

# **Privacy Information Notice**



This Privacy Notice applies to personal information we hold about individuals, sole traders and partnerships. It does not apply to information we hold about companies and other organisations.

E is a trading name of E (Gas and Electricity) Ltd (Company number 08520118). 'We' is E (Gas and Electricity) Ltd. We believe it is important to protect your privacy and we are committed to the operation of fair process in relation to the collection and use of personal information.

E (Gas and Electricity) Ltd is the data controller in respect of personal information used in connection with the supply of services and this Privacy Notice explains how we may collect and use personal information about you. It also explains some of the security measures we will take to protect your privacy and tells you what we will not do.

This Privacy Notice is in addition to our Terms and Conditions which can be found at www.e.org.

## 1 What personal information we may collect and how we use it

- 1.1 We, or third parties acting on our behalf collect your personal information if we visit your home or when you use our website, contact us by phone, email, post, in person or via companies that introduce you to us.
  - We will ask for personal information as part of our application process.
  - We will collect information from your Smart Meter.
  - We may collect information from your previous supplier as part of the switching process.
  - We may collect information from third parties such as; credit reference agencies, the owner of the property (or their representatives) and the local authority in order to confirm your identity.
  - We may collect your personal information to comply with our legal and licence obligations. This could for example be to assess eligibility against government schemes such as the Warm Home Discount (WHD) or Energy Company Obligation (ECO).
- 1.2 We will use this information to identify you, provide the services as set out in our Terms and Conditions, manage your account with us, resolve any issues with your account or your supply, monitor and review our services with a view to making any necessary improvements and to allow us to comply with the terms of our licence.
- 1.3 We are allowed to use personal information only where we have a reason to do so, the following are the main reasons that we are permitted to use your personal information: -
  - To perform a public task that is in the interest of the public
  - Where you have provided us with your consent to use your personal information for a purpose.
  - To manage our contractual obligations to you
  - To meet our legal obligations
  - To protect the vital interests of you and anyone in your household
  - When it is in E's legitimate interests.
- 1.4 We may share your information with:
  - our third party subcontractors who provide our service to you;
  - your previous supplier or if switching, new supplier;

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- third party agencies such as; gas or electricity network operators, Citizens Advice Bureau, local councils and health agencies who can manage any welfare concerns we may have;
- a third party you nominate to represent you (where you have previously informed us that a third party is acting on your behalf);
- Relevant industry partners including the relevant fraud prevention agencies who may support the detection and prevention of fraud and energy theft or government departments and agencies to comply with regulation and relevant schemes.
- Industry and regulated bodies or Government departments such as the Department of Work and Pensions to validate eligibility against licence obligations or legislation.

- 1.5 With your consent, we will also use the information we collect about you (or any other member of your household) to aid us in identifying those individuals who may require additional assistance as a vulnerable customer.
- **I.6** Our legitimate interests:

We may also use your personal information based on our legitimate interests. A legitimate interest is when we have a business or commercial reason to use your information (for instance to add value to our services or to improve our customer service). But even then, it must not unfairly go against what is right and best for you. To achieve this, we will ensure that the collection and processing of your personal information: -

- is kept to a minimum with regards to the amount of data collected and the extent of any processing;
- will not be overly intrusive to you; and
- will be proportionate in order to meet our legitimate interests, as described below.
- 1.7 Our legitimate interests are:
  - To market products and services to you.
  - Alert you to important information about your tariff and to help you manage your energy account more effectively.
  - We may share your health data with electricity and gas transmission operators for the sole purpose of ensuring your wellbeing is prioritised during a power cut.
  - Develop our products and our service to better meet customer needs, this could include from when you visit our app or when you contact our call centre.
  - Consider all aspects of the personal data we hold about you, to help us understand how you use our products and what products may suit you.
  - Use credit reference agencies to help prevent over indebtedness and to assess your ability to pay us by credit
  - Report fraudulent activity to credit reference agencies, fraud prevention agencies, Police and / or financial regulators.

## 2 Keeping in touch with you

- 2.1 When we first collect personal information from you, or when you take out a new service or product from us, we will give you the opportunity to tell us if you do not want to receive information from us about other services or products. You can usually do this by ticking a box on an application form or contract. You can change your preferences at any time by contacting our Customer Service Team.
- 2.2 We may then use your contact details to send you information by letter, email, text message or phone about your account. We may also contact you with additional information that is relevant to your account with us. If you would like to change the way you receive the additional account information or you would like to add or remove this service, please contact our Customer Service Team. We will contact you by electronic means unless you have advised us this is not appropriate.
- 2.3 We may also use your information to let you know about other relevant services that we have agreed should be made available to you however, only in accordance with the terms of this Privacy Notice and we will only contact you with information about our services where you have agreed to receive such information from us.

