

# Privacy Policy

## About us

PFP Energy Limited is a gas shipper, licenced and regulated by Ofgem and registered with Companies House under number 08994981. Its registered office is Unit 2 Edward VII Quay, Navigation Way, Preston PR2 2YF.

PFP Energy Supplies Limited is a gas and electricity supplier, licenced and regulated by Ofgem and registered with Companies House under number 09135694. Its registered office is Unit 2 Edward VII Quay, Navigation Way, Preston PR2 2YF.

This privacy policy sets out how PFP Energy Limited and PFP Energy Supplies Limited (who operate collectively under the PFP Energy brand), processes personal data collected from you or about you, which is provided to us by yourself or by third parties. PFP Energy is a data controller, registered with the Information Commissioner's Office under the number: ZA116512.

We may change this privacy policy from time to time in accordance with the changing data protection laws.

If you require any further information or you wish to make an enquiry regarding the way we process your data, you can contact us by e-mailing:

- For Domestic Customers – [customersubjectrights@pfpenergy.co.uk](mailto:customersubjectrights@pfpenergy.co.uk)
- For Business Customers – [businesssubjectrights@pfpenergy.co.uk](mailto:businesssubjectrights@pfpenergy.co.uk)
- For Prospective and Existing Employees – [employeesubjectrights@pfpenergy.co.uk](mailto:employeesubjectrights@pfpenergy.co.uk)

Alternatively, you can write to us at our registered address: Unit 2 Edward VII Quay, Navigation Way, Preston PR2 2YF.

## What type of information we collect from you?

The personal information we collect will depend on whether you are a domestic customer, business customer, existing or prospective employee of PFP Energy.

### *For Domestic Customers (including prospective customers)*

Personal details (including name, address, telephone numbers, e-mail address and date of birth)

Alternative information for identification purposes of proof of address documents (these can be residency agreements, alternative documents with your address on, photographic identification)

Financial information (such as bank details, payment and billing information or financial circumstances)

Information to enable us to provide you with energy supply (for example, meter types and numbers, energy consumption data, recorded calls, queries and feedback, energy quotes)

Details of visits to our websites (for further details please refer to our Cookies Policy)

### *For Business Customers (including prospective customers)*

Personal details (including names, date of birth if you are a sole trader or microbusiness, telephone numbers, e-mail addresses)

Financial information (such as bank, details, payment and billing information or financial circumstances, credit checks and searches)

#### **For Existing Employees**

Personal details (including names, address, telephone numbers, e-mail addresses)

References and CV's

Financial information (such as bank details, national insurance numbers, salary information)

Photographic identification and proof of address (such as copy of passport or visa, alternative documentation with your address on)

#### **For Prospective Employees**

Personal details (including names, address, telephone numbers, e-mail addresses)

References, CV's, cover letters and interview notes

Photographic identification and proof of address (such as copy of passport or visa, alternative documentation with your address on)

### **Information about processing of sensitive information**

Where necessary we may require to collect special categories of personal data such as ethnic origin, religious, political or philosophical beliefs, trade union membership, sexual orientation, data concerning health or relating to disability or vulnerability.

### **On what basis can we process your personal data?**

We will only process your personal data on the following lawful basis for processing: consent, contractual obligation, legal obligation, vital interest, public interest, legitimate interest.

#### **For Domestic Customers & Business Customers**

In most cases, the processing of your personal data will be necessary for the performance of our contractual obligations we have with you, or in order for us to enter a contract with you, for the supply of energy. The terms and conditions that provide details regarding the supply of energy can be found here:

[Domestic Customers Terms and Conditions](#)

[Business Customers Terms and Conditions](#)

[Principal Terms for Micro-Business customers](#)

In some cases, we will process your personal data in accordance with mandatory legal obligations that are imposed on us by our regulators, such as Office of Gas and Electricity Markets (Ofgem), or other governing bodies (e.g. Ombudsman Services, Department for Business Energy and Industrial Strategy).

Where we believe that it is necessary to process your information in the best interest of yours or the life of others we will do this under the vital or public interest where appropriate.

