
Maen Hir Privacy Notice

Date Created: September 2024

Version: 1.0

Prosiect Maen Hir Privacy Notice

This privacy notice describes how we collect, store, use and share your personal data and information relating to Prosiect Maen Hir (the Project). For example when you:

- Subscribe or respond to our communications and consultation materials, such as marketing emails, feedback forms, newsletters and event notifications;
- Visit our website www.lightsourcebp.com/maenhir-cymraeg (Welsh) and www.lightsourcebp.com/maenhir-english (English); and
- Complete a land interest questionnaire.

Who we are

The entity responsible for the processing of personal data and information is Lightsource bp whose registered office is at 7th Floor, 33 Holborn, London, United Kingdom, EC1N 2HU.

Lightsource bp is responsible for the personal data and information we collect and process for our own purposes. We're committed to maintaining the security and privacy of the personal data and information we process throughout the lifecycle of the Project.

Contacting us

Lightsource bp has appointed a Data Protection Officer who is available to handle any questions, or queries in relation to how we process your personal data or information, to exercise your rights, make a complaints, or to discuss our practices, please use the following details:

- **Email:** privacy@lightsourcebp.com
- **Post:** FAO Data Protection Officer, Level 7, 33 Holbourn, London, EC1N 2HU

What personal data do we collect

Personal data or information identifies an individual. This could include information you provide to us directly, but also information gathered from other sources including publicly available sources and third-party providers. The types of personal data and information that we collect, and process are:

Identity and Contact Information: first name, last name, company name, title, age, date of birth, postal address and status, occupation, job title, email address and telephone numbers, information about your business (if it is affected by the proposed site) and photographs.

Opinions and Feedback: information about your relationship to the Project (including whether you are a local resident, local worker, elected representative etc), views on the Project.

Property data: information about property ownership.

Business data: information about businesses which own, operate from or use the property.

Financial Data: bank account details, information about the financial effects of the proposed site, value of your interests in land.

Technical Data: device identifiers such as internet protocol (IP) address, usernames or similar identifiers.

How we will collect your data

We use different methods to collect data from and about you including:

Personal data and information provided by you: The personal data and information that we collect depends on the context of your interactions with us, the choices you make, and the products you use. We will typically collect personal data and information directly from you via our website in-person, such as during a community event, or through correspondence from you, such as letters or emails from you.

Third parties or publicly available sources: To enhance our ability to contact you and to maintain and update our records, we may obtain information about you from other sources, such as public databases, third parties that are involved in the Project, developers, and from other third-party suppliers. We also collect some of your information from other third parties, including public records such as the HM Land Registry, Companies House, online registries, websites of organisation and information which may be obtained from a general internet search. Please note that we may combine personal data we receive from other sources with personal data you give us and personal data we collect about you.

Information automatically collected: We automatically collect certain information when you visit, use, or navigate our website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website, and other technical information. This information is primarily needed to maintain the security and operation of our website, and for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies, which you can read more about in our [Cookie Policy](#).

Why we collect your personal data and information

The following table sets out why we process your personal data and information and our lawful basis for processing your personal data, in accordance with applicable Data Privacy and Protection Legislation. We may rely on more than one lawful basis for processing your personal data depending on the context of the processing activity.

We will only use your personal data and information for the purpose for which it is collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data and information for an unrelated purpose, we will notify you and explain the lawful basis which allows us to do so.

Purpose	Lawful Basis	Personal Data Categories	Third Party Recipients
<p>Communicate and consult with you regarding the Project: Where the Project is in your area, our community engagement team will communicate with you in order to provide additional information about the Project, and to obtain your feedback.</p> <p>When we share this information for the purposes of the Consultation Report, we will not share your personal data or information, this will be limited to your comments, opinions and feedback only.</p> <p>We may also be required to send you statutory notices under the Planning Act 2008.</p>	<p>This process is necessary to comply with our legal obligations or is performed under our legitimate interests.</p>	<ul style="list-style-type: none"> Name Email address Address, including postcode Age Relationship to the Project (for example, local resident, landowner, elected representative etc) Contact Preferences Comments, Opinions and Feedback 	<ul style="list-style-type: none"> Microsoft Salesforce Adapt IQ Consultancies and Professional Advisors – Counter Context Limited Instinctif Partners Government Bodies Planning Agencies
<p>Carry out Land Referencing, land surveying and land values/compensation: When the Project is being planned, and at various stages during and after the application process we must carry out a process called land referencing, for individuals who are near the Project, or may have an interest in the land such as individuals who own, or rent the land.</p> <p>Information is sourced from publicly accessible sources such as HM Land Registry, and by circulating questionnaires.</p>	<p>This process is necessary to comply with our legal obligations.</p>	<ul style="list-style-type: none"> Name Email address Address Contact Preferences Nature and Value of your interest in the land 	<ul style="list-style-type: none"> Microsoft Salesforce Consultancies and Professional Advisors – Ardent Government Bodies Planning Agencies

