



CUSTOMER PRIVACY POLICY
BUDGET ENERGY
MARCH 2021

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Table of Contents

Introduction 2

Definitions and Obligations..... 2-3

Data Processing..... 4

 Purposes for Processing Data4

 Data Processing Methods4

 Data-Types Processed4

 Protected Information.....5

 Special Category (“SC”) Data5

Secure Data Measures 6

 Secure Data6

 Data Storage & Retention.....7

 Data Sharing7

Transfer of Data.....8

Data Subject – Your Rights..... 9

Marketing Communications..... 9

Privacy By Design9-10

FAQs.....10-11

Complaints Process.....11

Introduction

Budget Energy take the privacy of their customer's very seriously and are committed to keeping your personal information secure. Please read the following privacy policy in order to better understand how we process data you provide to us throughout the duration of supply.

The Data Protection Manager is responsible for ensuring compliance with the relevant Data Protection and ePrivacy Laws and Regulations and with this policy. That post is held by Hazel Byrne, email hbyrne@flogas.ie Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Manager.

The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the relevant Data Protection and ePrivacy Laws and Regulations.

The data controller is Budget Energy operating as Budget Energy Limited t/a Budget Energy is a limited company, registration number NI073739 with their address at Energy House, 30-32 Balliniska Road, Springtown Industrial Estate, L'Derry, BT48 0LY.

DEFINITIONS OF DATA PROTECTION TERMS

We have set out below some definitions contained:

Data is information which is stored electronically, on a computer or in certain paper-based filing systems.

Smart Data is data off a Smart Meter.

Data subjects for the purpose of this policy include all living individuals about whom we hold personal data. All data subjects have legal rights in relation to their personal information.

Data Controllers are the people or organisations who determine the purposes for which, and the manner in which any personal data is processed. They are responsible for establishing practices and policies in line with the Acts. Budget Energy is the data controller of all personal data used in our business for our own commercial purposes.

Data Processors include any person or organisation that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition, but it could include suppliers which handle personal data on Budget Energy's behalf.

Personal Data means data relating to a living individual who is or can be identified from the data or from the data in conjunction with other information that is in or is likely to come into Budget Energy possession. Examples of Personal Data include name, address, date of birth, telephone number, email address, account number etc.

Sensitive Personal Data relates to specific categories of data such as data relating to a person's racial origin; political opinions or religious or other beliefs; physical or mental

health; sexual life; criminal convictions or the alleged commission of an offence and trade union membership. Budget Energy may collect sensitive personal data, such as limited health data in the event that specialised services are required by our customers, to meet their needs.

Processing of Personal Data means any activity that involves the use of the data. We require this information to understand your needs and provide you with a better service. In particular, we will use it for the following interests of our business:

- Internal record keeping and account management purposes (e.g. verifying your identity and fulfilling orders you place).
- Monitoring, recording and storing telephone or email communications for the purpose of internal training, to improve the quality of our customer service and in order to meet any legal and regulatory requirements.
- Improving our products and services. Contacting you by email, phone, SMS or mail for the purpose of account administration and/or processing and fulfilling orders.
- Customising our website according to your interests.
- Periodically sending you promotional mails, emails, SMS messages or social media about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- Use your information to contact you for market research purposes; and
- Contact you by phone in relation to the above.

OBLIGATIONS OF BUDGET ENERGY AS DATA CONTROLLER

Anyone processing personal data must comply with the six Data Protection principles of good practice. These provide that personal data must be:

- Be obtained and processed lawfully and fairly;
- Be collected and kept only for specified, explicit and legitimate purposes and not be used or disclosed in a manner incompatible with those purposes for which it was given to you initially
- Be protected against unauthorised access, alteration, disclosure or destruction, or unlawful processing;
- Be accurate, complete and where necessary, kept up to date;
- Be adequate, relevant and not excessive in relation to the purpose for which they were collected;
- Not be kept for longer than is necessary;

Data Processing Methods

Processing can undertake a variety of forms, examples of how we process your information for the purpose of our operations include instances such as

- Account management; this can include providing our terms and conditions, recording your meter readings, sending you invoices, administrating your payments and dealing with queries or complaints
- If you move into another property where we supply the energy, we'll link your personal details for the energy at your new address.
- Your personal information may also be used to verify your identity, to protect against fraud, and to send you relevant updates e.g. notification of your bill.

