

Privacy Policy

Your privacy is important to us

This statement explains how we collect, use, transfer and store your personal data. We would encourage you to read this information.

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1. Important information and who we are

About this privacy notice

This privacy notice explains how Co-operative Energy Limited collects and processes your personal information. We would encourage you to read this information.

Who's responsible for your personal information?

We refer to Co-operative Energy in this statement. This means Co-operative Energy Limited, which is part of The Midcounties Co-operative Group. Co-operative Energy Limited is responsible for this website and is the 'data controller' for your data.

How can you contact us?

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Society's Data Protection Officer at data-protection@midcounties.coop or by writing to: Data Protection Officer, The Midcounties Co-operative, Co-operative House, Secretariat Group, Warwick Technology Park, Warwick CV34 6DA.

Other ways to contact us are on our [contact us](#) page.

If you do not think that we have processed your data in accordance with this notice you should let us know as soon as possible.

Who does this statement apply to?

- Individuals, sole traders and partnerships
- People we wish to promote products and services to
- People who contact us on social media
- People who visit our website

Changes to the privacy notice and your duty to inform us of changes

We may change this privacy notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Links to other websites

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. When you leave our website, we encourage you to read the privacy notice of every website you visit, particularly third party websites as we do not control those.

2. The kind of information we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** such as your name and date of birth. We need this and the Contact Data below to verify your identity and to enter into a contract with you
- **Contact Data** such as your address, email address and telephone number
- **Financial Data** such as your payment details and financial circumstances. We need your bank details if you want to pay by direct debit. We may check your credit history when you join us, buy an additional product or service or set up a direct debit. If you have difficulty paying our bills, then having details of your financial circumstances can help us to find a solution for you
- **Transaction Data** such as the following:
 - Details about your energy usage which you may give us, or which we obtain from your smart meter. You have a contractual obligation to provide us with details of your energy usage. We need this information to send you accurate bills. If we have to estimate your bills you may not be paying the right amount for your energy
 - Details of bills raised in respect of your energy usage and payments received
 - Details of energy you generate under the Feed in Tariff scheme. You're obliged to give us this information to help us manage your account
- **Vulnerability Data** such as information relating to your age, health, disability or financial circumstances. Having this kind of information helps us to provide you with appropriate services to keep you safe and to determine eligibility for a Warm Home Discount or any other payment or discount provided by government
- **Technical Data** 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
- **Profile Data** includes your account log in username and password, your interests, preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences

Apart from the Vulnerability Data referred to above, we do not collect any **Special Categories of Personal Data** about you (this also includes details about your race, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.

3. How your personal information is collected

We use different methods to collect data from and about you including through:

- **Direct interactions** you may give us your Identity, Contact, Financial, Transaction and Vulnerability Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply to become a customer of Co-operative Energy
 - create an account on our website
 - enquire about our goods and services
 - subscribe to our services or publications
 - request marketing to be sent to you
 - enquire about our community involvement
 - enter a competition, promotion or survey
 - give us some feedback
- **Automated technologies or interactions** as you interact with our website, we may automatically collect Profile and Usage Data. We will also collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources** we may receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services

- Identity and Contact Data from people moving in to or out of a property you're occupying, or a landlord
- Identity, Contact, Transaction and Vulnerability Data from other organisations involved in your energy supply which help us to manage your account
- Technical Data from the following parties:
 - a) analytics providers
 - b) advertising networks
 - c) search information providers
- Identity and Profile Data via Social Media channels

4. How we use your personal information

It's important that you understand what we'll do with the data that we hold about you.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- 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
- Where we need to comply with a legal or regulatory obligation. For example, we have to comply with the following:
 - Ofgem directions and Codes and our Licence Conditions
 - Financial Conduct Authority rules
 - Consumer Protection Laws
 - Orders made by a Court

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to the collection and use of Vulnerability Data and for sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enter into a contract with you, including the carrying out of a credit reference check	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage your account with us. This can include: (a) Providing our terms and conditions, recording your meter readings, sending you bills, administering your payments and dealing with queries or complaints. (b) If you move into a new property where we supply the energy, we'll link your personal details for the supply of energy at the new address.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
Obtaining information relating to age, health, disability or financial circumstances to determine whether we should add your details to our Priority Services Register and also your eligibility for Warm Home Discount or any other payment or discount	(a) Vulnerability Data	(a) Your consent (b) Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Keeping records of our dealings with you. (b) Monitoring and recording our conversations with you (we won't record credit and debit card details).	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests, including: <ul style="list-style-type: none"> • So that we have an accurate history of our relationship with you in case of disputes.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(c) Making appointments to read, inspect or change your meter.</p> <p>(d) Taking legal action against you if you do not pay our bills,</p> <p>(e) Analysing your consumption.</p> <p>(f) For research and insight purposes.</p>		<ul style="list-style-type: none"> • To prove you've agreed a contract with us, to help train our staff, or to help us give better service. • To ensure we are billing you correctly and your meter installation is safe and appropriate for your needs. • To enforce our rights. This might be to recover money due to us, to disconnect your meter or fit a pre-payment meter. • So that we can offer you tariffs that suit your circumstances and give you tailored energy efficiency advice to help you save money. • To enable us to provide good customer service.
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including monitoring and recording communications, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, quality assurance, training, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you or, for example, how you can save money	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

