

Go Effortless Energy Privacy Policy

Go Effortless Energy is committed to ensuring the privacy and security of your personal data. The following Privacy Policy sets out the personal data that we collect about you as a user of our products and services, including how and why we process your personal data, who we share it with, and your rights and choices when it comes to your personal data.

In this Privacy Policy, when we refer to "personal data", we mean information which could directly identify you (for example, your name) 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.

Effortless Energy Limited (company number 08711077) is the data controller of your personal data (referred to in this Policy as "Go Effortless Energy" or "we").

If you have any questions about your personal data which are not answered by this Policy, please contact our Data Protection Officer:

Data Protection Officer
Go Effortless Energy,
Chatterley Whitfield Enterprise Centre
Biddulph road
Stoke-on-Trent
ST6 8UW

dataprotection@goeffortless.co.uk

How we collect your personal data

Information provided by you

We collect your personal data to give you the best possible experience as a user of our products and services. In general, we collect information from you when you interact with us to request a quote or availability check, open up an account, visit our website, enter a competition, complete a survey or contact us with an enquiry or complaint. This covers all channels of communication with us, including over the telephone, email, live chat, website, social media and in person.

We'll collect the following information from you when you request a quote or availability check:

- Your name
- Contact address
- Email address
- Telephone number

- Meter readings (if you are an energy customer)

When you open an account, we'll also collect:

- Name and contact details of individuals authorised to access your account
- Previous address history
- Your date of birth
- Bank account or payment details

To be sure that we're offering you the best option for your circumstances, we may request additional personal data to check whether you're eligible for certain tariffs or government discount schemes. This might include:

- Details of your household income
- Information about any health or medical conditions that you may have

If you feel you're in a vulnerable situation, we may ask you for and/ or process the following information so we can fulfil your request appropriately or place you on our Priority Service Register:

- Details of your health or medical conditions
- Any other information that you provide us with as part of your application

Should your circumstances change, we may also ask for the following to allow us to service your account:

- Your new address or a copy of your tenancy agreement, should you move home
- Banking details, should you decide you would like to set up a direct debit with us
- Documentation to support a change of name request, such as a marriage certificate, decree absolute or deed poll
- Documentation to help us close or transfer an account in the case of a bereavement, such as death certificates, solicitors' correspondence, wills or probate documents.

We will also obtain or request the following information if you contact us with an enquiry or complaint:

- Any information that you disclose to us as part of your enquiry or complaint
- Necessary information to resolve your complaint, which could include:
 - Bills from your previous supplier
 - Legal documentation
 - Tenancy agreements
 - Copies of cheques or bank statements

If you enter one of our surveys or competitions, we will collect the following:

- Your contact details

- Any information that you disclose to us in your responses

If you visit our website www.goeffortless.co.uk:

- Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to tell us how you're using our site, which in turn allows us to continually improve how the site works, looks and delivers information to users. We also use cookies to offer our website users a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- By continuing to use our website you are agreeing to our use of cookies as described in our Cookie Policy.

Information collected from other sources

We may obtain your personal data when you interact with us through third parties, such as price comparison websites and third party sellers.

Depending on the services you buy from us, we may also collect your personal data from sources such as credit reference agencies and industry data service providers.

If you have a smart meter installed in your property and it is being operated in smart mode, we will automatically collect information regarding your energy consumption.

Price comparison websites and third party sellers:

- Your personal data will be passed onto us from price comparison websites and third party sellers should you choose to interact with them to generate a quote, or open up an account with us.

Credit reference agencies:

- When you open up an account with us, your credit score may be provided to us by third party credit reference agencies.

Smart meters:

- If you have a smart meter installed in your property and it is being operated in smart mode, we will automatically receive readings in relation to your energy consumption. This will allow us to provide you with a number of benefits including accurate bills, and the ability to keep track of your energy spent.

Industry data service providers:

- If you're an energy customer, we'll receive information from national databases for the gas and electricity markets. This will include information such as unique identifiers linked to your meter and the location of the registered property.

