



GREENROCK ENERGY

CRM System

GDPR COMPLIANCE POLICY

CONFIDENTIAL

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11 Dunkirk Business Park, Frome Road, Southwick, Trowbridge, Wiltshire. BA14 9NL
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(GreenRock Energy is a trading name of Bennett Associates Consulting Limited).



1. Introduction and Scope

This policy sets out how Greenrock Energy collects, stores, processes, and protects personal data within its Customer Relationship Management (CRM) system, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The CRM system is a web-based application hosted at crm.greenrockenergy.co.uk, used to manage properties, jobs, clients, contacts, diary bookings, and energy assessment work. It is accessed by Greenrock Energy staff and authorised contractors.

This policy applies to all personal data processed through the CRM system, regardless of how it was collected or entered.

2. Data Controller Details

The data controller for all personal data processed within the CRM system is:

Greenrock Energy

11 Dunkirk Business Park, Southwick, Trowbridge, BA14 9NL

Data protection queries: jbennett@greenrockenergy.co.uk

Data Protection Lead: Jaie Bennett

As data controller, Greenrock Energy determines the purposes and means of processing personal data within the CRM system and is responsible for ensuring compliance with the UK GDPR.

3. Data Processor Details

The CRM system is hosted by a third-party data processor:

Hosting Heroes (The Hosting Heroes Ltd)

Registered Office: Fifth Floor, 401 Faraday House, Faraday Street, Warrington, Cheshire, WA3 6GA

Company Number: 06504860

Support: support@thehostingheroes.com

Hosting Heroes provides web hosting services on a CloudLinux/cPanel-based shared hosting platform (PHP 8.4, MySQL) from UK data centres. They process personal data only on behalf of Greenrock Energy and in accordance with documented instructions.

A Data Processing Agreement (DPA) is available from Hosting Heroes and should be executed to formalise the data processing arrangement under Article 28 of the UK GDPR.

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3.1 Sub-processors

Hosting Heroes utilises the following sub-processors in the delivery of their services:

Sub-processor	Purpose
Acronis	Encrypted backup storage
MailChannels	Email delivery
Domain registrars	Domain name registration and management

Full details of sub-processors are available in the Hosting Heroes privacy policy at thehostingheroes.com/company/privacy-policy/

4. Categories of Data Subjects

The CRM system processes personal data relating to the following categories of individuals:

Category	Description
Staff / Employees	Current and former Greenrock Energy employees and contractors who access the CRM system
Clients	Organisations that commission energy assessment work, including their business contact details
Contacts	Named individuals at client organisations, managing agents, or other parties involved in assessment work
Property Occupiers	Individuals or businesses occupying properties where assessments are conducted
Property Owners	Individuals or organisations that own properties in the system, linked via client records
EPC Assessors	Energy assessors whose details are recorded from EPC certificate data retrieved from the Government register

5. Categories of Personal Data Stored

The following table provides a comprehensive inventory of personal data stored within the CRM database (bennetta_GreenrockDB):

Database Table	Personal Data Fields	Data Subjects
Staff_Tbl	First name, middle name, last name, initials, date of birth,	Staff / Employees

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	home address, postcode, mobile number, home number, email (x2), password (bcrypt hashed), employment status	
Client_Tbl	Organisation name, address, city, postcode, phone numbers (x3), email addresses (x2)	Clients
Contacts_Tbl	Full name, given name, family name, company, landline, mobile, email, address, postcode, job title/position, free-text notes	Contacts
Diary_Tbl	Occupier name, primary contact name/phone/email, access instructions, health & safety notes, assessor names (x3)	Occupiers, Contacts, Staff
Property_Occupiers_Tbl	Business/occupant name, phone number, notes	Property Occupiers
Property_Owners_Tbl	Linked to Client_Tbl, ownership history dates, notes	Property Owners
Job_Tbl	Occupier name, assessor name/number, phone, email, employer name/address, site notes (may contain personal data)	Occupiers, EPC Assessors
Audit_Log_Tbl	Staff initials, IP address, browser user agent, old/new field values (may include personal data), change timestamps. Sensitive fields encrypted with AES-256.	Staff (as actors), all subjects (as data)
Property_Tbl	Free-text property notes (may contain contact names, emails)	Various
Audit_Tbl (legacy)	Historical job data including occupier names, addresses, assessor names, site notes with contact details	Occupiers, Assessors, Staff

Note on free-text fields:

Several tables contain free-text note fields (Job_Notes, Property_Notes, Site_Notes, Access_Instructions) which may contain personal data entered by staff. These fields are included in the scope of any data subject access request.

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6. Lawful Basis for Processing

Greenrock Energy processes personal data within the CRM system under the following lawful bases:

Lawful Basis	Application	Data Concerned
Contractual Necessity (Art. 6(1)(b))	Processing necessary for the performance of contracts with clients for energy assessment services	Client, contact, property, and job data
Legitimate Interests (Art. 6(1)(f))	Managing energy assessment operations, scheduling diary bookings, maintaining property records, and ensuring service quality	All categories of personal data
Legal Obligation (Art. 6(1)(c))	Compliance with EPC regulatory requirements, energy assessment record-keeping obligations	EPC assessor data, certificate records
Consent (Art. 6(1)(a))	Staff consent to storage of personal contact details for employment/contractor purposes	Staff personal data (DOB, home address, personal contact numbers)

7. Data Retention Policy

Personal data shall not be retained for longer than is necessary for the purposes for which it is processed. The following retention periods apply:

Data Category	Retention Period	Basis
Active staff records	Duration of employment + 6 years	Employment law requirements
Former staff records	6 years after leaving	Limitation Act 1980
Client/contact records	Duration of relationship + 6 years	Contractual limitation period
Job/assessment records	10 years from assessment date	EPC validity period + margin
Diary bookings	3 years from booking date	Operational reference
Audit logs	7 years	Regulatory compliance
Property records	Duration of active use + 6 years	Contractual/regulatory

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These retention periods will be reviewed annually. Data that has exceeded its retention period will be identified and securely deleted or anonymised as part of the annual review process.

