



Activating Community Engagement Privacy Policy

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	This Privacy Policy is based upon the Data Protection Strategy (NPg/ACE/DPS_001) and is written for individual participants to the GenGame and for community groups seeking access to the ACE Community Prize Fund		
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1. What is the ACE project?

The Activating Community Engagement (**ACE**) project is a trial to test whether residential customers are willing and able to provide a cost-effective geographically targeted **demand-side response (DSR)** service to distribution network operators (**DNOs**).

DSR is a way for DNOs to address localised network issues without the need to reinforce the network by rewarding customers that are able to make small changes to how and when they use electricity. On this trial, participants are rewarded for their participation in the form of a community prize scheme. The ACE project will be testing whether participants are willing to offer an appliance in their home for remote disconnection during peak periods and engage in a novel concept called GenGame as a means of channelling the rewards to a community group of their choice (in the event that the community group wins the prize scheme).

If proven to be successful, GenGame could provide DNOs with a tool to facilitate the expected growth in low-carbon technologies (LCTs), whilst keeping costs down for customers by deferring or avoiding the need for network reinforcement. The benefit of these cost reductions can then be shared directly with the customers who participate in DSR activities and indirectly with all other customers connected to the distribution networks.

The project will collect and utilise data that can be defined as Personal Data under the Data Protection Act 1998. This Privacy Policy describes how this data (and anonymised data derived from it) will be used in connection with the ACE project. Further information can also be found in the ACE Project Data Protection Strategy (NPg/ACE/DPS_001) available at www.npg-ace.com.

2. What personal data will be collected?

For the purpose of this Privacy Policy, when we refer to **personal data** or **personal information**, we mean information about an identifiable living person. The personal data collected from you includes your name, your contact information (such as your postal address, email address and telephone number), some general household information, your energy consumption at household and appliance level, the community group that you would like to support and the GenGame points that you earn from your participation. In detail, this data comprises the following:

Personal data	Contact information	Your name
		Your home address
		Your email address

		Your telephone number (landline and mobile)
		Whether you are on Northern Powergrid's priority services register
	Your general household information	Your house type and main form of heating
		The number of occupants in your house
		The age range of the occupants in your house
	Your electricity consumption	Your whole house energy consumption, which will be measured remotely and in real-time using a device that is sent to you
		The appliance that you choose to be controlled as part of the project and the energy consumption of that appliance measured via a smart plug that is sent to you
	Other	The community group that you choose to support
		Your GenGame points

Your name, contact information, general household information and the community group that you wish to support will be collected during the on-line registration process.

You electricity consumption data will be collected via the smart plug(s) and any additional monitoring equipment provided by GenGame Ltd. This information will be sent back to GenGame Ltd over your wifi broadband network.

Your GenGame points will be allocated by GenGame Ltd as the project progresses.

3. Who will access my data and for what purpose?

All personal data will be collected, held and processed by GenGame Ltd, a joint venture company owned by the ACE project partners, Oswald Consultancy Ltd and Jarmacoe Solutions Ltd. This data will be used by GenGame Ltd for the purposes of:

- (i) processing your application to, and participation in, the project;
- (ii) to send you smart plug(s) and any additional monitoring equipment;
- (iii) to administer the project and the associated competitions (including the administration of usernames and allocation of GenGame points);
- (iv) to seek periodic feedback in order to improve the gaming experience; and
- (v) to support the research carried out by Newcastle University for Northern Powergrid (as described below).

GenGame Ltd may engage third parties to carry out some of these tasks and where it does so it will ensure that those third parties look after your data. For instance, the hardware used to collect the energy consumption data is supplied by Current Cost Ltd and Wifi Plug Ltd who use their standard methodologies for collecting, storing, processing and protecting such data on their servers, which is then collected by GenGame Ltd for all the participants to this trial. Neither Current Cost Ltd nor Wifi Plug Ltd will be able to make any link between the energy consumption data and your identity. Serious Games International Ltd will administer trial eligibility and the league tables on behalf of GenGame Ltd and will have access to your post code, your username and your GenGame points. Only GenGame Ltd have access to the full data set listed in section 2 above, and only GenGame Ltd will be able to link your identity with the other information provided (i.e. your general household information, your electricity consumption, etc). For the purposes of the Data Protection Act 1998, GenGame Ltd is the data controller with respect to its use of your data as described here.