<p>This information may be published in the Book of Reference that accompanies the application for the Project.</p>			
<p>Provide you with Project updates: if you have requested to be kept up to date with the results of a consultation, or other developments and updates about the Project, we will keep in contact with you using the method preferred by you.</p>	<p>This is performed under our legitimate interests.</p>	<ul style="list-style-type: none"> • Name • Email address • Address • Contact Preferences 	<ul style="list-style-type: none"> • Microsoft • Salesforce
<p>Negotiate agreements with individuals impacted by the Project: where necessary, it may be required to engage in negotiations with people affected by the Project, for instances to acquire land or rights from them.</p>	<p>This is performed under our legitimate interests.</p>	<ul style="list-style-type: none"> • Name • Email address • Address • Contact Preferences • Business contact details • Signatures • Bank Details • Job title • Organisation 	<ul style="list-style-type: none"> • Microsoft • Salesforce • Adapt IQ • Docusign • Cetora Digital S.A (Brazil) • Law Firms (varies per country or jurisdiction) • Datasite
<p>Review and respond to your enquiries and feedback: When you submit an enquiry via an online webform, this information is reviewed by a member of our support team and passed onto the relevant department.</p>	<p>This is performed under our legitimate interests for us to respond to your enquiry.</p>	<ul style="list-style-type: none"> • Name • Contact Details • Enquiry Information 	<ul style="list-style-type: none"> • Microsoft • Instinctif Partners
<p>Complying with Regulatory Requests: including from government agencies, regulators and other third parties with legal authority.</p>	<p>It is necessary for compliance with a legal obligation.</p>	<ul style="list-style-type: none"> • Name • Business Contact Details 	<ul style="list-style-type: none"> • Various
<p>Reporting to the Secretary of State, Planning Inspectorate or local authorities on the consultation: This may involve passing your personal data to those parties, and in some cases, we are required to publish the data as part of the Planning Act 2008 consenting process.</p> <p>The Planning Inspectorate’s privacy notice can be viewed at https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices/customer-privacy-notice</p>	<p>It is necessary for compliance with a legal obligation.</p>	<ul style="list-style-type: none"> • Name • Email address • Address, including postcode • Relationship to the Project (for example, local resident, landowner, elected representative etc) • Contact Preferences • Comments, Opinions and Feedback 	<ul style="list-style-type: none"> • Government Bodies • Planning Agencies • Local Authorities

How long will we keep your Personal Data and Information?

We will only retain your personal data and information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, or reporting requirements. We review personal data on a case-by-case basis and document the period of retention for each.

If you have any questions or would like more information about the retention of your data, please contact us at:

privacy@lightsourcebp.com

Sharing your Personal Data and Information

We will share your personal data and information with third party providers to enable the business to function and to store information securely

We may share your personal data and information with our professional advisers including our land referencers and land agents (Ardent), our consultation and communications advisors (Counter Context Limited) and our legal advisors (Pinsent Masons LLP) for the purposes of the Project. We may also share your personal data and information (where required or permitted by law) with government bodies and law enforcement agencies.

“Third Parties” includes Third-Party service providers (including contractors and designated agents) and other entities within our Group (including the Parent Company of Lightsource SPV 204 Limited, and other Lightsource bp subsidiaries). We use third party providers for activities such as legal services, accountancy, administration, and IT services.

All our third-party providers and other entities in the Group are required to take appropriate security measures to protect your personal data and information in line with our policies.

International Data Transfers

As a global organisation, that utilises many industry leading systems, personal data is processed within countries such as the UK, USA and Europe.

Where we process your personal data and information in countries which are deemed to not have equivalent protection to the applicable Data Protection and Privacy Legislation in the country in which you reside, we have implemented appropriate measures to always ensure an adequate level of protection of your personal data and information. If you have any questions or would like more information about the safeguards, please contact us at privacy@lightsourcebp.com

Security

We have put in place appropriate security measures to prevent your personal data and information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data and information to those employees, agents, contractors and other third parties who have a business need to know and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data and Security incidents or Breaches and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

Third Parties will only process your personal data and information on our instructions, and where they have agreed to treat the information confidentially and to keep it secure.

Your Rights

Under applicable Data Protection and Privacy Legislation you have a number of rights related to your personal data and information. We may ask you for identification prior to disclosing any data, as we need to ensure we only disclose information to the person entitled to it. You have the right to:

- **Be Informed** about the personal data and information we hold about you and what we use it for. We meet this requirement by regularly reviewing, updating and providing you with access to this Privacy Notice.
- **Access** to your personal data and information (commonly known as a Data Subject Access Request (DSAR)). This enables you to receive a copy of the personal data and information we hold about you and to check that we are lawfully processing it.
- **Rectification** of the personal data and information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please keep us informed of any changes during your working relationship with us.
- **Erasure** of your personal data and information. This enables you to ask us to delete or remove personal data and information, where there is no good reason for us continuing to process it, including where you withdraw consent, if we are using your personal data and information based on your consent. You also have the right to ask us to delete or remove your personal data and information where you have exercised your right to object to Processing.
- **Object to Processing** of your personal data and information as follows:
 - where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground.; and
 - where your personal data and information is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data about you for such marketing.
- **Restriction** of processing of your personal data and information. This enables you to ask us to suspend the processing of personal data and information about you, for example if you want us to establish its accuracy, or the reason for processing it.
- **Portability** of the personal data and information you provided to us. This allows for you to receive the personal information and data you provided to us or for us to transmit it to another organisation.
- **Withdraw Consent** at any time, when we are processing your personal data or information solely on the basis of your consent. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- **Not to be subject to Automated Decision Making** including profiling, which produces legal effects or similar significant affects concerning you. For the avoidance of doubt, Lightsource bp does not undertake automated decision-making of this kind.
- **Make a complaint** to the Information Commissioners Office (ICO) in the UK. That said, we would appreciate the opportunity to first address any concerns you may have with you directly.

Note: the above rights do not apply in all circumstances, but we will always look to fulfil your request, or provide information on why we cannot fulfil it.

If you have any questions about this Privacy Notice, or how we handle your personal data and information, please contact the Data Protection Officer (DPO) at privacy@lightsourcebp.com

You can also contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
www.ico.org.uk.

Changes to this Privacy Notice

This Privacy Notice will be updated from time to time to reflect how we process and look after your personal data and information.

When any significant changes are made, we will communicate this to you our website, or by other means of communication such as email, so that you are able to review the changes and make an informed decision as to whether you want to exercise any of your rights.

Last Updated: 16th September 2024.