We may also process your information if it is necessary for the purposes of our legitimate interests, such as sales and marketing, customer experience improvement and customer feedback including business ratings and reviews unless our interests are overridden by your rights and freedoms. To

determine this, we will consider factors such as the information you have been given when you have provided your personal data to us, the nature of data and its impact of processing on you.

Where we are required to ask for your consent, we will always give you a choice to withdraw your consent in a straightforward way. If you are not yet our customer but would like to hear from us about our deals, offers, services and products, please let us know by e-mailing:

- For Domestic Customers – [customersubjectrights@pfpenergy.co.uk](mailto:customersubjectrights@pfpenergy.co.uk)
- For Business Customers – [businesssubjectrights@pfpenergy.co.uk](mailto:businesssubjectrights@pfpenergy.co.uk)

Likewise, should you wish to opt-out of marketing and sales information, please send us an e-mail to one of the above addresses.

#### *For Existing Employees & Prospective Employees*

We will process your personal data in accordance with the employment contract we have with you, or in order for us to enter into such contract with you. The employment contract, which consists of your individual contract, terms of employment with us and the employment booklet, will be discussed with you during your interview and copies provided upon commencement of your employment.

In some cases, we may be required to process your personal data in accordance with mandatory legal obligations to which we are subject under UK or EU law.

Where we believe that it is necessary to process your information in the best interest of yours or the life of others, we will do this under the vital or public interest where appropriate.

In rare circumstances, we may also process your information if it is necessary for the purposes of our legitimate interests, unless our interests are overridden by your rights and freedoms. To determine this, we will consider and assess factors such as the information you have been given when you have provided your personal data to us, the nature of data and its impact of processing on you.

### Processing of sensitive information

Processing of special categories data is only allowed where individual's explicit consent has been obtained, unless:

- It is necessary to fulfil obligations or exercise our or your rights in employment or social security;
- It is necessary to protect the vital interests of individuals;
- You have made this personal data manifestly public;
- It is necessary for the establishment, exercise or defence of legal claims;
- It is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee or medical diagnosis;
- It is necessary for reasons of public interest in the area of public health;
- The new UK Data Protection Act changes the definition of a special categories of data.

### Information collected from you about other individuals

### *For Domestic Customers*

There may be times where you may want to share with us personal information about others, such as to inform us that you are moving out of a property and a new individual will be responsible for the charges incurred through the supply of energy to this property. When you provide personal information to us about others, you confirm that you are allowed to do so. You should ensure that those individuals are aware of how their data will be used by us, for example by directing them to this privacy policy.

### *For Business Customers*

In commercial matters, in the course of providing the energy supply to your business, you may provide us with personal details of your contractors or employees. When you provide personal information to us about others, you confirm that you are allowed to do so and you should ensure that those individuals are aware of you providing their details and how their data will be used by us. You can direct them to this privacy policy.

### *For Existing Employees & Prospective Employees*

At times, you may need to provide us with third party data, for example your next of kin, or for the purpose of obtaining an employment reference. By providing such information, you confirm you have the permission of those individuals to disclose such information and that you have made them aware how we will process their data. In such circumstances, this data will be treated under the same data protection laws and you should refer those individuals to this privacy policy.

## Children

Our services are not aimed at children.

As an employee you may wish to share your children details with us for example, for the purpose of obtaining child vouchers. In such circumstances, we will explain to you why this information is required and how it will be processed at the point of collecting this data.

## What are we going to do with your information

We may use your information for variety of purposes, but we will always do so under the lawful basis for processing.

We may use your personal data to:

- Verify your identity and establish the source of payments for energy supply.
- Carry out appropriate credit checks (by conducting online searches using a third-party identity provider).
- This may affect your credit rating and you should refer to the Terms and Conditions for more information.
- Communicate with you during the course of providing our services, for example to obtain meter readings or deal with your enquiries, complaints or feedback.
- Issue you with service documentation, such as bills and statements.
- carry out obligations arising from any contract entered into between you and/or third parties and us as part of your energy supply or employment with us.

- Refer you to another body such as Citizen Advice, Energy Ombudsman or Information Commissioner Office.
- Statistical purposes of your energy consumption as far as we are required to do so in the carrying out of our business and services.
- seek advice from third parties in connection with your matters, such your previous or future energy supplier or network operators.
- If you commence registration with us but do not progress it to completion, we may use your information to contact you to find out whether you need any assistance in completing it.