8. Data Subject Rights

Under the UK GDPR, data subjects have the following rights in relation to their personal data. Greenrock Energy will respond to all valid requests within one calendar month.

- Right of Access (Art. 15) — Individuals may request a copy of all personal data held about them.
- Right to Rectification (Art. 16) — Individuals may request correction of inaccurate or incomplete personal data.
- Right to Erasure (Art. 17) — Individuals may request deletion of their personal data where there is no compelling reason for continued processing.
- Right to Restriction (Art. 18) — Individuals may request that processing of their data be restricted in certain circumstances.
- Right to Data Portability (Art. 20) — Individuals may request their data in a structured, commonly used format.
- Right to Object (Art. 21) — Individuals may object to processing based on legitimate interests.

Handling requests:

All data subject requests should be directed to:

Email: jbennett@greenrockenergy.co.uk

Post: Greenrock Energy, 11 Dunkirk Business Park, Southwick, Trowbridge, BA14 9NL

Upon receipt of a request, the identity of the requester must be verified before any data is disclosed. The CRM audit trail can be used to identify all records relating to a data subject across all tables.

9. Data Security Measures

Greenrock Energy implements appropriate technical and organisational measures to ensure the security of personal data processed within the CRM system, in accordance with Article 32 of the UK GDPR. These measures are documented in full in the separate Security Measures Document (v2.0, May 2026) and Cryptography Policy (v1.0, May 2026).

Key measures include:

- Mandatory two-factor authentication (TOTP MFA) for all users
- Enforced password complexity (minimum 12 characters with uppercase, lowercase, numeric, and special characters)

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- Bcrypt password hashing with automatic salting
- TLS 1.2+ encryption for all data in transit (HTTPS enforced via 301 redirect)
- AES-256-CBC encryption for sensitive audit data at rest
- Full disk encryption at the hosting data centre (ISO 27001 and PCI-DSS accredited)
- Daily encrypted backups with 14-day retention
- Imunify360 firewall, ModSecurity WAF, and enterprise-grade DDoS protection
- Session timeout (30 minutes) and single-session enforcement
- Role-based access controls (10 levels)
- IP-restricted access for Head Office file operations
- Parameterised database queries (SQL injection prevention)
- Output escaping (XSS prevention)
- Comprehensive field-level audit logging with AES-256 encryption
- Endpoint protection: Windows 11 with Device Encryption/BitLocker and Windows Security (Defender)

10. Data Breach Procedures

In the event of a personal data breach, Greenrock Energy will follow the procedures set out below.

1. Assessment (within 24 hours)

- Identify the nature and scope of the breach
- Determine what personal data has been affected
- Assess the risk to affected individuals
- Take immediate steps to contain the breach

2. Notification to the ICO (within 72 hours)

Where the breach is likely to result in a risk to the rights and freedoms of individuals, Greenrock Energy will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, as required by Article 33 of the UK GDPR.

3. Notification to Data Subjects

Where the breach is likely to result in a high risk to the rights and freedoms of individuals, affected data subjects will be notified without undue delay, as required by Article 34.

Breach Response Contacts:

Role	Name	Contact
Primary Breach Contact	Jaie Bennett	jbennett@greenrockenergy.co.uk
ICO Notification Authority	Jaie Bennett	jbennett@greenrockenergy.co.uk
Hosting Provider Contact	Hosting Heroes Support	support@thehostingheroes.com

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All breaches, whether notifiable or not, will be documented in a breach register maintained by the Data Protection Lead. The register will record the nature of the breach, data affected, effects, and remedial actions taken.

11. Data Processing Agreement

Under Article 28 of the UK GDPR, Greenrock Energy is required to have a written Data Processing Agreement (DPA) in place with any third party that processes personal data on its behalf.

Hosting Heroes (The Hosting Heroes Ltd)

As the hosting provider for the CRM system, Hosting Heroes acts as a data processor. A DPA covering the following areas is available from Hosting Heroes:

- Subject matter and duration of processing
- Nature and purpose of processing
- Types of personal data and categories of data subjects
- Obligations and rights of the controller
- Security measures implemented by the processor
- Sub-processor arrangements (Acronis, MailChannels)
- Data breach notification obligations
- Data deletion/return on termination
- The DPA should be formally executed and retained alongside this policy.

12. International Data Transfers

Personal data processed within the CRM system is stored and processed exclusively within the United Kingdom. No personal data is transferred outside the UK.

Hosted CRM Database:

Hosted by Hosting Heroes on servers located in UK data centres, accredited to ISO 27001 and PCI-DSS standards. Encrypted backups are stored across geographically diverse UK locations by Acronis.

Head Office File Server:

A WD My Cloud PR4100 NAS located on-premises at 11 Dunkirk Business Park, Southwick, Trowbridge, BA14 9NL. Access is restricted to the local network only; no remote access is enabled. All data remains within the UK.

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13. Review and Updates

This policy will be reviewed at least annually, or sooner if there are significant changes to the CRM system, data processing activities, or applicable legislation.

Version	Date	Author	Changes
1.0	15 May 2026	Mark Brebner	Initial version
2.0	16 May 2026	Mark	Completed: data controller/processor details, breach procedures, hosting infrastructure confirmed, security measures updated, sub-processors documented, data transfers confirmed UK-only

Name: Jason Lloyd

Position: Director

Signature: *JLloyd*

Date: 18/05/2026