

# Privacy Policy

## About us

**Here at PFP Energy delivering great customer service is at the core of everything we do. We aim to treat you with honesty and integrity so that you can be confident that we are looking out for your interests!**

This Privacy Policy sets out how PFP Energy Limited (company number 08994981) and PFP Energy Supplies Limited (company number 09135694), operating 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. This policy also details how and why we process this data, who we share it with, and your rights and choices when it comes to your personal data. PFP Energy is a data controller, registered with the Information Commissioner's Office.

PFP Energy is committed to ensuring the privacy and security of your personal data. In this Privacy Policy, when we refer to "personal data", we mean information which could directly identify you (for example, your name or national insurance number) and information which could indirectly identify you, meaning that it could identify you when combined with other information which we hold about you (for example, your gender or date of birth). "Process" or "processing" means just about any conceivable use of personal data, including recording, storing, viewing or disclosing personal data.

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)

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

## What type of information do we collect from you?

We collect certain personal information from you, which is any information which might identify you. It does not include data where the identity has been removed (anonymous data).

The information we collect includes:

### For Domestic or Business Customers (including prospective customers):

#### **Personal Data**

Contact details and identification information such as: name, address, telephone numbers, email address, date of birth, photographic identification and proof of address such as residency agreements or alternative documents with your address on.

#### **Special Categories of Data**

Such as health or disability issues including data on the Priority Services Register. We use this information to better understand your individual circumstance and tailor our services to best help you.

#### **Financial Information**

Such as payment details and financial circumstances. We need your bank details if you want to pay by direct debit. If you have difficulty paying your bills, providing details of your circumstances can help us work with you to resolve this.

#### **Technical Data**

Internet protocol (IP) address, your login data, browser type, browser plug-in types and versions, operating system and platform and other technology. We track technical data by using cookies – see below for more details on cookies.

#### **Information about your supply**

Such as your meter reference numbers, meter type, energy consumption data, recorded calls, queries and energy quotes. This information enables us to link your details with the relevant meter, as well as ensuring industry records are kept up to date.

**Energy you use**

Details of your energy use and property occupation dates. If you have a smart meter we will take consumption data directly from your meter. You have a contractual obligation to provide us with details of your energy usage, as we need this to send you accurate bills. If we have to estimate your bills you may not be paying the right amount for your energy.

**Company Data**

With regards to companies, data such as names, phone numbers and email addresses of representatives of your company.

**Marketing and Communications Data**

Your preference in receiving marketing from us and our third parties and your communication preferences.

It's really important that the personal data we hold about you is up to date so please let us know if your personal data changes at any time.

**When will we collect it?**

We (and our agents) collect certain personal information from and about you during your sign-up journey, when you get in contact with us, when you use our website or as part of providing our services to you.

We may also monitor and record any communications we have with you, including phone calls and emails, to make sure we are providing an excellent service to all customers. This processing will not be used for any other reason but for training and quality purposes.

**Smart meter data choices**

For customers who have a Smart meter or will have a Smart meter installed, there are a variety of ways we can collect your energy usage data. These options can ensure bills are more accurate and therefore reduce the risk of you overpaying for your energy.

### Domestic Customers:

Unless you specifically opt out, PFP Energy can collect daily meter readings from your Smart meter(s), if installed by us or if we inherit your meter(s) from another supplier. You can request that we obtain half hourly, daily or once a month meter readings from your Smart meter. However, you would need to contact us to let us know your Smart data preferences. Some of our tariffs may allow for fewer data choices, but you would be notified of this upon tariff sign up.

### Business Customers:

Unless you specifically opt out, PFP Energy can collect daily/half hourly meter reads from your Smart meter, if installed by us or if we inherit your meter from another supplier. You can request that we obtain half hourly, daily or once a month meter readings from your Smart meter. However, you would need to contact us to let us know your Smart data preferences. Some of our tariffs may allow for fewer data choices, but you would be notified of this upon tariff sign up.

### 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, legitimate interest, legal obligation, vital interest and public 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 in our document centre:

[Domestic Customers Document Centre](#)

[Business Customers Document Centre](#)

[Key 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 learn more about how we handle data, please let us know by emailing:

- 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.