## Information we collect about you from others

Information may be passed to us by third parties in the course of providing our services to you. The processing of this information will be necessary for the provision of energy supply to you.

When we obtain information about you from a third party rather than from you directly, we will notify you of any relevant information within a reasonable period and provide you with details including the type of data and source it came from. Typically, these sources may include:

- Individuals previously occupying the property you have moved into
- Price Comparison Websites or Energy Brokers
- Other third parties and contractors
- Credit referencing agencies
- Independent bodies, such as Citizen Advice or Extra Help Unit
- Government bodies, such as Energy Ombudsman or Information Commissioner's Office
- Public sources where this relates to you or your organisation, such as Companies House

## If we need to share your information with others

At times we may need to share your personal information with selected parties or other organisations (data processors) to carry out activities on our behalf. This will always only be done under the lawful basis for processing. Examples of circumstances where we may share your data:

### *For Domestic Customers & Business Customers*

- Persons who you have authorised to act on your behalf
- Network operators
- Agents acting on our behalf, such as Meter Operators, Data Collectors, Customer Relationship Management and Managed Service Providers and Financial Services Providers
- Other suppliers during the switch of your energy
- Energy brokers
- Data brokers
- Regulators and Industry Code Administrators, such as Ofgem, Meter Point Administration Services or Xoserve (the Central Data Service Provider for gas market), other governmental organisations (such as BEIS or DWP)
- Consumer Protection Organisations, such as Citizen Advice or Energy Ombudsman
- Organisations that assist with collecting reviews and feedback from people who had a buying or service experience with PFP

- Institutions working on detection, investigation and prevention of crime or fraud
- Debt collection and credit referencing agencies
- Financial organisations where payment processing, financial plans or refunds are required
- For Existing Employees & Prospective Employees
- Persons who you have authorised us to contact in emergency, such as your Next of Kin
- Persons you have asked us to contact for references
- Agents acting on our behalf to undertake Human Resources, Payroll and Pension related services
- Institutions working on detection, investigation and prevention of crime or fraud

## How long will we keep your data for?

We will only retain your information for as long as it is necessary to:

- Carry out the energy supply to the property you live in or your business
- Establish or defend any legal claims you might have made against us
- Comply with legal obligations under UK or EU law

### *For Domestic Customers & Business Customers*

Typically, we will store your personal details and financial information for six years from the date of your final bill.

Your marketing preferences will be stored by us until you tell us you no longer wish to receive marketing and sales information from us.

### *For Existing Employees*

Employment records relating to performance appraisals, employment contracts etc. will be retained for 6 years from the end of your employment with PFP Energy.

Payroll records for HMRC purposes, such as PAYE or SMP will be held securely for the period of 3 years from the end date of your employment with us.

### *Prospective Employees*

If you are unsuccessful during the recruitment process your personal data will be held by us for the period of 6 months.

In some cases we may offer candidates to keep their CVs on file for longer should a suitable opportunity arise at a later stage. If this will be the case, we will discuss this with you during the interview and ask for your consent to do so.

## Security of your data

Your data will be held on secure servers, and all reasonable technical and organisational measures will be applied to safeguard it from unauthorised access. Where necessary and possible any identifiable information will be encrypted or minimised. Our data processors are bound by the contractual relationship with us to ensure that any information we may need to share with them is also held in a secure and confidential manner.

If you have been provided with an access to a platform, such as your energy account or HR portal, you will be issued with a username and password which enables you to access certain parts of this system. You will be responsible for keeping your log in details secure. You should not share your log in details with anyone.

## Transfers outside European Economic Area (EEA)

PFP Energy does not transfer your personal data outside of the European Economic Area (EEA). Where we work with our data processors who may access or transfer personal data outside EEA this shall be made under the following conditions:

- A company or subsidiary located in a country recognised by the European Commission as providing an adequate level of protection.
- A company located in the United States of America that has adhered to the EU – US Privacy Shield Framework.
- A company which does not offer adequate protection but which transfer is governed by the standard contractual clauses of the European Commission, such as the Binding Corporate Rule.

In all circumstances, appropriate rigorous procedures as well as technical and organisational measures will be in place to ensure security and confidentiality of your personal data.

