

# Privacy Policy

## About us

PFP Energy is committed to ensuring the privacy and security of your personal data.

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.

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):

- Contact details and identification information (including name, address, telephone numbers, e-mail address, date of birth, proof of address such as residency agreements or alternative documents with your address on, photographic identification);

- Financial information (such as bank details, payment and billing information or financial circumstances);
- Technical data (internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We track technical data by using cookies - see below for more details on cookies);
- 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);
- Marketing and communications data (your preferences in receiving marketing from us and our third parties and your communication preferences); and
- Special categories of data (health and financial vulnerability data, if applicable, to include you on the Priority Services Register).

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 and when you get in contact with us or 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 our customers.

## 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.

### Switching

We may also ask your previous energy supplier for personal information about you that will allow us to take over your supply (for example, information about your meter readings, meter technical details etc.). Similarly, if you switch away from PFP Energy, we may provide similar information to your new supplier so they can begin supplying your energy.

### Priority Services Register or special needs

If we believe that you (or a member of your household) need extra care (for example, because of your age, health, disability or financial circumstances) and we have your explicit consent to do so, we may record and share this information with the following people to ensure your supply isn't interrupted:

- other energy suppliers if we believe you are considering changing supplier,
- the electricity distributor; and
- the relevant gas transporter, metering agents or network operator.

### Consent

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 email addresses.

### Contacting you

We will contact you by the method we have agreed with you in our terms and conditions.

## 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.

## 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:

- 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
- Agents acting on our behalf, such as Meter Operators, Data Collectors, Customer Relationship Management and Managed Service Providers and Financial Services Providers
- 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

## Security

### Security of your data

PFP Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with. 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. We also limit any access to your personal data to those who need it and train our employees about the importance of maintaining the privacy and security of your personal data.

If you have been provided with an access to a platform, such as your energy account 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.

#### How long do we keep this information?

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

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.

#### Transfers outside European Economic Area (EEA)

PFP Energy is based in the European Economic Area. However, we may have to share personal data with third parties located outside of the EEA or process your data ourselves outside of the EEA in countries, including (but not limited to) the United States, Canada and India. Your personal data may be processed by staff operating outside the EEA working for us or third party data processors for the purposes set out in this Privacy Policy.

When we do send personal data outside the EEA, we will ensure that appropriate safeguards are in place to protect your data in accordance with European data protection requirements, such as the General Data Protection Regulation (GDPR). These may include:

- Sending information to countries which have been deemed as having adequate protection by the EU;
- Entering into European Commission approved standard contractual arrangements with the third party, or in the case of US based service providers, ensuring they have signed up to the EU-US Privacy Shield (see further [www.privacyshield.gov/welcome](http://www.privacyshield.gov/welcome)).

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; and
- 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?

- Google Analytics: These cookies collect information about how visitors use our site. Visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners) for an overview of privacy at Google
- Formisimo Performance: Formisimo is a web analytics tool that helps website owners understand how their visitors interact with forms. To find out more visit [www.formisimo.com](http://www.formisimo.com)
- Crazy Egg: We use CrazyEgg to get a better idea of how people navigate our website. To find out more visit <http://support.crazyegg.com/cookie>