



# 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](http://www.e.org).

## 1 What personal information we may collect

We, or third parties acting on our behalf collect your personal information from the following sources: -

- if we visit your home;
- when you apply or use our products and services via our website (includes cookies) and / or app (For details of how we use data via our app, see our MySmartE Privacy Policy via our website);
- when you contact us by phone, email, post, in person or via companies that introduce you to us; and
- when we collect your personal information from your smart meter(s).

## 2 How we may collect personal information

We use different methods such as email or when you contact us by phone to collect personal information from and about you, including as part of any direct interaction. We may also collect the following personal data criteria from you (and where applicable) through the following channels: -

<b>Identity Data</b>	Includes first name, last name, username or similar identifier, title, date of birth and gender.
<b>Contact Data</b>	Such as billing address, delivery address, email address and telephone numbers.
<b>Financial Data</b>	Includes bank account, payment card details and credit checks.
<b>Transaction Data</b>	Includes details about payments to and from you and other details of products and services you have purchased from us.
<b>Technical Data</b>	Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
<b>Profile Data</b>	Includes your username and password, purchases or orders made by you, your interests, preferences, and feedback / survey responses.
<b>Website Usage Data includes any automated technologies or interactions</b>	Includes information about how you use our website, products and services. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
<b>Marketing and Communications Data</b>	Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

<b>Aggregated Data</b>	We also collect, use and share Aggregated Data such as statistical or demographic data for analytic purposes (for example to improve our website and make it more attractive and easier to use). Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.
<b>Smart meter data (Including energy consumption data)</b>	We collect the following information from your Smart Meter: - <ul style="list-style-type: none"> <li>• Meter readings which tell us how much gas and / or electricity you've used and when you used it.</li> <li>• Information about how your smart meter is working (for example, any faults or if the meter has been tampered with).</li> </ul> (see section 4 for further details on how we use your smart data)
<b>Switching suppliers</b>	We collect information about you / your energy supplies from your previous supplier as part of the switching process;
<b>Third parties or publicly available sources</b>	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 also receive personal data about you from various third parties and public sources as set out below: <ul style="list-style-type: none"> <li>• Technical Data from the following parties: <ol style="list-style-type: none"> <li>1. analytics providers such as Google based outside the EU;</li> <li>2. advertising networks such as Google Adwords, Facebook and Instagram based inside the EU; and</li> <li>3. search information providers such as Google and Bing based inside the EU.</li> </ol> </li> <li>• Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Call Credit based inside the EU.</li> <li>• Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.</li> </ul>
<b>Legal and license requirements</b>	We may collect your personal information to comply with our legal and license obligations. This could for example be to assess eligibility against government schemes such as the Warm Home Discount (WHD) or Energy Company Obligation (ECO).

### 3 How we use this information

We may use the information we collect to: -

- identify you;
- provide the services as set out in our Terms and Conditions;
- manage your account with us, including any correspondence;
- maintain your account or your supply, and where applicable resolve any issues, which may include for quality assurance purposes, and handling any complaints you might make;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- monitor and review our services with a view to making any necessary improvements;
- where it is necessary for us to comply with any legal or regulatory obligations, which would include any terms within our license;
- provide industry flows to ensure you are charged the right amount for you energy supply; and to
- show you your energy consumption.

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 and / or regulatory obligations;
- to protect the vital interests of you and anyone in your household; and
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may share your information with:

- our third party subcontractors who provide our service to you;
- your previous supplier or if switching, new supplier;
- 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);
- credit and anti-fraud referencing service providers;
- relevant industry partners including the relevant fraud prevention agencies who may support the detection and prevention of fraud and energy theft;
- government departments and agencies to comply with regulation and relevant schemes;
- law enforcement agencies and other public authorities; or
- industry and regulated bodies or Government departments such as the Department of Work and Pensions to validate eligibility against license obligations or legislation.

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.

#### 4 How we use your smart data

Your smart meter(s) do not store other personal information that could directly identify you, such as your name, address or bank account. Also, if you switch to another energy supplier, we won't have access to data from your smart meter(s) after you have left us.

We can check the information from your smart meter(s) at any time, and use it to:

- Manage your energy supply, and spot any problems as soon as they happen.
- Help us (and the energy industry as a whole) to work more efficiently.
- Give you relevant advice to help you reduce your energy use and lower your bills.
- Improve our service to you and our other customers.
- Keep an eye on our products and services and give us ideas for new ones.
- Investigate misuse of your account, crime and fraud, including identifying and stopping energy theft.
- Look after our customers who have a vulnerability (for example, customer who are on the Priority Services Register)
- Develop and manage energy supply and demand.
- Work out your bills, so they're always up to date and accurate.
- Help you manage your energy use (For example, by sending you alerts via your In Home Display or meter(s) if you go over a budget you've set for your gas or electricity use, or are running low on available credit.

#### 5 Who else can see my smart meter data?

If we need to, we might share your smart meter data with:

- Organisations and agents that help us provide your products and services.
- Other energy industry organisations, like network companies, who help manage energy supplies and distribution.
- The Police or other organisations, including industry bodies who help spot and stop theft or fraud (under data protection laws).
- Third party organisations to support your use of MySmartE.

You can choose how often we take smart meter reads, this can be half hourly, daily or monthly. In order to manage your account to the best of our ability, we will take your smart data on a daily basis. However, you can 'opt-out' at any time. You can change your preference at any time by emailing [customer.service@e.org](mailto:customer.service@e.org).

##### If you have agreed to half hourly meter readings

We will process the data from your smart meter in the ways we have listed above. We do this because you have given us your consent. You can withdraw your consent at any point by switching to less frequent meter readings (which may impact the products and / or services we are able to offer you).

## 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.

### 6.1 Our legitimate interests are:

- to market relevant 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; and
- report fraudulent activity to credit reference agencies, fraud prevention agencies, Police and / or financial regulators.

## 7 Keeping in touch with you

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.

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.

We may also use your information to let you know about other relevant services in accordance with the terms of this Privacy Notice.

### How we look after your personal information

The Information we hold about you is stored on our secure servers which are protected from external access.

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.

We, or a third party who we share personal information with may host, store and handle this information inside the European Economic Area (EEA). 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 UK.

We, or a third party who we share personal information with may host, store and handle this information outside of the EEA. 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 UK.

## 8 Your rights over your personal information

Under Data Protection law you have the right to protect and look after your personal information.

You have the right to ask us to provide you with a copy of any personal information we hold about you.

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).

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; and
- 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).

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.

If you are unhappy with the way we handle your personal information, please contact our Data Protection Manager at E at: -

The Data Protection Manager  
T3, Trinity Park,  
Bickenhill Lane,  
Birmingham,  
B37 7ES

Or email [customer.service@e.org](mailto: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/](http://www.ICO.org.uk/concerns/)

## 9 How long we will hold your personal information

We will keep your personal information for no longer than is necessary to support your account and delivery our services to you, we will only use your data for the purposes for which it was collected for.

We will retain your data for the period your account is with and up to 6 years after your account with us is ended. 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.

This means that some of your personal information will be kept for a shorter timeframe 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.

## 10 Changes to our Privacy Notice

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](mailto:customer.service@e.org).