 17 December 2020

Definitions:

The data protection notice Horizon Energy Infrastructure Ltd is based on the terms used by the UK General Data Protection Regulation (GDPR) but for ease of understanding the following definitions apply:

Consent: Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with other, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Member State Law, the controller or the specific criteria for its nomination may be provided for by Member State Law.

Data Subject: any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Personal Data/Personal information: any information relating to an identified or identifiable natural person ("Data Subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

Processor: a natural or legal person, public authority, agency or another body which processes personal data on behalf of the controller.



Head Office:
Brewery House
34 - 44 Gigant Street
Salisbury SP1 2AP

London Office:
7 Henrietta Street
Covent Garden
London WC2E 8PS

+44 (0)1722 568 039
admin@horizonei.co.uk
www.horizonei.co.uk

Horizon Energy Infrastructure Limited
Registered in England and Wales No 06844261
VAT Reg No GB 971 1722 24
ISO 9001:2015 Compliant

Definitions

Definitions:

Processing: any operation or set of operations which is performed on personal data or on sets of personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular enquiry in accordance with Union or Member State Law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Restriction of Processing: the marking of store personal data with the aim of limiting their processing in the future.

Third Party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and person who, under the direct authority of the controller or processor, are authorised to process personal data.



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Contacts

The Controller

Chief Executive Officer

Horizon Energy Infrastructure Ltd,

Brewery House, 34 – 44 Gigant Street, Salisbury, Wiltshire, UK, SP1 2AP

Phone: +44 (0) 1722 568039

Email: dc@horizonei.co.uk

The Data Protection Representative

Data Protection Representative

Horizon Energy Infrastructure Ltd,

Brewery House, 34 – 44 Gigant Street, Salisbury, Wiltshire, UK, SP1 2AP

Phone: +44 (0) 1722 568039

Email: dpr@horizonei.co.uk

A Data Subject may contact our Data Protection Representative directly with any enquiries relating to Data Protection

The Lead Supervisory Authority

Elizabeth Denham

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, UK, SK9 5AF

Phone: +44 (0) 303 123 1113

Email: casework@ico.org.uk

Website: <https://ico.org.uk>



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Cookies & other similar technologies

Cookies and other similar technologies:

We use session cookies and other similar technology on our website including Google Analytics.

Google Analytics:

When someone visits www.horizonei.co.uk, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We **do not** make, and **do not** allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Cookies:

A 'cookie' is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. The cookies Horizon Energy Infrastructure Ltd use is 1) to generate statistical data on how the visitor uses the website, and 2) to send data to Google Analytics about the visitor's device and behaviour. The length of time a cookie will stay on your computer or mobile device depends on whether it is a 'persistent' or 'session cookie'. Session cookies will only stay on your computer or mobile device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

Links to other websites:

This privacy policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statement/policy on the other websites you visit.

Your Communications and Marketing Preferences:

You can opt-out of receiving certain direct communication from Horizon Energy Infrastructure Ltd. If you wish to stop receiving emails from us, you can do so by emailing dsar@horizonei.co.uk or by contacting us on 01722 568039.



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Cookie Information

Cookie Type	Cookie Name	Provider	Expiry	Type
Necessary	Cookie Consent	horizonei.co.uk	1 year	HTTP
Statistic	_ga	horizonei.co.uk	2 years	HTTP
Statistic	_gat	horizonei.co.uk	1 day	HTTP
Statistic	_gid	horizonei.co.uk	1 day	HTTP
Statistic	collect	Google-Analytics.com	Session	Pixel

Cookie Name	Purpose	Cookie Information
Cookie Consent	Stores the user's cookie consent state for the current domain	Data is sent to Ireland (adequate)
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Data is sent to the United Kingdom (adequate) Prior Consent is not enabled
_gat	Used by Google Analytics to throttle request rate	Data is sent to the United Kingdom (adequate) Prior consent is not enabled
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Data is sent to the United Kingdom (adequate) Prior consent is not enabled
collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels	Data is sent to the United States (adequate) Prior consent is not enabled



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Lawful Purpose

Reason/Purpose for processing information:

The following is a broad description of the way Horizon Energy Infrastructure Ltd processes personal information. To understand how your own personal information is processed you may also need to refer to any personal communications you have received.