We won't use your personal data for marketing purposes at all if you've told us not to and we'll give you the opportunity to opt-out of receiving marketing information whenever we contact you directly for that purpose.

Third-party marketing

Sometimes we may want to share your information with other organisations, both within The Midcounties Co-operative Group and externally, for marketing purposes. Some examples are:

- Organisations that can enhance or match the data we hold with additional information to enable us to understand our customers better and plan marketing activities
- Organisations we want to work with to promote a joint product or a product or service we endorse

We will get your express opt-in consent before we share your personal data with any company outside The Midcounties Co-operative group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

Automated decision making and profiling

We use automated processing of personal data to evaluate, analyse and predict common traits, characteristics and behaviours. This enables us to understand our customer groups and manage these groups more effectively.

Segmenting customers lets us more effectively focus tailored marketing communications to specific types of customers in different ways.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Sharing your personal information

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal third parties** such as other legal entities in The Midcounties Co-operative Group who provide administrative services and undertake management reporting
- **External third parties** including the following:
 - Network operators, so they can keep you informed about reconnecting your energy if there's a loss of supply or an emergency
 - Agents appointed by us to facilitate our contract with you, such as Meter Operators and Data Collectors
 - Organisations that supervise or distribute data between smart meters, energy suppliers and other organisations that enable suppliers to bill customers for energy used and customers to switch between suppliers
 - Other energy suppliers, landlords or housing associations if we or another organisation suspects the property is connected with fraud
 - Another supplier you want to switch to
 - Other people where you have authorised us to or where they are named on your account as a secondary contact
 - Debt collection agencies and other organisations involved with debt collection (for example, bailiffs, law courts, private investigators) where charges are outstanding
 - Social services, distribution services or other agencies if we think you need extra help
 - Organisations giving you a service such as Green Deal (if applicable), helping you compare your energy use with similar households or offer you rewards
 - Organisations that provide outsourced printing, mailing and distribution services

- Organisations to whom we may outsource certain of our activities, such as call centre operations and checks to see whether your personal circumstances meet the vulnerable customer criteria
- Organisations doing research for us
- Market regulators such as OFGEM and consumer protection organisations such as the Energy Ombudsman and Citizens Advice Bureau
- Organisations for the detection, investigation and prevention of crime
- Commissioning and installation contractors for installations such as Solar Panels and insulation
- Financial organisations for purposes such as payment processing, finance plans and refunds
- Energy market administrators i.e. Xoserve for gas and the Meter Point Administration Service
- If you apply for Warm Home Discount, the Energy Saving Trust and Department for Work and Pensions to confirm whether you're entitled to the assistance
- Organisations, such as Effective Energy, that provide energy saving services as part of our Energy Company Obligation (ECO)
- Other FiT licensees if you want to transfer your generation unit(s) under the FiT scheme
- Credit reference agencies to see if you might have problems paying your bills. Credit reference agencies can also help us try to trace you if you've moved and we owe you money or you owe us money
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

6. Keeping your information secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, when you log in to your online account or ask us for a quote, our web pages are secure which means that your information can't be read by anyone who doesn't need to see it. When you get in touch with us, we'll ask you a couple of security questions before we share any personal details just to check it's you. We limit access to your personal data to those colleagues, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We strongly recommend that you do not disclose your Co-operative Energy account log in details to anyone. Please always remember to logout of your account when you have finished using our website.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Where you have an account with us we'll retain your personal data for 7 years following the end of our relationship with you (which might be when your account closes or when we've issued your final bill). There may be circumstances when we need to keep it for longer – for instance if we're dealing with a complaint from you - but we'll delete it as soon as we've no need to keep it further.

If we hold your data for any other reason we'll delete it as soon as we no longer have a valid reason to retain it.

8. Your rights

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the [Society's Data Protection Officer](#).

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints to the regulator

If you do not think that we have processed your data in accordance with this notice you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact them by going to their website at ico.org.uk, phoning them on 0303 123 1113 or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.