#### 3 How we look after your personal information

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- 3.1 The Information we hold about you is stored on our secure servers which are protected from external access.
- 3.2 Our Employees access our systems using individual password protected schemes, which limits access to your data to those who need it in order to provide our services to you.
- 3.3 We, or a third party who we share personal information with may host, store and handle this information outside of the European Economic Area (EEA).
- 3.4 We will only allow this to happen if adequate safeguards are in place to ensure the country offers the same level of protection as the EEA.

## 4 Your rights over your personal information

- 4.1 Under Data Protection law you have the right to protect and look after your personal information.
- 4.2 You have the right to ask us to provide you with a copy of any personal information we hold about you.
- **4.3** You can prevent the use of your personal information for marketing purposes by withdrawing your consent at any time. You can set your personal preferences by ticking boxes on data collection forms or speaking to our Customer Service Team. (Even if you have chosen not to receive marketing communications from us, we may still contact you to discuss your account or inform you of any changes to our Terms and Conditions).
- 4.4 You can also ask that:
  - any inaccurate information we hold about you is corrected;
  - we delete any personal information we hold about you;
  - we stop using your personal information for certain purposes;
  - we do not make decisions about you by completely automated means;
  - personal information you have given us be provided to you in a common machine readable format (or sent to a third party where this is technically feasible).
- 4.5 The rights set out above may only apply in limited circumstances as we may need to process your personal information to comply with our legal obligations. We will inform you within 1 month of you making your request.
- 4.6 If you are unhappy with the way we handle your personal information, please contact our Data Protection Manager at E,T3, Trinity Park, Bickenhill Lane, Birmingham, B37 7ES or email customer.service@e.org.We will try to address your concerns, however, if you remain dissatisfied, you also have the right to lodge a complaint with a superior authority and you can do this by contacting the Information Commissioner at: -

The Information Commissioners Office (ICO): Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF,

Telephone: 0303 123 1113 Online: - www.ICO.org.uk/concerns/

## 5 How long we will hold your personal information

- 5.1 We will keep your personal information for no longer than is necessary and only for the reason for which it was collected.
- 5.2 The length of time we will retain the information will depend on the purposes for which we use it and/or as required for us to comply with applicable laws and to establish, exercise or defend our legal rights..
- 5.3 This means that some of your personal information will be kept for a short time e.g. we will keep all call recordings for 12 months and we may keep copies of correspondence and complaints for up to three years following resolution. Other information may be kept for a longer period of time e.g. we keep details of your address for a period of up to six years after your account has been settled.

## 6 Changes to our Privacy Notice

6.1 It may be necessary for us to update our Privacy Notice from time to time. Any changes we make will be published on our website and where necessary, sent to you via post or email.

If you would like any more information, please either write to our Data Protection Manager at; E,T3, Trinity Park, Bickenhill Lane, Birmingham, B37 7ES or email us at customer.service@e.org.

	When and how we collect your information	What data will we collect?	Why will we collect this data?	How long will we usually hold this data?
	Information submitted with your application	Name, address, telephone number, email address DOB, sensitive information (for vulnerable customers), MPAN, MPRN and meter readings. We may also ask you for proof of identity.	In order to create your account and verify your identity so we can provide our services to you. We also need to comply with regulatory obligations under the terms of our licence.	For the period your account with us is active and for 6 years following its closure. In certain circumstances, it may be necessary for us to keep your data for longer, for example, if there is a dispute on your account. If you do not provide the required information, we may not be able to provide some of our services to you.
	Information collected from meter readings	We will collect daily and within day data relating to your pattern of consumption and other technical data.	This enables us to optimise our purchasing of this utility and to provide you with information to help your management of the utility.	For the period your account is active and for 6 years following its closure.
	When you contact us by phone, email or by using the 'Contact us' form on our website	Name, supply address and your contact details.	To enable us to access your account and deal with your enquiry promptly.	For the period your account with us is active and for 6 years following its closure. In certain circumstances, it may be necessary for us to keep your data for longer, for example, if there is a dispute on your account. If you do not provide the required information, we may not be able to provide some of our services to you.
	Meter registration numbers (MPAN / MPRN)	MPAN and MPRN data and other technical data specific to your Smart Meter.	This information is associated to your account so that we can manage our services to you and identify your supplier.	As long as this Smart Meter is installed, this will be associated to your account for us to retain your data.
	Personal information relating to vulnerable customers	Relevant information on the vulnerability at the property.	To aid us in supplying additional services as required.	For the period your account with us is active and for 6 years following its closure.
	Using our Prepayment or top-up online facility	Registration details, bank and payment card details.	To process the payment and credit the meter with your top-up.	For the period your account with us is active and for 6 years following its closure.
	Sensitive information relating to fraud or the theft of gas or electricity	We will record details of the theft / crime on your account record.	In order to detect and prevent crime, fraud and loss and potentially report to OFGEM and other interested parties.	For the period you account with us is active and for 6 years following its closure.

This table must be read in conjunction with entirety of the Privacy Notice

We need this personal information so we can provide our services and/or products to you. If you do not provide us with this personal information, you may not be able to access certain products and/or services; in this case, we may have to cancel a product or service you have with us but we will notify you at such time.