We collect most of this information as result of delivering service/supply to our customers. However, we may occasionally receive information directly from our interaction with you, when you contact us in writing, by telephone or electronically (by email, using our website or on social media).

We may also obtain information about you from external parties, such as energy suppliers as part of industry standard operations within the energy market.

Data-Types Processed

Budget Energy collects and processes information that relates to data-types as specified below:

- Name
- Address
- Email Address
- Telephone Number
- Financial [Banking] Information
- Smart meter read data
- Homeowner Status
- Medical Needs
- Special Service Requirement

In addition to the data-types outlined above there will be the occasional requirement for data collection related to instances such as:

- Information about you and your premises; this may include contact information and personal security information that you have provided to us to help us correctly identify you when you contact us
- Information about you, where you have energy infrastructure on or near your land
- Information about current and past meter readings and energy usage at your premises
- Details about current and past connection agreements and their holders at your premises
- Information about your interactions with us, including where you may have reported a fault or emergency
- Information about any special requirements you may have disclosed where continuity of energy supply is critically important

- Recordings of telephone conversations with you
- Information about work carried out at your premises in the past, or planned to take place in the future

Where applicable, it is in our legitimate interest to obtain information about you from:

- Your previous supplier that will enable us to take over your supply safely and efficiently;
- The Network Operator, in the case of when a Smart Meter is installed, so we can obtain interval data (with your pre-consent) or non-interval data.
- Your current or former landlord or previous occupier for the purposes of establishing dates of occupation and Energy usage;
- Where applicable, we can obtain/provide information from/to Network Operators about you in order to service your account fully. This would be a legal obligation on both parties involved.

Protected Information

If you have any vulnerabilities, we'll ask for your consent before we add your details to our **Priority Services Register**, which enables us to take extra steps to ensure your safety

If you would like further information on the above, please feel free to contact us as highlighted within the 'Contact Us section of this document'

Special Category ("SC") Data

Special category data relates to information that is especially sensitive and through exposure; individual rights and freedoms would be subject to adverse impact.

For example, racial or ethnic origin, political opinion and data concerning health.

Budget Energy collect health related information, only in circumstances where it is necessary.

We use the information that we collect about customers (or a member of their household) for their welfare (e.g. due to age, health, disability or financial circumstances), to:

- a) ensure the welfare of householders e.g. ensuring we do not stop your supply and can respond appropriately during a major incident or emergency situation;
- b) ensure that our communications are adapted to provide equal treatment and opportunity to all customers
- c) ensure that we support and make provisions for vulnerable customers as necessary.

If you are a customer and you would like additional information on special category data, you can learn more by reviewing our 'Appropriate Policy Document' ("APD") within our Privacy Centre.

Secure Data Measures

Secure Data

We have implemented and maintain several security controls and measures by way of ensuring the best possible protection for our customers personal information, we fully recognise the importance of personal information entrusted in us:

- We ensure the physical security of our office locations through the procurement of secure facilities
- All our employees are trained on cyber security awareness and privacy best practices
- We ensure that all our protocols relating to the processing of personal information are clearly documented and are up-to-date.
- We regularly audit our systems and business processes to ensure we the best possible defences from both a legal compliance and security technical configuration standpoint

Data Storage & Retention

At Budget Energy, we recognise the importance of Personal Data entrusted to us. We may collect and hold a range of information about you. Examples of the types of information we may hold include:

