



Privacy Policy

This privacy policy explains how we use the information we collect about you, our customers, and other users of our services. This privacy policy is about how we use personal information about individuals, sole traders, or partnerships. It does not apply to the information we hold about companies or other organisations.

The Data Controller is Utility Point Ltd, Merck House, Seldown Road, Poole, Dorset BH15 1TW. We are registered with the Information Commissioner's Office as a data controller with the reference **ZA300338**.

1. About this policy

This policy explains how Utility Point collect information about you and the security measures we take to protect your privacy and security.

2. Website Hosting

Our Website is a secure HTTPS site and is hosted on a dedicated and secure UK based server.

Our website may contain links to 3rd party websites (for example, to manage Utility Point Rewards or regulatory bodies). We are not responsible for the privacy practice of those sites.

3. Online Forms

If you fill out one of our online forms, a notification email will be sent to the relevant team within our company. No copy of the data you submit is stored anywhere. As our website uses SSL (https) the data you submit using the form is encrypted when you press the "Submit" button.

4. How to set your preferences

When we first ask you for your personal information, or when you get a new product or service from us, we'll give you the opportunity to tell us whether you want to receive information from us about our other products and services. It will usually be a tick box on an application or contract, and you can change your preferences at any time via your online Utility Point Hub or by calling us on 0345 557 7878.

5. How we will use your information

It's important that you understand what we'll do with the data that we hold about you, as well as the lawful reasons we are allowed to do this.

We may sometimes combine information that we collect from you with information we obtain about you from third parties and affiliates and information derived from any other subscription, product, or service we may provide.

We use the information we hold about you for the following purposes:

5.1 We may use your information because of our contract with you to:

- Give you the service you've asked for (which might include the loyalty and incentive schemes we run from time to time)
- Offer your account, services and products from us or our partners. To do this, we may use an automated scoring system, which also includes information from credit reference agencies and other companies
- Help run and improve our accounts, services and products – provided at any time, past, present or future
- Create statistics, test our computer systems, create profiles and marketing opportunities and to analyse customer information. To do this we may use information about what you buy from us and



how you pay for it – for example how much energy you use and any optional services you've selected.

- Help prevent and detect debt, fraud and loss
- Train our staff
- Let you know about products and services that we or our partners offer, by email, phone, text message, multimedia message or other electronic communications (e.g. a message via a smart meter in home display)

5.2 We may monitor and record communications we have with you. Including emails and phone calls. We do this to ensure we provide you with an excellent standard of service and to meet our regulatory and legal responsibilities.

6. How we will get in touch

We will use the information you provided when we need to get in touch. This means we may email you, call you, send a text or may even visit you in person.

If we are contacting you to tell you about any offers we may have we will try to use your preferred contact method. We will stop sending you these offers at any time – you just must contact us and give us your details.

7. Passing your information on to other parties

7.1 We may allow other companies and organisations to use your information. Why?

- To give you the services you have asked for, which may include giving information to members of your family, household, anyone acting on your behalf or other interested parties (such as landlords or letting agents).
- Our engineers and other subcontractors we use to help us with installations and to attend emergencies.
- Our meter operators, where we may need to share information such as your meter point details and technical details regarding your meter. If there was ever a situation where your meter needed to be exchanged, we would pass your contact details to our meter operator, with your permission.
- Anyone who is named and authorised on discussing or managing your energy account.
- Our group companies, where necessary for the provision of our services.
- As part of our sales process for one or more of our businesses
- To help identify and prevent debt, fraud, or loss (for example by passing information to a credit reference agency).
- To transfer any unpaid debt to another organisations – we will have to give them information about you and that debt.
- For regulatory or legal purposes
- For future legal action
- As part of any government data sharing initiatives, like those designed to help people may be struggling to pay for their energy.
- As part of any loyalty scheme.
- To providers of any other product or service where Utility Point act as the introducer – for example financial services and will writing services. For example, we provide details to



enable the providers to contact you and assess your needs and to develop new products and services.

7.2 If we suspect someone has stolen energy or fraud by diverting an energy supply or tampering with the meter, we'll record this in our records and may share the information with Ofgem, or anyone else who needs to know (such as landlords, housing associations or other suppliers). If the energy (gas or electricity) to your property has been stolen or tampered with (or we suspect it may have been), we may take this into account when we decide what products or services we can offer you, and any terms and conditions we are able to give you.

7.3 We may ask your old energy supplier for information we need to take over your supply, including meter readings, equipment, and payments. We can pass on that kind of information to your new supplier should you move on, too.

7.4 If we think that you (or anyone in your household) might need extra support or care (for example, because of age, health, disability or financial circumstances), we may record this in our records. We will use this information if things go wrong in the future and may share this information with:

Support Organisations

Such as social services, charities, or healthcare organisations. We will pass on your information to them if we think you (or someone in your household) needs help.