Northern Powergrid has engaged Newcastle University to carry out research into the project. GenGame Ltd will provide Newcastle University with access to your data in an anonymised form. This means that Newcastle University will have access to your general household information and your energy consumption information, but will not have access to any information that could readily reveal your identity.

GenGame Ltd will also provide Northern Powergrid with your identity and contact information to enable Northern Powergrid to:

- (i) occasionally contact you to seek your feedback about the project;
- (ii) send you updates and newsletters about the project; and
- (iii) to cross-reference your details with its priority services register for consumer protection purposes (as further described in section 6 below).

Northern Powergrid will not have access to your general household information, your electricity consumption data, the community group that you support or your individual GenGame points in a form that is readily linked to you (although Northern Powergrid will have access to such data on an anonymous basis and will have access to information about the community group that you support and your individual GenGame points in so far as this information is published alongside the username that you select). For the purposes of the

Data Protection Act 1998, Northern Powergrid (namely, Northern Powergrid (Northeast) Limited) is the data controller with respect to its use of your personal data as described here.

You will have the option of sharing selected data with other participants on the trial. For example, you may form mini-leagues and you may invite your friends either face-to-face or by any other means to join your league. This will, by necessity, involve you speaking to your friends to invite them to join your league and, once you have created your league you will be able to see the points allocated to your friends' usernames.

No data associated with individual participants collected as part of this trial shall be passed on to other third parties for marketing purposes.

In the event that it becomes necessary to do so, personal data may be disclosed to the police and other law enforcement authorities in connection with the prevention and detection of crime, and the prosecution and apprehension of offenders.

In the event that one of the organisations that processes your personal information or anonymised data in connection with the project sells or buys any business or assets, the personal information or anonymised data may be disclosed to the prospective seller or buyer of such business or assets. If any such organisation is, or substantially all of its assets are, acquired by a third party (or subject to a reorganisation within its corporate group), personal information and anonymised data will be one of the transferred assets.

4. How will my data be protected and used?

Only GenGame Ltd has the full data set. GenGame Ltd is responsible for ensuring the security of this dataset.

The data protection strategy for the project is based on the principle of privacy by design and data will be anonymised for research purposes. Further specific information about how your personal data, and anonymised data derived from such data, will be used is set out below.

Personal Data

- Your contact details will be used by GenGame Ltd to enable the delivery of GenGame kits, to administer your participation in the project and to notify you of the times of demand response events.
- GenGame Ltd will use your energy usage data to allocate GenGame points based upon the load offered for remote control and your response to demand response notifications.
- Your choice of community groups will be used by GenGame Ltd to ensure that your points from participating in the project are correctly allocated to the group of your choosing.

- Northern Powergrid will have access to your identity to enable cross-referencing with its priority services register (for the purposes described in section 6 below) and to occasionally contact you for feedback about the project. Northern Powergrid may also use your data to send you periodic updates and newsletters about the project.
- GenGame Ltd will ensure that other project partners only have access to anonymised data (as set out below). However, please note that GenGame Ltd may engage third parties to assist with some of the above activities and, in these circumstances, those third parties may have access to your personal data.

Anonymised Data

- The key principle of anonymisation on this project is to disassociate your identity from the general household information that you provide and from the energy consumption data obtained from the equipment located in your premises.
- GenGame Ltd will allocate you a unique reference which will be used as an anonymisation key. Only GenGame Ltd will see the entire customer data set.
- Upon registration you will be able to select your own Username or Game Name, which will appear in GenGame league tables together with your GenGame points. It is up to you to decide an appropriate username that you would be comfortable seeing published in the league table.
- Serious Games International Ltd will administer trial eligibility and the league tables and will have access to your post code, your username and your GenGame points for this purpose.
- Current Cost Ltd, the supplier of the whole house energy consumption monitoring device, will have access to no data other than the whole house energy consumption data and so will not be able to make any link between this data and your name and address.
- GenGame Ltd may require Wifi Plug Ltd (the supplier of the smart plugs) to post the plug(s) direct to you and, in these circumstances, Wifi Plug Ltd will have access to your name and address to enable them to post the plug(s) to you, but they will have no access to the data collected from these plugs (even when stored on their servers), which will be encrypted and protected by a password supplied to you by GenGame Ltd (and which will not be known to Wifi Plug Ltd).
- Newcastle University will be provided with access to anonymised data where a unique reference number is used in place of information that would enable you to be readily identified (i.e. your name and address). This will prevent Newcastle University from linking the identity of the trial participant to their energy consumption data and any household information that they provide. Newcastle University will have access to postcodes to enable them to undertake a demographic analysis of the response to the project, but data from households where there is only one property in a post code will be withheld from Newcastle University. Performance information will be aggregated by

Newcastle University against different variables (such as household types, postcodes, etc.) to enable an understanding to be developed on how different types of users engage with the GenGame. Only anonymised data will be published by the project.

