

**GENERAL DATA PROTECTION
REGULATION (GDPR) IN THE CONTEXT
OF EEDAPP** **27 SEPTEMBER 2019 - VENICE**



WHAT IS GDPR

The General Data Protection Regulation (EU) 2016/679, commonly known as GDPR, applies from 25 May 2018 and regulates **the processing** by a company or an organisation **of personal data** related to **individuals in the EU**.

Scope of application:

- all organisations established in the EU (irrespective if the data processing takes place in or not in the EU)
- organisations which are not established in the EU as long as the data processing activities are with regard to EU individuals

KEY GDPR DEFINITIONS

- **“personal data”** is defined as any information that would directly or indirectly lead to the identification of a natural person (i.e. ‘data subject’)
- **“processing”** is defined widely and includes any operation which is performed on personal data such as e.g. 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
- **“controller”** is defined as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purpose and means of the processing of the personal data
- **“processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Examples of **personal data**:

- a name and surname
- a home address
- an email address such as name.surname@company.com
- an identification card number

Examples of **data not considered to be personal data**:

- a company registration number;
- an email address such as info@company.com
- anonymised data

The GDPR applies to both the controller and the processor with a limited number of provisions directly applicable to the data processors.

GDPR PRINCIPLES IN THE CONTEXT OF EEDAPP

Lawfulness, Fairness and Transparency	The data processing should be based on valid grounds ('lawful basis'). It must be used in a way that is fair and should be clearly communicated to the data subject how the personal data will be used
Purpose Limitation	The data processing should be limited to the following purposes: to track the performance of energy efficient mortgages, to be used as a required input for risk models and mortgage affordability calculations
Data Minimisation	The proposed EeDaPP Master template (WP3 and D4.2) defines the data needs for energy efficient mortgages
Accuracy	Appropriate data quality controls should be implemented to verify the accuracy, the completeness and consistency of the information provided
Storage Limitation	It must be ensured that personal data is not kept for longer than needed, unless they are anonymised. The GDPR does not limit the storage of anonymised data.
Integrity and Confidentiality	Security measures must be in place to ensure that the data is accessed, disclosed or deleted only by those who are authorised to do so and cannot be accidentally or deliberately compromised.
Accountability	In general, the organisations need to implement policies and procedures to ensure compliance and be able to demonstrate compliance with the GDPR.

RIGHTS OF THE DATA SUBJECT



Right to be informed



Right of access to the information



Right to rectification



Right to be “forgotten”



Right to restriction of processing



Right to data portability



Right to object



Rights with regard to the automated decision and profiling

EEDAPP MASTER TEMPLATE WITH RESPECT TO GDPR PERSONAL

DATA (1) Category	Field Name	Description	Personal Data (Yes/No)
Identifier	EPC Identifier	Unique key ID of the energy performance certificate delivered	N*
Identifier	EPC Register Identifier	Unique key ID to link and identify EPC register Identifier	N*
Identifier	Property upgraded Identifier	Unique key ID to link and identify, the property including energy performance information recorded (such as EPC rating & date)	N*
Category	Field Name	Description	Personal Data (Yes/No)
Property Information	Construction Year	Indicate the year when the property was originally built (YYYY format). In the case of a conversion of a building into flats, the date of conversion should be supplied. If no data available refer to Taxonomy for inputs.	N
Property Information	Permit deliverance year	Date (year) at which the construction permit was delivered (more accurate than construction year)	N
Property Information	Energy Renovation Flag	Flag if there is a way to know that the property has undergone energy retrofits in the life cycle of the building	N
Property Information	Building Codes	precise to which building codes and thermal construction regulation the construction year apply to (NZEB or other)	N
Characteristics	Address of Property	Street address where the Property is located at, including flat / house number or name	Y
Characteristics	City of Property	City where the Property is located at	N
Characteristics	Geographic Region of Property	Province / Region where the Property is located at	N
Characteristics	Property Postcode	Postcode where the Property is located at	N*

* These fields can be personal data if reported differently (such as e.g. customer ID, or ID number, or tax number used for identifiers). Also, property postcode for remote areas may lead to identification of the borrower

EEDAPP MASTER TEMPLATE WITH RESPECT TO GDPR

Category	Field Name	Description	Personal Data (Yes/No)
Energy Performance Certificate	EPC Register	Type of the EPC register (based on BPIE 2016): <ul style="list-style-type: none"> - Government Body - Third Body - Professional Association - Mixed (Specify) 	N
Energy Performance Certificate	Energy Performance Certificate Provider Name	Enter in the legal name of the energy performance certificate provider. Where a Legal Entity Identifier (LEI) is available in the Global Legal Entity Foundation (GLEIF) database, the name entered shall match the name associated with the LEI.	N
Energy Performance Certificate	EPC Rating Format	Type of Rating: <ul style="list-style-type: none"> - Energy Label - Continuous Scale 	N
Energy Performance Certificate	EPC Software	The method used in the assessment of the energy performance certificate of the collateral at the time of origination (based on BPIE, 2016): <ul style="list-style-type: none"> - Theoretical public (EPC rating based on a software tool elaborated by the public authorities) - Theoretical private (EPC rating based on a commercial software tool) - Theoretical Mixed (EPC rating based on both public and commercial software) - On-site (EPC rating based on inspection and on-site visit) 	N
Energy Performance Certificate	Energy Performance Certificate Value	The energy performance certificate value of the collateral at the time of origination: <ul style="list-style-type: none"> A (EPCA) B (EPCB) C (EPCC) D (EPCD) E (EPCE) F (EPCF) G (EPCG) Other (OTHR) 	N

