

## UK HYDROGEN AND FUEL CELL ASSOCIATION LTD (UK HFCA) PRIVACY POLICY

The UK HFCA is a trade body for the UK hydrogen and fuel cell sector. The Company must process personal data so that it can provide its various services. It has no staff, and management services are provided by Synnogy. As such, Synnogy acts as a data processor for the UK HFCA.

The UK HFCA has produced this Privacy Policy to outline how and why we collect personal information, what information is held, and how it is used, stored and disposed of. The policy is available on request.

The Privacy Policy applies to personal data that is held by UK HFCA and is underpinned by the following principles:

- Privacy is very important to us and we handle information accordingly.
- We will only process your information where we have legitimate business reasons to do so.
- We take appropriate physical and technological security measures to protect information regardless of where it's held.
- We train our staff on their privacy obligations.
- We do not transfer information outside the European Economic Area.
- We do not share information with other organisations without permission except where necessary, e.g. for legal reasons.

### Data held

The UK HFCA holds the following information:

Type of data	Source of data	Data held	Purpose	Handling	Duration held
UK HFCA membership prospects	Internet search (e.g. articles, linked-in), meetings, introduction via colleague / recommendation	- Name - Job title - Company - Email address - Phone number - Notes of interaction	To contact and engage directly with organisations (and occasionally individuals) which (who) might benefit from membership of	Excel Spreadsheet. Data is shared between staff to avoid duplication of effort or engagement. No external sharing of	As necessary to allow efficient engagement and avoid duplication / confusion for prospects unless otherwise

		- Additional comments	the UK HFCA. To maintain records of previous engagements to avoid duplication / confusion	spreadsheets, or individual contacts except with the express permission of the contact.	requested. No mass mail-outs
UK HFCA members	External organisation	- Name - Job title - Company - Email address - Address - Phone number	To deliver member benefits: - sharing of news - Invitations to events - Opportunities to contribute to UK HFCA documents	Excel Spreadsheet. Data is shared between staff to avoid duplication of effort or engagement. No external sharing of spreadsheets	For duration of membership (typically on yearly cycle), plus up to 2 years to allow follow-on and re-engagement, unless otherwise requested.
UK hydrogen and fuel cell stakeholders	Internet search (e.g. articles, linked-in), meeting, introduction via colleague / recommendation	- Name - Job title - Company - Email address - Phone number - Notes of interaction - Additional comments	To: - Update on news from the UK HFCA - Invite to UK HFCA events - Facilitate collaboration (one to one introductions)	Excel spreadsheet	As necessary to allow efficient engagement and avoid duplication / confusion for prospects unless otherwise requested.

The lawful basis the UK HFCA uses for this processing is "Legitimate Interest". This is covered in the GDPR. Where the UK HFCA has relied on a legitimate interest to process personal data our legitimate interests is / are as follows:

- To share and explore the opportunity for prospective members to get involved

- To manage and keep up to date details of prospective members so that they can be handled efficiently across the UK HFCA and over time.
- To deliver member benefits to UK HFCA members, as described above
- To facilitate wider engagement across the UK hydrogen and fuel cell community for mutual benefit (e.g. invitations to attend events.)
- To manage our database and keeping records up to date.

### **Data Protection Officer, security and GDPR awareness**

As mentioned above, the UK HFCA has no staff, and data processing is provided by Synnogy in its role as manager of the Association. Synnogy's Data Protection Officer is Celia Greaves, who is also an Executive Officer of the UK HFCA.

This Privacy Policy is shared internally to ensure awareness of GDPR. All computers have anti-virus and other protections, as well as password access.

### **Access to personal information**

All email communications include option to request access to, update of, deletion of, cessation of processing of and / or delivery to them of personal information, and to view Privacy Policy. Requests for updates are handled directly.