For most Products and Services, it is necessary for us to collect 'personal information' such as your name, email address, telephone number and other personal details where needed (such as work or home address).

Employment Applications

We collect personal information from you if you apply for a job with Horizon Energy Infrastructure Ltd. Where it is necessary for us to collect personal information, we may collect the following items of personal information: Name, Address, Phone Number, Date of Birth, NI Number, Passport Number, UK Visa and Immigration details.

Service Agreements

We collect personal information from you when you sign up to a Service Agreement with Horizon Energy Infrastructure Ltd. Where it is necessary for us to collect personal information, we may collect the following items of personal information: Name, Email Address, Phone Number and Work Address.

Sensitive Information

We **do not** collect sensitive information about you.

Health Information

We **do not** collect health information about you.

We collect information relating to the above reasons/purposes from the following sources:

- The Data Subject directly (e.g. from information entered into service agreements (contracts))
- The Data Subject indirectly (e.g. referral from work colleague)
- Publicly available sources (e.g. Companies House)
- Social Media (e.g. Twitter, LinkedIn)
- Research provided by Third Party providers (e.g. Consultants)



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Lawful Purpose

Reason/Purpose for processing information:

We process information relating to the above reasons/purposes. This information may include:

- Personal details
- Business activities of the person whose personal information we are processing
- Products and Services provided
- Employment details

We process personal information about our:

- Customers
- Clients and employees
- Complainants and enquirers
- Suppliers
- Advisers and professional experts

We use personal information about you for the purposes for which it was provided to us, including to:

- Satisfy the performance of a contract
- Administer and manage our Products and Services (including monitoring, auditing and evaluating those Products and Services)
- Communicate with you and deal with or investigate any complaints or enquiries

We may also use your personal information for related purposes which would reasonably be expected without your permission. For example, we may from time to time use your personal information to inform you of industry related opportunities or to provide information about products and services which we expect may be of interest to you.

However, if you don't want to receive such communications you can tell us by contacting our Data Protection Representative or any other Horizon Energy employee.

Horizon Energy Infrastructure Ltd **does not** and **will not** sell personal information about our customers for marketing purposes to other organisations or allow such companies to do this.



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Information Management

When your information is disclosed:

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary, we are required to comply with all aspects of the Data Protection Act (DPA), Privacy and Electronic Communications Regulation (PECR) and the UK General Data Protection Regulation (GDPR) as it applies, such as:

- As required by law or regulations, such as those relating to anti-money laundering and counter-terrorism financing or as required by a regulator
- To our service providers, who provide services in connection with our Products and Services (including archival, auditing, customer contact, legal, business consulting, banking, payment, delivery, data processing and technology services)
- As contained in the terms and condition of our Product or Service

Where necessary or required we share information with:

- Business associates and other professional advisers
- Financial organisations
- Current, past or present employers
- Suppliers and service providers

If Horizon Energy Infrastructure Ltd is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

How we store your information:

We keep personal information in physical and electronic records, at our premises and the premises of our service providers, which includes storage within a cloud server managed environment. Where this occurs, we take steps to protect personal information against misuse or loss.

We also keep records of our interactions with you (including by email) and your enquiries or complaints.

Personal data collected by Horizon Energy Infrastructure Ltd shall be stored and processed within the EU. Horizon Energy Infrastructure's local servers are located within the UK.



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Information Management

We use 3rd parties to support us in providing our services and to help provide, operate and manage our internal IT systems e.g. Providers of Information Technology, Cloud based software and storage, website hosting and management, data backup, security and storage services. The cloud-based infrastructure is located in secure data centres within the EU and personal data may be held in any one of them.

Keeping information secure:

Horizon Energy Infrastructure Ltd is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure. For example, we store the personal information you provide on computer systems that have limited access and are in controlled facilities. When we transmit the data over the internet, we protect it using encryption.

While no service is completely secure, Horizon Energy Infrastructure Ltd takes precautionary measures to help prevent information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. For example, we ensure that our third-party data centre vendors provide adequate security measures. Additionally, your data is protected with encryption, such as Transport Layer Security (TLS) during transition over the internet.

