

# BD4OPEM P2P Trading Service

## Privacy policy

The BD4OPEM Project is a European Project with GRANT AGREEMENT Number 872525

### 1. Introduction

The initial visit to the Internet Portal of BD4OPEM P2P Trading Service is carried out anonymously. In order to access any of the affiliated BD4OPEM services, such as this P2P Trading Service that have specific management or procedures, users must first have a registered organization member identity and contract in the BD4OPEM platform. The P2P Trading Service uses the registered organization identity and contract information (personal data) for the provision of the requested P2P Trading Service. These data will be incorporated into the corresponding treatment activities of the **PILOTING PARTNER ORGANIZATION** and will be treated with the specific purpose of each treatment, in accordance, mainly, with the regulation established by Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and repealing Directive 95/46 / CE (General Protection Regulation of data).

### 2. Why and how do we process your personal data?

The P2P Trading Service enables Citizen Energy Communities (CECs), made up of consumer and prosumer households, to setup their own P2P Trading Service to trade energy in an automatic and trusted way between their members that make up the CEC. Each CEC will be managed by a CEC Administrator who will represent the CEC organization and all its member households.

The P2P Trading Service website does not directly manage the setting up of CECs, their identities, or contracts, rather this is handled by the BD4OPEM Marketplace.

### 3. On what legal ground(s) do we process your personal data?

The service relies on the BD4OPEM marketplace to provide the legal basis of the service with all concerned parties (CEC Administrator, Service Provider & smart meter Data Provider) agreeing/consenting to the terms and conditions of the contract. The P2P Trading Service executes this contract for the CEC. The CEC Administrator would be a recognised retailer who has legal responsibilities for their smart meter household customers.

*NOTE: During the BD4OPEM research project, the **PILOTING PARTNER ORGANIZATION** will act as the Data Controller for the P2P Trading Service and for the purposes of the piloting also as the CEC Administrator as it will pilot with its own infrastructure smart meters.*

### 4. Which personal data do we collect and further process?

#### Organization member data:

The service receives verified organisation member identity data (personal data) in a token so to validate that a physical person is authorised to represent their organization in the setting up and management of the P2P Trading Service. This enables the organisation member to provision and manage P2P energy trading communities based on end user's personal smart meter identities, belonging to the service members that they represent.

The organization member once verified is not retained by the service.

#### CEC Member smart meter data:

The provisioning of the service is performed by querying the service contract from the BD4OPEM Marketplace and obtains the CEC member smart meters (personal data) to start the service.

The P2P Trading Service makes use of Blockchain technology through smart contracts to provide an automatic trading algorithm between its prosumer and consumer members. The P2P Trading algorithm works by the service querying the BD4OPEM platform daily for the previous day's smart meter records, of its members which it has obtained from the Data Provider as previously agreed in the contract between the CEC Administrator (Data User) and the Data Provider. The output of the smart contract is the traded energy for each hour, in a day day between its members, which is recorded in a monthly billing record.

All personal smart meter data is handled as private data in the smart contract and therefore stored off-chain. No personal data (smart meter identities) are stored on-chain and therefore can be deleted upon request. The deletion of traded data will not be immediate but will take place once the current billing month has concluded.

#### Cookie data:

No cookies are generated by the P2P Trading Service, however it accesses the cookie produced by the BD4OPEM marketplace as part of a Single Sign On authenticated access for organization members to the P2P Trading Service.

### **5. How long do we keep your personal data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

Data retention for billing customers is subject to national regulation: XYZ

### **6. How do we protect and safeguard your personal data?**

In order to protect personal data handled by the P2P Trading Service, both technical and organisational measures are in place. Technical measures include security of data in transit, distributed/decentralized data storage, alteration of data and unauthorised access.

Organisational measures restrict access to the personal data so that only data base operations would have access for maintenance purposes.

### **7. Who has access to your personal data and to whom is it disclosed?**

Entities with access to personal data on the platform are:

- CEC Administrators to receive the trading results for managing billing of their end customers
- Data Provider Organizations who in this case are Distribution System Operators (DSOs) who use the results for billing reconciliation with retailers

### **8. What are your rights and how can you exercise them?**

If you have any query or concern about this privacy notice or processing of your personal data, please contact us here:

P2P Pilot partner email or web page or telephone