

Professional Energy Purchasing Ltd. (**the Company**) is committed to protecting the privacy of your personal information. For the purpose of applicable data protection law, including the Data Protection Act 1998 and, from its entry into force on 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) (together, **DP Law**), the Company is the data controller. You will see the Company referred to as Professional Energy Purchasing and PEP Ltd. on the site. Our Privacy Notice explains what we do with any personal information which we collect from you. If you have any questions regarding our Privacy Notice, please contact us at the address on the About Us page of this site or email us at info@pepqb.com.

This Privacy Notice explains how we collect, use and disclose personal information about you when you visit the site and when you contact us, whether by e-mail, post, fax or telephone using the contact options on the site.

What type of personal information do we collect?

The personal information we collect from you is used primarily to enable us to provide the specific service you require.

Personal information can include the following:

- your title, forename and surname and gender;
- your personal or work related (depending on which you choose to submit) e-mail address
- your personal or work-related contact details (depending on which you choose to submit) such as your telephone number(s), fax numbers and postal address;
- your contact and marketing preferences;
- if you take a survey or interact with us in various other ways - demographics information and information about subjects that may interest you;
- information necessary for legal compliance;
- where you "like" us or make posts on our pages on social networking websites, such as Facebook, Twitter, YouTube and Instagram.

Personal information also includes special categories of personal data. This is data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning your health, sex life or sexual orientation. In the unlikely event that any of this is collected from you during your use of the website or during any other offline interaction with us you may be asked at the point of collection to provide your explicit consent where needed in order to justify our processing of it.

The legal basis for our use and other processing of your personal information under DP Law

This will include (as relevant):

- processing your personal information so that we may perform our obligations under a contract with you (such as a product or service agreement with you) (“**Your Contract**”);
- processing for legitimate interests provided these are not overridden by your interests and fundamental rights and freedoms (this includes our own legitimate interests and those of other entities and branches in our group of companies). For example, this is relevant when we use and process your personal data to deal with our legal and regulatory and internal governance obligations; and in addition / together with the processing condition described above (“**Legitimate Interests**”),
- processing which is necessary for compliance with our legal obligations laid down by European Union law (where relevant) and by English Laws applicable to us in the United Kingdom (“**Our Legal Obligations**”).
- your consent may also be a lawful reason for processing your personal data in certain cases (“**Your Consent**”). This means your freely given, specific, informed and unambiguous consent which may be collected from you, for instance: when you agree to receive marketing communications from us or when you agree to take part in surveys or market research (as relevant). You should be aware that you are entitled under DP Law to withdraw your consent where you have given it to us at any time. If you do this and if there is no alternative lawful reason for us to rely on to justify our use or other processing on your personal data, this may affect our ability to provide you with some of our services.

In summary, we need certain categories of personal data in order to provide you with our services. Certain other personal data is processed for our Legitimate Interests in cases where this does not result in prejudice to you.

What other personal information do we collect and why?

In this section we explain the personal information we collect from you when you interact with us online and offline. Where we explain why we use this information, we have also referred to the relevant legal basis which we consider applies to the processing, as explained in the section above. Presenting the information in this way will make it easier for you to understand your rights in relation to your personal information, and this is explained

further below in the sections headed “Your rights to access your personal information” and “Your rights under DP Law”.

Legitimate Interests

We automatically collect standard internet and website log information to understand how our website visitors behave, which we use to improve your experience online. This may include information about your Internet Service Provider, your operating system, browser type, domain name, the Internet Protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the web pages you request and the date and time of those requests.

Our collection of website use information may also involve the use of cookies and Web beacons. Please see our Cookies Policy for more information.

When you use any of the services below, you may need to provide us with some additional personal information so that we can liaise with you in order to deal with your request, query, application and/or customer account registration. If you do choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Notice.

- contact us by email using the information on our websites;

Our Legal Obligations and/or Legitimate Interests

- we may also record phone conversations to offer you additional security, resolve complaints, for staff training purposes and to improve our service standards;

Your Contact and/or Legitimate Interests

- apply for any of our products;

Your Consent

- sign up to receive our various newsletters by email; and
- be notified of products and/or services that may be of interest to you

How we use your personal information

We have explained below the purposes for which we may use information about you. As with the section above, we have explained why we use your information with reference to the relevant legal basis. Presenting the information in this way will make it easier for you to understand your rights in relation to your personal information, and this is explained further below in the sections headed “Your rights to access your personal information” and “Your rights under DP Law”:

We may use your personal information for the following legitimate interests:

- to respond and/or deal with your request or enquiry;