Your personal information is stored on servers that are kept in a controlled environment with limited access. While we take reasonable precaution to guard personal information we collect from you, no security system is impenetrable.

- We encrypt all server replication/backup activities and use secure encrypted VPN to remotely access secured locations where personal information is held
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems
- We restrict access to personal information to Horizon Energy Infrastructure Ltd employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we delete the information or permanently de-identify it in accordance with relevant laws.



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Your Rights

Your Rights:

GDPR affords UK Data Subjects with rights. These rights are summarised below. In order to assert any of these rights, the Data Subject may contact the Data Protection Representative designated by Horizon Energy Infrastructure Ltd, any other employee or the DSAR (Data Subject Access Request) Team at any time. Email: dsar@horizonei.co.uk

You can read more about these rights [here](#).

The right of Confirmation: Each data subject shall have the right to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed.

The right of Access: Each data subject shall have the right to obtain from the controller, free information about his or her personal data stored at any time and a copy of this information. Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

Right to Rectification: Each data subject shall have the right granted by the UK legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to Erasure (Right to be Forgotten): Each data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have an obligation to erase personal data without undue delay where one of the statutory grounds applies, as long as the processing is not necessary.

Right to Restriction of Processing: Each data subject shall have the right granted by the UK legislator to obtain from the controller restriction of processing where a statutory reason applies.

Right to Data Portability: Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format.

Right to Object: Each data subject shall have the right to object, on grounds relating to his or her particular situation, at any time, to the processing of personal data concerning him or her.



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Your Rights | Legal Basis

Your Rights:

Automated individual decision-making, including profiling: Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling.

Right to withdraw Consent: Where consent forms the basis for processing, Data Subjects shall have the right to withdraw his or her consent to the processing of his or her personal data at any time. Data Subjects can contact the Data Protection Director or any other employee to withdraw consent.

Right to complain to the Supervisory Authority: Each data subject shall have the right to lodge a complaint with a Supervisory Authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement.

Legal basis for the processing of personal data:

The legal basis for processing shall be where:

- The data subject has given consent to the processing of his or her personal data for one or more specific purpose;
- Processing is necessary for the performance of a contract to which the data subject is party to or in order to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which requires protection of personal data, in particular where the data subject is a child.

The Legitimate Interests pursued by the Controller or by a Third Party:

Where the processing of personal data is based on our legitimate interest, it is to carry out our business in favour of the wellbeing of all of our employees and the shareholders.



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Data Transfer | Retention | Obligations | Profiling

Transfers:

It may sometimes be necessary to transfer personal information overseas. When transfers are needed, information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the General Data Protection Regulation and in accordance with the country-specific legislation applicable to Horizon Energy Infrastructure Ltd.

Retention of Personal Data:

The criteria used to determine the retention period of personal data is the respective statutory retention period within the Member State. After the expiration of that period, personal data shall be securely deleted, as long as it is no longer necessary for the fulfilment of the contract, the initiation of a contract, or in relation to other legal proceedings.

Contractual obligation of the data subject to provide the personal data and the possible consequences of failure to provide such data:

For clarity, the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when Horizon Energy Infrastructure Ltd signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded.

Automated decision-making & profiling:

Horizon Energy Infrastructure Ltd **does not** process personal data for automatic decision-making or profiling.



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Recruitment | General | Policy Changes

Data Protection for Employment & Recruitment Procedures:

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by e-mail.

If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provide that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interests could be complying with country-specific legislation, e.g. the UK equality Act 2010.

General:

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

Changes to our privacy policy:

Horizon Energy Infrastructure Ltd may modify or update this Policy when necessary to reflect customer feedback and changes in our Products and Services; so, please review it regularly. When we update this Policy, we will revise the 'Last Update' date at the top of this Policy. If there are material changes to the Policy or in how Horizon Energy Infrastructure Ltd uses your personal information, we will notify you either by posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to regularly review this Policy to learn more how Horizon Energy Infrastructure Ltd is using and protecting your information. Your continued use of the Service or Products after any modification to this Policy will constitute your acceptance of such modification and updates.



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