How we use your personal data

We'll use your personal data for the purposes outlined below:

To fulfil our contractual agreement to provide you with our products and services:

- Where requested by you, to provide you with a quotation for any of our products and services
- To deliver our products and services to you according to our contractual agreement
- To manage the forecasting and calculation of consumption data and validate invoices
- To collect customer payments and manage payment plans
- To contact you with important information about your account, including bills and statements

To comply with our legal obligations, and for the establishment, exercise or defence of legal claims:

- To comply with our regulatory requirements, for example those under OFGEM such as Warm Home Discount, Green Deal and ECO.
- To meet our data protection obligations to verify your identity, before we provide you with information relating to your account
- To resolve any disputes relating to your service usage with us, or your previous supplier
- For the detection and prevention of crime, including any investigations into potential fraudulent activity, such as energy theft
- To ensure that your contact details are correct, so that we are able to comply with our requirements to update the Emergency Services database
- To respond to requests for information from the police and government bodies, to support in criminal investigations
- To offer a priority service for vulnerable customers, such as those with specific health or medical conditions

Where we have legitimate business interests:

- To respond to customer enquiries and complaints
- To manage payment schedules, credit levels and debt collection
- To understand customer behaviour, so that we can provide you with products and services that are best suited to your requirements

- For management information (MI) reporting purposes, to help us continually improve our offering to our customers
- To assess the financial vulnerability of our customers, so that we can ensure you are on the best plan for your individual circumstances
- Subject to your marketing preferences, to provide you with information about products and services that we think you'd benefit from, by post, telephone or by electronic means

Where we have your consent:

- To place you on our Priority Service Register
- To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences

Marketing:

If you are an existing customer, subject to your marketing preferences, or where you have otherwise expressly consented, we'll send you relevant information about products and services that we think you'd benefit from. This could include updates about more cost effective plans that we have identified for you, based on your usage.

We'll never sell your data to third parties for marketing purposes. However, subject to your marketing preferences, we may send you recommendations about third party products and services that could be of interest to you.

This information could be sent to you via text, telephone, email or post.

You can opt out or update your marketing preferences at any time by email or in writing using the following details:

Customer Services
Go Effortless Energy,
Chatterley Whitfield Enterprise Centre
Biddulph road
Stoke-on-Trent
ST6 8UW

contact@goeffortless.co.uk

Credit checks:

We may perform automated processing in the form of a credit check before we open up an account for you. We use credit reference agencies to confirm the following:

- That you live at the property you'd like Go Effortless Energy to supply
- The previous addresses you may have occupied
- Your credit score. This is calculated by credit reference agencies based on information including (but not limited to) your financial accounts, credit applications and insolvency related events.

If you are applying as an energy customer and you fail to pass our credit checks, we will ask you for a security deposit before we set you up as a customer.

For more information about your rights in relation to decisions which are made based on automated processing, please see the “Data Subject Rights” section of this Privacy Policy.

Call recording:

Calls may be recorded for training and monitoring purposes, and to assist us in the provision of our products and services to you. We also will retain these calls to keep a record of our contractual agreement with you, and to help us investigate any complaints or disputes.

Sharing your personal data

We share personal data with the following categories of third parties.

We never sell your data to a third party for their own marketing use.

- **Credit and Anti-fraud reference agencies**
 - Experian
- **Debt collection agencies:**
 - Blackthorne Utilities
 - 1st locate Leeds
 - Henriksen
 - MIL Collections
- **Industry partners:**
 - **To comply with financial audit regulations:**
 - Deloitte
 - KPMG
 - **To comply with Ofgem Smart meter installation requirements:**
 - National Grid
 - SMS
 - **Other energy companies, network companies and industry bodies:**
 - Other energy companies and industry bodies, including National Grid, as part of industry initiatives, the Theft Risk Assessment Service, or to help make it easier for you to switch suppliers
 - **The government or our regulators:**
 - Information Commissioner’s Office (ICO)
 - Office of Gas and Electricity Markets (Ofgem)
 - **Ombudsman services:**
 - If you raise a dispute or complaint and are eligible for review by an ombudsman service, like the Energy Ombudsman Service, we may share information such as your contact details, meter readings, equipment, and payments
 - **Network operators and distributors:**
 - National Grid
 - **New energy provider:**
 - A company you pick to provide energy services

- Companies that help us run our business, support our IT infrastructure and to further understand our customers:
 - TMA
 - Dyball Associates
 - SMS
 - Langley Foxall

We will also disclose your personal data to third parties:

- where it is in our legitimate interests to do so to run, grow and develop our business:
 - if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - if Go Effortless Energy or substantially all of its assets are acquired by a third party, in which case personal data held by Go Effortless Energy will be one of the transferred assets;
 - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- to protect the rights, property or safety of Go Effortless Energy, our employees, customers, suppliers or other persons.