- Customer records related to communication and account interaction such as history and logs should future requirements arise for disclosing records, as such.
- We record our conversations with you, for example to prove you've agreed a contract with us, to help train our staff, or to help us give better service. We do not record cardholder data.
- Making appointments to read, inspect or change your meter to ensure we are billing you correctly and your meter installation is safe and appropriate for your needs
- Taking legal action against you if you do not pay our bills, because we're entitled to try and enforce our rights. This might be to recover money due to us, to disconnect your meter or fit a pre-payment meter
- Analysing your consumption so that we can offer you tariffs that suit your circumstances and give you tailored energy efficiency advice to help you save money
- For research and insight purposes, to enable us to provide good customer service

Information collected by us will be held for as long as it is required to fulfil the purpose it was collected and to protect our business and our rights. We are required to keep certain types of information for a specific period in order to comply with legal requirements. The length of time we keep any part of your personal information will depend on the type of information and the purpose for which it was obtained.

Budget Energy will hold customer information throughout an ongoing supply contract. Details of how long we retain data is contained in our Data Retention Policy.

If you have any questions around data retention periods, please feel free to contact our dedicated privacy team.

Data Security

We will process all personal data we hold in accordance with our Data Security Policy.

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Data Sharing

We may share your personal data with, or disclose your personal data to, the following categories of third party:

- Network operators, so they can keep you informed about reconnecting your energy if there's a loss of supply or an emergency
- Agents appointed by us to facilitate our contract with you, such as Meter Operators and Data Collectors
- Organisations that supervise or distribute data between smart meters, energy suppliers and other organisations that enable suppliers to bill customers for energy used and customers to switch between suppliers
- Other energy suppliers, landlords or housing associations if we or another organisation suspects the property is connected to fraudulent activity
- Another supplier you want to switch to.
- Other individuals where you have authorised us to, or where they are named on your account
- Members of the Budget Energy group, including our subsidiaries, holding companies and their subsidiaries.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Market regulators
- Organisations for the detection, investigation and prevention of crime
- Commissioning and installation contractors for installations of Solar Panels

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may

disclose your personal data to the prospective seller or buyer of such business or assets.

- If Budget Energy or substantially all of its assets are acquired by a third party, in Which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Budget Energy, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Door-to-Door Sales

If you initiated your supply contract through a doorstep sales representative your information is still owned and governed by Budget Energy.

We have legally binding agreements and secure systematic protocols in place to ensure the safe transfer and record of your data.

If you have any questions in relation to data sharing or data transferring, please do contact us.

Transferring personal data out of the United Kingdom (“UK”)

We may transfer any personal data we hold outside of the UK, provided that one of the following conditions applies:

- The country to which the personal data are transferred ensures an adequate level of protection and appropriate safeguards for the data subjects' rights and freedoms.
- The data subject has given his/her consent.
- The transfer is necessary for one of the reasons set out in the relevant Data Protection Laws and Regulations, including the performance of a contract between Budget Energy and the data subject, or to protect the vital interests of the data subject.
- The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements set out above, personal data we hold may also be processed by staff operating outside the UK who work for us or for one of our suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

For all transfers outside of the UK, there may not be an adequacy decision in place to allow for this transfer to take place so we will put in place additional safeguards by way of a Standard Contractual Clause "SCC". Each 3rd party where it's applicable will enter into a SCC with us to ensure your data is protected at all times.

Data Subject – Your Rights

The relevant Data Protection Laws and Regulations affords strengthened privileges to data subjects and grants individuals specific rights they can exercise under certain conditions:

- i The right to portability
- ii The right to access information
- iii The right to rectification
- iv The right to be forgotten (erasure)
- v The right to restricting of processing
- vi The right to be informed
- vii The right to object
- viii The right not to be subject to a decision based solely on automated processing

Marketing Communications

From time to time we'd like to contact you with relevant existing and new customer promotional offers.

Information you provide or that we hold about you, may be used by Budget Energy (provided you have given us consent to do so) for marketing about our products and services, and/or products and services in which we think you would be interested for Budget Energy or any other members of the DCC group, who observe the same high levels of data protection as we do.

If you wish to opt-out you can do so anytime be emailing our dedicated privacy team at privacy@budgetenergy.co.uk, via telephone or by contacting us on social media.