Other energy suppliers

If you are thinking of changing, we may pass your information on to your new suppliers. We will assess which customers may need extra care and record and may share this information in line with the Energy Retail's Association procedures – which means we may share it with your gas transporter, meter agent or network operator too.

8. Protecting your information

We have strict security measures to protect your personal information. This includes following our security procedures (like confirming your identity when you call us) and encrypting data on our websites.

8.1 If you give us information on behalf of someone else, you're confirming that you've given them the information in this policy and that they have agreed for us to use it in the way we've described in this document. You also agree, and where appropriate the person the information is about has agreed, that any sensitive information about yourself or other people can be used in the ways set out in this document.

8.2 You are entitled to have a copy of the information we hold on you and you can have any inaccurate information corrected.

8.3 Should we update this policy your consent to the updated policy will be by continued use of our website, products, or services.

9. Data Retention

Unless stated elsewhere in this document or in our terms and conditions we only store the data necessary to provide the services we provide to you. We will keep this data as long as it is lawful for us to do so (this may be for as long as you are a customer or because of a legal or regulatory obligation to retain the information, whichever is the longest).



10. The Internet

Remember that communications over the internet (like emails and webmail's) aren't secure unless you've encrypted them. These kinds of messages can go through several countries before they are delivered, and therefore we cannot accept any responsibility for any unauthorised access or loss of personal information if it's beyond our control.

11. Cookies

To make full use of our website, your computer, tablet or mobile phone will need to accept cookies, as we can only provide you with certain personalised features of www.utilitypoint.co.uk by using them. We may use cookies to monitor how people use our site. This helps us to understand how our customers and potential customers use www.utilitypoint.co.uk so we can improve things like layout, function and design.

Our cookies do not store sensitive information such as your name, address, or payment details: they simply hold the 'key' that, once you're signed in, is associated with this information. However, if you'd prefer to restrict, block or delete cookies from www.utilitypoint.co.uk, or any other website, you can use your browser to do this.

Each browser is different, so check the 'Help' menu of your browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

What is a cookie?

Cookies are tiny text files stored on your computer when you visit certain web pages. We use cookies to keep track of what you have input, and to remember you when you return to our site.

To use www.utilitypoint.co.uk, you need to have cookies enabled, as we will need to place cookies in your device to enable any sign up to go through.

If you do not wish to enable cookies, that will mean that your experience of using the site will be impaired – as some of the cookies help us to identify and resolve errors when you're browsing. Most web browsers have cookies enabled, but you can turn them off/on should you need to.

Do not track (DNT) is a feature offered by some browsers, with some newer browsers offering it as default. If you enable it, it sends a signal to websites to request that your browsing is not tracked, for example by third party ad or social networks, or analytic companies.

At present no industry-wide uniform standard has been agreed and adopted to determine how DNT requests should be managed, so www.utilitypoint.co.uk doesn't currently respond to DNT requests. Until that standard is established, we will continue to review DNT and other new technologies but will not respond to DNT requests.

We are giving you this information as part of our initiative to both comply with legislation, and make sure we are honest and clear about your privacy when using our website.

How do I stop using cookies?

You can normally alter the settings on your browser to prevent it from accepting cookies, or to tell you when a website tries to put a cookie on your computer. www.utilitypoint.co.uk does not operate properly without cookies, but you can delete them at any time using your web browser.



12. Links

We provide links to sites provided by other providers (for example to manage Utility Point Rewards, or to offer financial services). We are not responsible for the privacy practice of those sites.

13. Third Party processors

We use several third-party cloud-based services because we have a legitimate interest to do so for the purposes of effectively running our business and providing our services to you. We also use several third-party organisations (e.g. accountants, Recruitment agencies etc.).

In all cases where we are using a third-party service or company, we will only provide the minimal amount of information for the purposes of delivering the service to us and to meet our requirements.

14. What types of personal data do we collect, obtain and share

The information we collect includes your name and contact information that you volunteer such as your telephone number, email address, mobile number, and postal address. We also ask you for your date of birth and bank details during creating your account and details of other people linked to your account. We will collect financial information about your bank account or credit card details where appropriate. Where you elect to register for our PSR service (priority services register) we may collect sensitive information you volunteer such as medical conditions solely for the purpose of providing the appropriate support. We will never collect other sensitive information such as your religious or political beliefs.

14.1 Where we process your personal data because we have a legitimate interest to process these items of your personal data to enter or fulfil the contract between us, including:

We process these items of your personal data because we have a legitimate interest to do so. We process the following categories of personal data, including:

Maintain and improve our products and services, e.g. optimise business end to end processes, including assessing whether you can be moved to paperless billing to online services, quality assurance monitoring purposes, support efficient management of our staff, analyse where sales leads have come from, analyse performance data of webpages and provide relevant content to you.