## Social Media

PFP Energy has presence on social media platforms such as Facebook, Twitter etc. Please be aware that if you choose to contact us via any social media platform and provide your personal contact details through that platform, you do so at your own risk and we cannot be held liable for any data breach on these platforms.

We recommend that you always contact us directly.

## Your rights

Under data protection laws you have certain rights to your personal data processed by us:

- Right to be informed – you have the right to know how we process your personal data. This Privacy Policy serves this purpose.
- Right of access – you can ask us to provide you with a copy of any personal information that we collect and hold about you.
- Right to rectification – you can request that any personal information that we collect and hold about you be updated or corrected.
- Right to data portability – you can ask for your personal information we hold about you in an electronic format to be transferred to another data controller, such as another energy supplier.
- Right to erasure – you can ask us to delete any or all your personal information. Please note that this is not an absolute right, and in some cases, we may not be able to action this request; for example, if we need to comply with legal obligations.

- Right to object – you can object to us processing your personal information. We will comply with this request unless there is an overriding legitimate ground for the continuation of the processing.
- Right to restrict processing – in some situations you can request that the processing of your personal information is restricted, for example if the processing is unlawful. Please note that this is not an absolute right, and in some cases, we may not be able to action this request; for example, if we need to comply with legal obligations.
- Rights relating to automated decision making and profiling – we may use systems to help us make automated decisions about you or your business based on the information we hold. This can include offering you a suitable tariff or deciding whether we can offer you energy supply. You can object to automated decision making.

Exercising your rights is in most cases free of charge and takes one month. We will need to confirm your identity before we can action your request.

If you choose to exercise any of the above rights, we will do our best to comply with your request unless there are legitimate business grounds e.g regulatory exemptions or legal reasons for which we cannot act upon your request. We will inform you should this be the case.

You should also note that if you choose to restrict or stop processing some or all your information, this may have an impact on our ability to provide a service to you.

To exercise your rights, please contact us using the contact details at the top of this page.

### Complaints about the use of your personal data

If you wish to complain about the use of your personal data, you can contact us at one of the e-mail addresses at the top of the page in order that your complaint can be investigated. You can also write to us at our registered address: Unit 2, Edward VII Quay, Navigation Way, Preston PR2 2YF.

If you remain dissatisfied with our response or believe that your personal data has not been processed in line with the data protection laws you have the right to complain to the Supervisory Authority, the Information Commissioner's Office (ICO), or seek judicial remedy.

Contact details for the ICO can be found on their website at <http://www.ico.org.uk>



# Cookies policy

Like many websites, we use cookies to improve your experience of our website.

## What is a cookie?

A cookie is a small text file that's stored on your computer. Cookies allow us to:

- Distinguish you from other users of the website
- Provide you with a good experience when you browse our website
- Improve our site.

## Browser settings

You can usually control of most cookies through the settings on your web browser. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [allaboutcookies.org](http://allaboutcookies.org).

## So what cookies do we use?

Cookie	Name	Purpose	Information	
Google Analytics	_utma	These cookies collect information about how visitors use our site. Information is collected anonymously. We use the information to improve the website. Information collected includes the number of visitors to the site, where visitors have come from and pages visited.	<a href="#">Click here</a> for an overview of privacy at Google	
	_utmb			
	_utmc			To opt out of being tracked by Google Analytics across all websites <a href="#">visit the Google site.</a>
	_utmz			
Crazy Egg	is_returning	We use CrazyEgg to get a better idea of how people navigate our website. This cookie only records whether you are a new or returning visitor. It does not store any information that could identify you.	To find out more visit <a href="http://support.crazyegg.com/cookies">http://support.crazyegg.com/cookies</a>	
Formisimo	Performance	Formisimo is a web analytics tool that helps website owners understand how their visitors interact with forms. Formisimo collects aggregated anonymous information and it reports website trends without identifying individual visitors.	To find out more visit <a href="#">Formisimo</a> .	

Formisimo uses a single cookie within a session to determine how visitors progress through a form. The cookie will expire when a user closes their browser window.

**Facebook  
Pixel**

Facebook Pixels help us to reach our existing audience on Facebook and supply them with relevant content.

To find out more visit [Facebook](#)

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