

Customer Privacy Notice

Effective Date

This Privacy Notice is effective from 25th May 2018.

Who we are

GnERGY Ltd is a company registered in the United Kingdom (registration number 06993060) with a registered office at 119 Wren Way, Farnborough, Hampshire, GU14 8TA and licensed as an energy supplier under the Gas Act of 1986 and the Electricity Act of 1989 and will be what is known as the 'Controller' of the personal data you provide to us.

We are registered as a Controller with the Information Commissioner's Office. Our registration number is ZA016437.

Our Office Manager can be contacted at privacy@gnergyuk.com.

What we need

We process personal information about you when you provide it to us, in a number of ways. This includes:

- when you use our website, including customer portal;
- from your smart meter;
- when you contact us directly by phone or by email;
- when you write to us;
- when you engage with our door-to-door sales team to sign up to GnERGY;
- from third parties, such as brokers, electricity distribution companies, gas shipping companies, your previous energy supplier, meter operators, data collectors, debt collection agencies, the Parliamentary Ombudsman; and
- from landlords or letting agents, when you move in or out of a property that we supply energy to.

We only process basic personal data about you. This includes:

- your name, address, email address and telephone number;
- the names and contact details of any additional contacts on your account;
- your payment information, which includes bank name, account number and sort code for direct debit mandates or your other payment methods; and
- for some customers, details of their eligibility criteria for inclusion on our Priority Service Register (PSR), which is a requirement of our energy supply licences.

Why we need it

We need to know your basic personal data in order to provide you with energy supply services in accordance with the contract between us and the terms of our supply licence. We will not collect any personal data from you we do not need in order to provide and oversee

this service to you. Our legal basis for processing your personal data is the contractual obligation between us to perform the contracted services.

We would like to send you by email information about our core products and services which may be of interest to you. You have a right at any time to stop us from contacting you for marketing purposes at any time. If you no longer wish to be contacted for marketing purposes, you can opt out by emailing privacy@gnergyuk.com.

What we do with it

All the personal data we process is processed by our own staff in the UK. However, for the purposes of IT hosting and maintenance this information is located on servers within the European Union. No 3rd parties have access to your personal data unless the law allows them to do so.

The third parties who will have access to some of your personal data will only have access to the specific data they need to fulfil their part of the contract between us. These includes:

- organisations which provide us with customer management services;
- organisations which manage payments and direct debit instructions on our behalf;
- organisations that manage our meter estate;
- energy distribution companies;
- revenue protection and debt collection services - personal data will be provided to third parties to enable debt recovery. There may be legal consequences for you if an alleged fraud or theft is detected; and
- the Parliamentary Ombudsman.

Where we engage third parties to process your personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Your data will not be transferred to countries outside the European Economic Area (EEA).

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. If we are reliant upon your consent for any new processing, we will seek your consent before we begin that new processing.

How long we keep it

We are required not to keep personal data for longer than we have a valid legal basis for doing so and will securely delete the data when it can be removed. We will keep your personal data for a period of 3 years to fulfil our licence obligations and enable us to deal with any disputes after your energy supply contract comes to an end.

Security

We take data security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology.

We have a data protection regime in place to oversee the effective and secure processing of your personal data. More information on this framework can be found in our Data Protection Policy on our website at <https://www.gnergy.co.uk/privacy-and-cookies/>.

What are your rights?

As a Data Subject, unless subject to an exemption, you have the following rights with respect to your personal data:

- the right to request a copy of your personal data which we hold about you;
- the right to request that we correct any personal data if it is found to be inaccurate or out of date;
- the right to request your personal data is erased where it is no longer necessary for us to retain such data;
- where we rely upon consent as a legal basis for processing, the right to withdraw your consent to the processing at any time;
- where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means, the right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability).
- the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics, the right to object to the processing of your personal data.
- the right to lodge a complaint with the Information Commissioners Office.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Office Manager at privacy@gnergyuk.com who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office, who can be contacted at:

<https://ico.org.uk/concerns/>

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow



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Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.