- to improve our products and services and to ensure that content from the websites is presented in the most effective manner for you and for your computer (or other electronic Internet-enabled device);
- to administer the websites;
- for internal record keeping;
- to contact you (directly, either by the Company, Group or through a relevant partner or agent) by e-mail or phone for any of the above reasons;
- where necessary as part of any restructuring of the Company or sale of the Company's business or assets;
- to analyse trends and customer journeys in using and accessing our websites;

Your Contract

- to perform any contract the Company has with you;

Your Consent

- subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing;

Our Legal Obligations

- monitoring and recording of telephone calls and email communications where necessary for compliance with regulatory rules or self-regulatory practices or procedures relevant to our business, to prevent or detect crime, for quality, training and security purposes; and
- for compliance with our legal, regulatory and other good governance obligations.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal information that we maintain will be kept in paper files, while other personal information will be included in computerised files and electronic databases.

Data Anonymisation

We may convert your personal data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct market research and analysis, including to produce statistical research and reports. For example, we may produce reports on which of our product and services are most popular. We may share aggregated data in several ways, including for the same reasons as we might share personal data (see below).

In addition, we may use pixels or transparent GIF files, to help manage online advertising.

How long do we keep your personal information for (and the criteria used to determine this)?

• Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Notice and to allow us to comply with our legal requirements. The criteria we use to determine data retention periods includes the following:

- (i) **Retention in case of queries.** We may retain it for a reasonable period (up to 12 months) after you have enquired about one of our products or services in case of follow up queries from you;
- (ii) **Retention in case of claims.** We may retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for 6 years) if and to the extent this is relevant; and
- (iii) **Retention in accordance with legal and regulatory requirements.** We will consider whether we need to retain your personal data after the period described in (ii) (above) because of a legal or regulatory requirement. Some or all of these criteria may be relevant to retention of your personal data collected in connection with our products and services.

- If you would like further information about our data retention practices please contact us (see below).

Managing your marketing preferences

We may wish to provide you with information about new products, services, promotions and offers, which may be of interest to you. We may also invite you to take part in market research or request feedback on our products and services. This communication may occur by e-mail, telephone, post or SMS. We will seek your consent for this where necessary under DP Law. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data and if you do not wish to consent then please do pay attention to the marketing consent check boxes.

You also have the right to ask us not to process your personal data for marketing purposes at any time. This means you can change your mind about receiving marketing communications from us when you have previously consented to this. You can opt-out of receiving such communications by clicking the “unsubscribe” link on any email that we send to you or by emailing at info@pep.gb.com at any time.

Please note that marketing communications are not the same as “information only” communications and that consents are not usually required in order for us to communicate with you about the products or services you have enquired about or have signed up to obtain through the Websites, using contact details you have provided for this purpose.

Your rights to access your personal information

You have a number of other rights in respect of your personal information under applicable DP Law. These include the right to access or obtain copies of your personal information and to have inaccurate information about you corrected.

Your rights under DP Law

As well as the right to access the personal information we hold about you, you have a number of other rights in respect of your personal information under DP Law. These may include (as relevant):

- the right to access or obtain copies of your personal information that we hold (see above);
- the right to rectification, including to require us to correct inaccurate personal data;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine-readable format in certain circumstances such as where our processing of it is based on your consent;
- the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and
- where you have an option to provide us with your personal data or not in connection with your use of our website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us;
- the right to withdraw your consent to any processing for which you have previously given that consent.

Please be aware that some of these rights will only become relevant when changes to DP Law come into force in May 2018.

Please contact us at info@pepqb.com if you would like to exercise any of your rights explained above in relation to your personal information.

Your right to complain to the data privacy supervisory authority

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the UK's Information Commissioner if you consider that we have infringed applicable data privacy laws when processing your personal data. In the **UK** the Information Commissioner's Office can be contacted using the following link: <https://ico.org.uk/>.

Keeping you informed

We will keep your details on record whilst acting on your behalf as per our letter of authority and then for a reasonable period afterwards, in accordance with data protection and other applicable legislation.

The Company may keep your details on record for as long as is necessary for the purposes set out above and will then endeavour to delete your details in accordance with data protection and other applicable legislation.

Changes to this Notice

We keep this Notice under regular review. We may change this Notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. Where you have provided us with your email address, we may also contact you to let you know that we have updated the Notice. We may also take that opportunity to ask you if you would like to update your marketing preferences.

This Notice does not extend to your use of, provision of data to and collection of data on any website not connected to us to which you may link to by using the hypertext links within our websites.

Contact/address details

If you have any questions about this Notice, please contact us via:

info@pepqb.com

0114 327 2645.

www.pepqb.com