- Northern Powergrid will have visibility of your name, address and contact details, but will not be able to see any link between this data and your general household information, your energy consumption data, the community group you support, your username or your GenGame points (although Northern Powergrid will have access to anonymised data and information about the community group that you support and your individual GenGame points in so far as this information is published alongside the username that you select). Northern Powergrid will use name, address and contact details data to send participants periodic updates and newsletters about the project, to invite feedback from participants and also to cross-check participants with the customers listed on its priority service register (for the purposes described in section 6 below). All feedback received via customer surveys will be anonymised by Northern Powergrid prior to any publication.

5. Consent for the use of personal data

By applying for and participating in the project, you agree to the use of your data in the manner contemplated by this Privacy Policy.

6. Priority Services Register (PSR) customers

The Priority Services Register is in place to help Northern Powergrid to prioritise restoration and provide appropriate support to certain customers under power cut situations.

PSR customers are not precluded from participation on the ACE trial and, whilst The GenGame DSR platform does not disconnect the whole supply, it is essential that any prospective PSR participants understand how their involvement in the trial will affect the operation of the appliances that they choose to connect to the smart plugs. This is important for all customers but, to ensure that PSR customers are sufficiently informed, the registration information will request all customers to identify whether they are PSR registered and will make it clear that they should ensure that they do not apply the smart plugs to any appliance on which they are medically dependent. Northern Powergrid will have access to the identity of all participants and will contact any PSR customers that have signed up to undertake an assessment and offer additional assistance if required. This may involve, with the participant's permission, a referral to other support agencies.

7. Data ownership

All personal data collected by GenGame Ltd during the GenGame sign-up process will be owned by GenGame Ltd. Responsibility for personal data collection, storage and processing lies with GenGame Ltd, who will anonymise the association between the household data and the energy consumption data from any information that could readily reveal the identity of a participant prior to sharing with research partners.

Northern Powergrid and Newcastle University will have access to the anonymised data set and any data that they produce from the processing of this anonymised data will be owned by Northern Powergrid.

8. Retention of personal data

All personal data collected will be retained by GenGame Ltd until the end of the ACE trial. All personal data will be destroyed by GenGame Ltd after completion of the trial in December 2017 unless the GenGame develops into an ongoing business proposition and you wish to continue engagement with the GenGame to participate in other DSR markets after the completion of the ACE project.

The personal data provided to Northern Powergrid and used by Northern Powergrid to send updates and newsletters to, and obtain feedback from, participants will be retained for the duration of the trial and deleted shortly thereafter. Northern Powergrid will retain the PSR data for a customer for so long as the customer is eligible and wishes to remain on the Northern Powergrid priority services register. Northern Powergrid will own the aforementioned data.

9. Retention and publication of anonymised data

Anonymised electricity consumption and household data will be retained by Northern Powergrid and Newcastle University after the project for further analysis beyond the completion date of the trial and for wider publication.

All data shared and used for further analysis and the dissemination of learning will be fully anonymised to ensure individual participants cannot be identified.

10. Your rights

The Data Protection Act 1998 gives you the right to access your personal data. Your right of access can be exercised in accordance with that Act.

Any access request may be subject to a fee (currently not exceeding £10) to meet the costs in providing you with details of the personal data that is held about you.

To request access to your personal data, please submit a request in writing to the following address:

Stephane Lee-Favier
GenGame Ltd
The Techno Center
Coventry University Technology Park
Puma Way
CV1 2TT

11. Updates

If we decide to change this Privacy Policy, we will post the updated Privacy Policy on the following website www.npg-ace.com so that you are always aware of what personal information is collected and how it is used in connection with the ACE project. The updated Privacy Policy will take effect as soon as it is posted on this website.

This Privacy Policy was last updated on 14 September 2015.



Together we can create a smarter powergrid.
Be energy smart.