For market research purposes, e.g. to understand how you use our products and services or how we might improve them. Develop any of our new products and services, assess which of our new products and services that may be of interest to you, e.g. To understand regional data demographics and existing or potential take up, specific Up offers and recommendations to our customers' needs and reward loyal customers via our UP rewards. This may include matching your data with data we obtain from other companies.

We may also use third party providers because we have a legitimate interest to do so to obtain contact information in order to market our products and services to you, but only in accordance with latest law and will always respect your marketing preferences as well as the telephone preference service.

15. Your rights

Under current data protection legislation in the UK, you have rights as an individual you can exercise in relation to the data we store and process about you. You can find more information about your rights on the Information Commissioner's website:



<https://ico.org.uk/for-the-public/>

15.1 Complaints

If you want to make a complaint about the way we are processing your data, you can contact us (see section 18 below). You also have the right to complain to the Information Commissioner's Office: <https://ico.org.uk/concerns>

The ICO's address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

15.2 How to withdraw consent and object to processing

Where we are processing your data and needed to ask your permission to do so, you can withdraw your consent at any time. If you wish to stop receiving our marketing emails you can do so by clicking the "unsubscribe" link at the bottom of the email, or by changing your preferences in your online portal, or by contacting us using the details below.

If you wish to raise concerns about the way we are processing your data or would like to raise an objection then please email us via dataprotection@utilitypoint.co.uk with your concerns.

15.3 Keeping your data up to date

It is important that any of your data that we process is kept up to date. We will from time to time ask you to verify your contact details but if you wish to update any information, we hold about you, please contact us using the contact details below in section 18.

15.4 Erasure of your data (the "right to be forgotten")

Under some circumstances you may request us to delete your data from our systems. Where this is possible (e.g. we do not have any legal purpose for continuing to process your data) we will erase it from our systems.

If you wish to exercise your right to be forgotten, please email dataprotection@utilitypoint.co.uk.

15.5 Portability

Your right to portability allows you to request a machine-readable format of the data you supplied to us and associated service logs (where we store them). Please contact us, using the contact details listed in section 18 below if you wish to receive a CSV export of your data.

15.6 Access to your data

You have the right to ask us about what data we hold about you, how we process it and provide you with a copy of the information, free of charge and within one month of your request.

To make a request for any personal information we hold and process about you, we would prefer it if you could put it in writing or in an email to the addresses below. We will need to verify your identity before providing the information and where necessary may contact you further to ensure we understand what data you are requesting.



16. Disclosure of information

We do not share any personal data with any third parties unless it is lawful for us to do so, if required by law to do so or if you provide us with permission to do so.

17. More information

For more information about your data rights and privacy or data protection in general visit the Information Commissioner's Office website: <https://ico.org.uk>

18. How to contact us

If you have any questions about how we collect and use your information not covered in this privacy notice, or if you wish to speak to someone about our approach to data protection and privacy, please contact:

By email — dataprotection@utilitypoint.co.uk

By telephone — [0345 557 7878](tel:03455577878)

In writing — Data Protection Officer, Utility Point Limited, Floor 7, Merck House, Seldown Road, Poole BH15 1TW

19. Changes to our privacy notice

We may change or update elements of this privacy notice from time to time or as required by law. The most current version of our privacy notice is available on our website at <https://www.utilitypoint.co.uk/privacy-policy>.

20. For our legitimate business interests

This means that using your information is necessary for us to build our business and provide our services to you. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include:

Maintaining and improving our services: for example, we may use your information that we obtain through your emails and calls to train our team. We may also use your information to ensure that our services are working as intended – for example, understanding which parts of the website are easiest to use. We may also contact you for suggestions on how we can improve the way we provide our services to you.

Providing personalised services, including suggested payment amounts: for example, we may use information such as your account balance and expected annual energy use to make an automatic adjustment to your payment amount.

Providing personalised advertising: we may let advertising platforms like Facebook and Google know that you are a member of Utility point by sharing your contact details with them. This means we can stop asking you to join Utility point once you are with us, and instead share information with you that we think you might be interested in.

Communicating with you about our services: we may contact you about Utility point news, product updates and new products that we think you might be interested in. We may also contact you to provide you with offers, competitions, marketing materials and other promotional materials, both online and through other marketing channels, such as third-party social networks, like Facebook.



Measuring our performance and developing new services: for example, we use data for measurement to understand how our services are used. We also use aggregated data to understand our members and their energy usage better. This helps us develop offerings such as our Annual Impact Report.

Helping to prevent and detect fraud or debt: we also need to be able to detect and prevent fraud and recover unpaid bills.

If you have questions about the lawful basis on which we collect and use your information, you can email our Data Protection Officer at dataprotection@utilitypoint.co.uk.