### **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. These circumstances are outlined as follows:

- Persons who you have authorised to act on your behalf;
- Agents acting on our behalf, such as Meter Operators, Data Collectors, Customer Relationship Management and Managed Service Providers and Financial Services Providers;

- Other energy suppliers and organisations who handle switches between suppliers;
- Energy brokers;
- Regulators and Industry Code Administrators, such as Ofgem, Meter Point Administration Services, Xoserve (the Central Data Service Provider for gas market) and ECOES (for electricity) and other governmental organisations (such as BEIS or DWP);
- Consumer Protection Organisations, such as Citizens Advice or the Energy Ombudsman;
- Organisations that assist with collecting reviews and feedback from people who had a buying or service experience with PFP Energy;
- Institutions working on detection, investigation and prevention of crime and fraud;
- Debt collection and credit referencing agencies;
- Other energy suppliers, landlords or housing associations if we or another organisation suspect property is connected with fraud or theft;
- Financial organisations where payment processing, financial plans or refunds are required;
- Smart DCC Ltd, who manage the data and communications network connecting smart meters to ourselves and other industry suppliers, to ensure consistency between suppliers.

### **Credit Reference Agencies (“CRAs”):**

When you join us or initially set up a direct debit with us, we’ll share your details with a CRA to check your identity and see if you may have any problems paying your bills.

We may also share information with CRAs on how you are managing your account with us and whether your account has fallen into arrears. They may share this data with others to help them make informed lending decisions.

To find out more about how CRAs use your Data, click here for the Credit Reference Agency Information Notice (CRAIN):

### **Retention of Data**

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; and/or

- Comply with legal obligations under UK or EU law.

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.

### 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, 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.

### Contacting you

If you've given us permission to send you marketing information we will respect your choices as to how you would like to receive this. Where necessary, we share your data with organisations that send communications on our behalf. For example, we ask Trustpilot and Mailchimp to send invitations to our customers requesting feedback on our services (you can find Trustpilot's privacy policy [here](#) and Mailchimp's privacy policy [here](#)).

### 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 breaches on these platforms. We are unable to control how these companies use your data or any information which is shared to us via their services, and we would also suggest you review their privacy notices yourself if you have any concerns.

We recommend that you always contact us directly.

However, any personal data we do receive via social media will be treated in line with our privacy policy and our standard data retention period.

## Your rights

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

### Data Subject Access Requests:

You have the right to find out whether we hold any personal data on you and if so, full access to your data by making a data subject access request under the Data Protection Act 2018. If we do hold your personal data, we will provide you a copy of that data and information about how we use it. We will usually send your data via email to you unless requested in another format.

### Additional Data Rights:

There are further rights you have in relation to your personal information. These rights are as follows:

- **Right to be informed:** you have the right to know how we process your personal data. This Privacy Policy serves this purpose.
- **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 or may not be able to action request; for example, if we need to comply with legal obligations.
- **Right to object:** you can object to us processing your personal information. Please note that this is not an absolute right, and in some cases, we may or may not be able to action request; for example, if we need to comply with legal obligations.
- **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 processing 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 an 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 beginning of this document.

### 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 email 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>

### Transfers outside European Economic Area (EEA)

Where we work with third parties, who act as data processors, and who access or transfer personal data outside the 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.

## Cookies

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; and
- Improve our website.

### Browser Settings

You can usually control 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?

#### Essential Cookies

We use a "Strictly Necessary Cookie" to save your cookie preferences. Further "Strictly Necessary Cookies" are used within a session to provide functionality. These cookies remember your 'logged in' status and how you progress through forms in order to compile the information which is then sent to us.



The cookies will expire at different times and are detailed in the settings window, which can be accessed by clicking on this icon via the bottom left hand corner of our webpage.

### Tracking Cookies

Our website uses Google Analytics to collect anonymous information such as the number of visitors to the site, and the most popular pages. You can opt in and out of these cookies by accessing the settings window on our webpage.

See below for details on our Tracking Cookies

Cookie	Purpose	Information
Google Analytics	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. To opt out of being tracked by Google Analytics across all websites add the Google Analytics <a href="#">Opt-out Add-on</a> to your browser.
Google Tag Manager	Google Tag Manager is a tag management service provided by Google LLC. We use the information from Tag Manager to improve the website. Information collected includes which pages have been viewed and which elements have been clicked whilst on the site.	<a href="#">Click here</a> for an overview of privacy at Google. To opt out of being tracked across all websites add the Google Analytics <a href="#">Opt-out Add-on</a> to your browser.