EEDAPP MASTER TEMPLATE WITH RESPECT TO GDPR

Category	Field Name	Description	Personal Data (Yes/No)
Energy Performance Certificate	EPC Score	Score between 0 and 100	N
Energy Performance Certificate	EPC Qant. Energy	Final energy Consumption estimate (in kWh/m ² /year)	N
Energy Performance Certificate	EPC Qant. Carbon	Estimate Carbon Emission as per the data delivered by the Energy Performance Certificate	N
Energy Performance Certificate	Issue Date	Date of deliverance of the EPC	N
Energy Performance Certificate	Term Date	Date of end of validity of the EPC (depending on the length of validity)	N
Energy Efficiency financing schemes	Benefitted from EE financing scheme associated to the loan	Yes/No - indication if the loan benefitted from a guarantee and/or subsidy granted by a public institution / governmental agency (example - "zero interest rate" loan)	N
Energy Efficiency financing schemes	Scheme name	Name and details of the financing scheme (regional/National Level; third parties involved ect..)	N
Energy Efficiency financing schemes	Amount Received	amount received in monetary terms or interest margin or level of guarantee granted	N
Energy Efficiency financing schemes	EE Incentive scheme received by the borrower	Yes/no - if the borrower benefitted from a fiscal or lump sump subsidies associated with the energy improvement of its property	N
Energy Efficiency financing schemes	Scheme name	details of the scheme	N
Energy Efficiency financing schemes	Amount Received	amount received (in tax rebates or subsidies) in monetary terms	N

EEDAPP MASTER TEMPLATE CONSULTATION FEEDBACK

SUMMARY

	Data collected and available	Data collected but not loaded into the originator's data management and reporting system	Data not collected because it is not required by the lending or underwriting criteria	Data not collected because of data access and confidentiality issues (e.g. GDPR)
IDENTIFIERS	15%	na	na	na
Construction year	50%	20%	30%	0%
Renovation flag	20%	5%	5%	5%
Address	40%	10%	0%	0%
EPC Register	0%	0%	0%	0%
EPC	35%	10%	5%	40%
EE Public Schemes	15%	15%	15%	0%

National Hub	Internal/External	Public/Private	Regional/Centralised	Accessible/Not Accessible
Spain & Portugal	External & Internal	Private & Public	Centralised	Partly Accessible
Poland	External	Government body	Centralised	Accessible
Finland	External	Government body (ARA)	Centralised	Partly accessible (2,5% - GDPR Issues)
Belgium	External	Government body	Regionalised (Flanders/Walonie/BXL)	Not accessible (GDPR Issues)
Italy	External	Government body	Regionalised	Partly accessible (GDPR issues)
France	Internal/External	Gouvernement body (SFGAS/Ademe)	Centralised	Partly Accessible
UK	External	Government body (EPBD R)	Regionalised (ENG,WAL,NI,SCOT)	Partly Accessible
Germany	Internal/External (EPC register for residential only)	Public/private	Centralised	Partly Accessible

ANNEX

WHAT DO ORGANISATIONS NEED TO DO TO BE GDPR COMPLIANT

adopt a 'data protection by design and by default' approach

appoint a Data Protection Officer (DPO) where necessary

implement processes and procedures including any data protection policies

maintain documentation of the processing activities

implement security measures (such as 'pseudonymisation' or encryption)

record and, where necessary, report personal data breaches

conduct data protection impact assessments (DPIA) for processing of personal data likely to result in high risk to data subjects' interests

adhere to relevant codes of conduct and sign up to certification schemes

THANK YOU//CONTACT US

EUROPEAN DATAWAREHOUSE GMBH

Walther-von-Cronberg-Platz 2

60594 Frankfurt am Main

 **www.eurodw.eu**

 **enquiries@eurodw.eu**

 **+49 (0) 69 50986 9017**

This presentation (the "Presentation") has been prepared by European DataWarehouse GmbH (the "Company") and is being made available for information purposes only. The Presentation is strictly confidential and any disclosure, use, copying and circulation of this Presentation is prohibited without the consent from the Company. Information in this Presentation, including forecast financial information, should not be considered as advice or a recommendation to investors or potential investors in relation to holding, purchasing or selling securities or other financial products or instruments and does not take into account your particular investment objectives, financial situation or needs. No representation, warranty or undertaking, express or implied, is made as to the accuracy, completeness or appropriateness of the information and opinions contained in this Presentation. Under no circumstances shall the Company have any liability for any loss or damage that may arise from the use of this Presentation or the information or opinions contained herein. Certain of the information contained herein May include forward-looking statements relating to the business, financial performance and results of the Company and/or the industry in which it operates. Forward-looking statements concern future circumstances and results and other statements that are not historical facts, sometimes identified by the words "believes", "expects", "predicts", "intends", "projects", "plans", "estimates", "aims", "foresees", "anticipates", "targets", "May", "will", "should" and similar expression. The forward-looking looking statements, contained in this Presentation, including assumptions, opinions and views of the Company or cited from third party sources are solely opinions and forecasts which are uncertain and subject to risks.