Privacy By Design

Budget Energy have taken steps to adapt a privacy by design approach to projects ongoing throughout the business; working to promote privacy protection and data compliance at the kick-off stages of any of our internal projects involving data-types of relevant categories.

For example:

- When building new IT systems for storing or accessing personal data;
- Developing legislation, policy or strategies that have privacy implications;
- Embarking on a data sharing initiative; or
- Using data for new purposes.

CUSTOMER PRIVACY POLICY

Budget Energy have implemented technical and organisational measures to minimise personal data processing and as a data controller only process data to an extent that is necessary (and in line with corresponding retention plans).

Privacy by Design means building privacy into the design, operation, and management of a given system, business process, or design specification; it is based on adherence with the 7 Foundational Principles of Privacy by Design:

- i. Proactive not reactive—preventative not remedial
- ii. Lead with privacy as the default setting
- iii. Embed privacy into design
- iv. Retain full functionality (positive-sum, not zero-sum)
- v. Ensure end-to-end security
- vi. Maintain visibility and transparency
- vii. Respect user privacy

FAQ's

Here are some FAQ's that may help you with any query you may have in relation to Data Protection and the data we hold on you;

- **What do you do with my data?** The protection of your personal data is a priority for Budget Energy. We offer you a better standard of service by using your personal data for:
 - (a) Contacting you by phone, mail, SMS and email about your account with invoices, balances and other important information;
 - (b) We may contact you by mail, email, SMS or social media about products and offers which we think will be relevant to you;
- **How do you protect it?** We look after your personal information at all times by using appropriate security and technical controls. Anyone who works with us handling your data has to comply with strict standards of Data Protection and ePrivacy Laws and Regulations. All our people are trained to respect your data.
- **How long will you hold it?** Where we are using your data to send you marketing information, we will hold it for 7 years as we understand that we may not supply you with Gas during this whole time period, but you may switch to a different supplier during this time and then switch back to us. By retaining this data this will enable a very smooth switch back to Budget Energy.
- **What do you hold?** You can ask us at any time what information we hold about you; just drop us a line at the address below.
- **Who will you give it to?** We will not sell or distribute your personal information to anyone else unless we have your permission or are required by law to a person authorised to obtain data under specific legislation. If you wish for us to transfer your personal information to a third party (e.g. another service provider), we will provide personal information held by us for you to pass to that third party.
- **I don't want any more marketing.** If you do not want to receive any more marketing material from us by email, post or telephone, just contact as the details below and we will stop immediately. We will still hold your information where we are legally obliged to do so. You can also ask us to stop using your information or erase your personal information from our systems as long as we do not have to keep it for legal reasons.
- **I want to know more:** Please contact us if you would like any of the following: what information is being processed; a copy of information that is being processed; correction of information being processed; deletion of information held on you (commonly known as the

right to be forgotten); to restrict processing; to request your data be handed over to someone else; object to the processing of your information. More details about our approach to data protection are at <https://budgetenergy.co.uk/privacycentre/>

Who are you? We are Budget Energy.

- **How can I contact you?** E-mail us at privacy@budgetenergy.co.uk or contact us on 0800 012 1177 or write to us at Budget Energy, Energy House, 30-32 Balliniska Road, Springtown Industrial Estate, L'Derry, BT48 0LY. It is always good to hear from you.
- **Still not happy?** We will always try to resolve your concerns. In the unlikely event that you are still concerned, you can contact the Information Commissioner. Contact details for the Information Commissioner, as well as information on the relevant Data Protection and ePrivacy Laws and Regulations, may be found at the Information Commissioner's, may be found at the Information Commissioner's web site www.ico.org.uk

Contact/Complaints

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Budget Energy's Data Protection Manager:

Hazel Byrne at hbyrne@flogas.ie

Should you be dissatisfied with our responses, you may contact the Information Commissioners Office (ICO). Contact details for the ICO, as well as information on the relevant Data Protection and ePrivacy Laws and Regulations, may be found at the ICO's web site <https://ico.org.uk/>