



MySmartE PRIVACY POLICY



E (Gas and Electricity) Ltd is dedicated to protecting your privacy. It is important to us that you are aware of what information we collect about you, how it is collected and how we use your personal data, in connection with your use of the MySmartE app (hereinafter referred to as the “service”). This Privacy Policy explains just that. It also describes your rights towards us and how to exercise them.

It is important that you read and understand this Privacy Policy before using the service. By using the service, you accept this Privacy Policy and our processing of your personal data.

Personal information we collect

Information you give us. We receive and store any information you provide to us. For example, we collect personal information such as your name, address, mobile phone number and email address, when you register a user account in the service. Some information may also have been given to us prior to your registration in the service, due to your contractual relationship with us. We also collect information you provide to us regarding your household, such as heating type, living space and similar. You can choose not to provide us with certain information, but then you may not be able to register an account or take advantage of all features of the service.

Information we collect about you. When you use the service, we may collect information about your household from your electricity meter, sensors & devices connected to the service or information asked for in the service. Information collected from such sources, may include information about your electricity consumption, type of household, zip code and location of your supply point and information about temperature. We may also collect information about your use of the service, e.g. how you use the service, including page response times and settings.

What we do with your personal information

E (Gas and Electricity) Ltd processes personal data for the following purposes and based on the following legal bases:

- **To register your account.** We will process your personal data in order to create your user account. The legal basis for this processing (i.e. why the data processing is necessary) is to enter into a contractual relationship with you regarding the service.
- **To provide the service to you.** We will process data related to your household and electricity consumption, in order to provide you with information and analysis regarding your electricity usage. The legal basis for this processing is to fulfil our contractual obligations towards you.
- **To communicate with you.** We may use your personal data to send you alerts or service messages regarding your electricity usage. We may also use your data to send you important information regarding the service. The legal basis for this processing is to pursue legitimate interests. If you do not wish to receive such alerts or messages, you may turn off notifications in your account settings.
- **To develop and improve the service.** We may use aggregated and non-personal information (not related to you specifically) to develop and improve the service, including troubleshooting, data analysis, testing, research, and statistical purposes. The legal basis for this processing is to fulfil our contractual obligations towards you and to pursue legitimate interests.

Information we share

We may transfer to or share your personal data with our suppliers and subcontractors for the performance of our contractual obligations with you and for the other purposes described in this Privacy Policy. Our suppliers and subcontractors are not authorised by us to use or disclose your personal data except as necessary to perform services on our behalf or to comply with legal requirements. For instance, the service is developed and provided by Eliq AB, a company registered in Sweden with Swedish company number 556763-2699, on behalf of E (Gas and Electricity) Ltd.

In addition, we may disclose information about you if we are required to do so by law or legal process, or to law enforcement agencies following an appropriate request.

Please note that we will not sell your personal details to third parties, unless we have your permission to do so.

Where we store your personal data

We always strive to process your MySmartE data within the EU/EEA. The data may however in certain situations be transferred to, and processed in, a destination outside of the EU/EEA by a supplier or subcontractor. In such cases, E (Gas and Electricity) Ltd will take all reasonable legal, technical, and organisational measures to ensure that your data is treated securely and with an adequate level of protection compared to and in line with at least the level of protection offered within the UK.



How long we keep your personal data

We keep your data only as long as necessary to fulfil our contractual obligations towards you, i.e. for as long as you have an active account for use of the service. However, we may keep your data for a longer period if we are required to do so by applicable statutory retention periods.

Cookies

Like many companies, we use “cookies” and similar technologies. Cookies and similar are only used to save your account settings (eg. location settings, email, password or notification settings) and to track your use of the service, to get a better picture on how we can improve the service.

Your rights

You have the right to know what personal data we process about you and may request a copy free of charge. You are also entitled to have incorrect data about you corrected and you may in some cases ask us to delete your personal data, for example if the personal data is no longer necessary for the purpose it was collected. You may also object to certain personal data about you being processed and request that processing of your personal data is limited. Please note that limitation or deletion of personal data may result in that we cannot provide the service to you. You also have the right to receive your personal data in a machine-readable format and have the data transferred to another party responsible for data processing.

Security

E (Gas and Electricity) Ltd uses technical and organisational security measures to help protect your personal data against loss and to guard it against access by unauthorised persons. We regularly review our security policies to ensure our systems are secure and protected.

Updates to our Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in the service or our collection and use of your personal data. We will notify you of any significant changes to our Privacy Policy and indicate at the bottom of the Privacy Policy when it was most recently updated.

How to contact us

E (Gas and Electricity) Ltd is registered in the UK under the registration company number 08520118 with principal place of business located at the address below. You may always reach out to us on matters of privacy and data protection by sending an email to our Data Protection Manager by using the following details: -

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

Or email customer.service@e.org

E (Gas and Electricity) Ltd is the responsible entity (controller) for the processing of your personal data as described above. E (Gas and Electricity) Ltd is subject to UK data protection legislation, including the General Data Protection Regulation (GDPR).

You may also report complaints regarding our processing of your data to the Supervisory Authority, whose details are below: -

The Information Commissioners Office (ICO):
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF,

Telephone: 0303 123 1113

Online: - www.ICO.org.uk/concerns/