Some of the companies with whom we share your data may use your data in countries which are outside of the European Economic Area. Please see the section below entitled "Where is my personal data stored?" for more detail on this aspect.

Any third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

Save as expressly detailed above, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent.

Where you have given your consent for us to use your personal data in a particular way, but later change your mind, you should contact us and we will stop doing so. You can opt out at any time by email or in writing using the following details:

Customer Services
Go Effortless Energy,
Chatterley Whitfield Enterprise Centre
Biddulph road
Stoke-on-Trent

ST6 8UW

contact@goeffortless.co.uk

Where is my personal data stored?

Go Effortless 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)

Security

Go Effortless Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with. We update and test our physical, logical and procedural security controls on an ongoing basis. These include limiting access to your personal data to those who need it and training our employees about the importance of maintaining the privacy and security of your personal data.

How long do we keep this information?

We'll only store your personal data for as long as is necessary to fulfil the purposes outlined in this Privacy Policy or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights. Your data will be retained in line with statutory and regulatory requirements. The criteria used to determine these retention periods includes:

- To comply with the minimum regulatory retention requirements as set by OFGEM and the Department of Energy and Climate Change.
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- To comply with the retention periods set by the TRAS Fraud Prevention Agency
- Where our retention periods are not governed by legislation, our retention policy is based on commercial justifications, which have been set in

accordance with the principle of retaining personal data for no longer than is necessary for the purposes for which it is processed. These include:

- To comply with our Supplier Licence Conditions
- To enable us to provide you with our products and services
- To allow us to resolve any disputes or complaints
- For the detection and prevention of fraud

Data subject rights

The following section sets out your rights in relation to your personal data. This includes your rights under the Data Protection Act, in addition to the enhanced rights that you will be entitled to post 25th May 2018, following the coming into force of the GDPR.

If you would like to exercise any of your data subject rights, please write or email using the following details:

Customer Services
Go Effortless Energy,
Chatterley Whitfield Enterprise Centre
Biddulph road
Stoke-on-Trent
ST6 8UW

contact@goeffortless.co.uk

You have various rights in relation to your personal information. These rights are as follows:

- **request access to your personal information** - you can request a copy of the personal information we hold on you;
- **request correction of your personal information** - if any personal information we hold on you is incorrect, you can request to have it corrected;
- **request erasure of your personal information** - you can ask us to delete your personal information in certain circumstances;
- **object to processing or restrict processing of your personal information** - you may object to our processing of your personal data in certain circumstances;
- **request the transfer of your personal information** - to provide you, or a third party you have chosen, with your personal information; and
- **withdraw consent where we're relying on consent to process your personal information** - if you withdraw your consent, we may not be able to

provide certain products or services to you. We'll advise you if this is the case at the time you withdraw your consent.

To exercise your rights in relation to your personal information, please email contact@goeffortless.co.uk .

You are able to exercise your rights free of charge, but if you make unfounded, repetitive or excessive requests, we may charge you to carry these out or refuse to act on such requests.

We'll try to respond to all requests within one month. If your request is complex or if you make lots of requests, we may extend our time to respond - if this is the case, we'll let you know.

Complaints

If you would like to make a complaint, please contact our Data Protection Officer:

Data Protection Officer
Go Effortless Energy,
Chatterley Whitfield Enterprise Centre
Biddulph road
Stoke-on-Trent
ST6 8UW

dataprotection@goeffortless.co.uk

You also have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office.

Changes to the Privacy Policy

This Privacy Policy does not form part of any customer's contract with us and we may amend it from time to time. Any changes we make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by email.

The practices described in this Privacy Policy are current personal data protection policies, as of 24th May 2018.