

UK GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Energy Oasis and EO Green Utilities ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use [Privacy Policy – EO Green Utilities](#), [Privacy Policy - Energy Oasis](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the UK General Data Protection Regulation (the "UK GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person.

Data protection legislation – Means the data protection legislation enforce in the UK from time to time and includes the Data Protection 2018 (as amended) and the UK General Data Protection Regulation (UK GDPR).

Categories of data: Personal data and special categories of personal data

Personal data - The UK GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of UK GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The UK GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of UK GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as 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.

Third party - Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Energy Oasis and EO Green Utilities are the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Belvedere House, Victoria Avenue, Harrogate HG1 1EL. For all data matters contact our office on 01423 528239.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To maintain our own accounts and records
- To inform individuals of news, events or activities
- You may give us information about you by filling in forms on our sites www.eogreenutilities.co.uk and www.energyoasis.org.uk or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service and when you report a problem with our site.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Providing you with a quote

When you request a quote from us via our website, or by email, or telephone, we'll need to collect all the following information about your business to allow us to provide that quote:

- First and last name
- Business name
- Postcode of your business
- Email address
- Telephone number
- Type of energy quote
- Meter point administration number (MPAN)
- Meter point reference number (MPRN)
- How much electricity and/or gas you use - you can provide this in pounds or kilowatts per year/6-monthly/quarterly/monthly
- What time of day it's best to call you

Onboarding you as a business customer

If you join us as a customer, we'll need to collect the following additional information about you.

This will allow us to complete your onboarding process (including verifying your identity and carrying out a credit check) and to provide the products or services you've requested from us:

- Personal details – title, name, phone number, email address, time at address
- Job title (where you're representing a limited company)
- Date of birth (of sole traders and partners) for credit checking (see below)
- Domestic address(es) of sole traders and partners – for credit checking (see below)
- Contact and billing address(es)
- Business bank account details

Managing your account

While you're our customer, we'll collect the following information to allow us to manage your account. This information also means we can analyse and monitor your energy consumption for billing purposes and continue to provide the products or services you've requested from us:

- Information about the operation of your account
- Usage of our websites and online portals

Other uses of your information

We may also use your personal information in the following ways:

- To allow you to access your information directly through our CRM system
- To provide you with information about other products and services that we offer, or which we feel may be of interest to you, where permitted by law including via our social media and digital campaigns
- To provide you with the opportunity to purchase other products and services offered by companies that we've carefully selected as partners
- To create statistics and analyse customer profiles to develop and improve our products and services
- To carry out testing of our IT systems and to develop and improve our systems
- For debt collection purposes
- To invite you to let us re-quote for your energy supply

CHANGE OF PURPOSE

We'll only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we'll usually notify you and explain the legal basis that allows us to do so.

5. Sharing your personal data

We may share your personal information with the third parties set out below for the purposes described:

- With energy suppliers we're seeking quotes from, and with whom you'll ultimately enter into a contract
- If you've consented, we'll share your personal information with third parties who may be able to offer products and services different to our own
- We may share your information with third parties so we can enhance the data we already hold, and to make sure we have your most up to date contact information
- Service providers such as those who provide IT and system administration services, and those that support the delivery of our marketing materials to you (marketing agencies), or provide us with market research services
- If we're under a duty to disclose or share your personal information to comply with any legal obligation

- In the event that we transfer, sell or buy any business or assets, in which case we may (where relevant) disclose your personal information to the prospective seller or buyer
- If we, or substantially all of our assets, are acquired by a third party, in which case personal information we hold will be one of the transferred assets
- To protect the rights, property or safety of us, our customers and others. This includes exchanging information with other organisations (e.g. credit reference, fraud and theft prevention agencies) for the purposes of reducing credit risk, fraud and energy theft

We require all service providers and partners that we share your personal information with to respect the privacy and security of your personal information and to treat it in accordance with the law. We don't allow our third-party service providers to use your personal information for their own purposes, and only permit them to process your personal information for specified purposes and in accordance with our instructions.

6. How long do we keep your personal data?

We'll only keep your personal information for as long as necessary to fulfil the relevant purpose(s) we collected it for, as set out above in this notice, and for as long as we're required to keep it for legal purposes.

To determine the appropriate retention period for personal information, we consider:

- The amount, nature, and sensitivity of the personal information
- The potential risk of harm from unauthorised use or disclosure of your personal information
- The purposes for which we process your personal information and whether we can achieve those purposes through other means
- The applicable legal requirements

For example, by law and for tax purposes, we must keep basic information about our customers (including contact, identity, financial and transactional data) for six years after they cease being a customer.

In some circumstances:

- You can ask us to delete your personal information (see "Your rights", below, for further details)
- We may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you

We have appropriate security measures in place to prevent your personal information from being: accidentally lost; used or accessed in an unauthorised way; altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know that information. They'll only process your personal information on our instructions, and they're subject to a duty of confidentiality.

We have procedures to deal with any suspected personal information breach and will notify you, and any applicable regulator, where appropriate.

7. Your rights and your personal data

Data protection laws provide you with the following rights where we're processing your personal information (but not in respect of information about a corporation) to request:

- **Access** to your personal information (commonly known as a "data subject access request") – enabling you to receive a copy of the personal information we hold about you and to check that we were lawfully processing it
- **Correction** of the personal information that we hold about you – enabling you to make sure we correct any incomplete or inaccurate information we hold about you
- **Erasure** of your personal information – enabling you to ask us to delete or remove personal information where there's no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you've exercised your right to object to processing (see below)
- **Restriction** of processing your personal information – enabling you to ask us to suspend the processing of personal information about you e.g. if you want us to establish its accuracy or the reason for processing it
- **A copy** of your personal information which you've provided to us – we must comply using a structured, commonly used and machine-readable format. You also have the right to transfer it, or to require us to transfer it directly, to another controller

You also have the "**right to object**" to the processing of your personal information where we're relying on a legitimate interest (or those of a third party) and there's something about your situation that means you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.

You won't have to pay a fee to access your personal information (or to exercise any of the other rights above). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively in such circumstances, we may refuse to comply with the request.

We may need to request specific information from you to help us confirm your identity and to make sure of your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to make sure that no personal information is disclosed to any person who has no right to receive it.

8. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE UK.

9. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data 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.

11. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

12. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Representative on 01423 528239.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.