



# Data Protection and Privacy Policy



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## 1 Aim

- 1.1 We always put our customers first and are committed to building trust and confidence in the services we provide.
- 1.2 Key to building the trust and confidence of our customers is protecting their privacy and personal data and making sure we comply with all applicable data protection and privacy laws.
- 1.3 This policy sets out our approach to making sure we protect the privacy of your personal data and comply with all applicable data protection and privacy laws.

## 2 Scope

- 2.1 The policy explains when and why we collect personal information, how we use it and keep it secure and your rights in relation to it.
- 2.2 This policy applies to customers who own or occupy homes or properties connected to any of the heat networks that we manage and provide heat related services to, including metering and billing and planned, preventative and reactive maintenance.
- 2.3 Elements of this policy also apply to visitors to our website.
- 2.4 This policy applies to all contractors and other parties providing services on our behalf.



## 3 Policy Statement

- 3.1 We will;
  - Take our customers privacy seriously and take every reasonable measure and precaution to protect and secure personal data.
  - Make sure that all personal data is accurate and kept up to date.
  - Make sure that we do not keep any personal data longer than is necessary for the purpose that it is obtained.
  - Make sure all staff are trained, giving only those team members with the relevant training authorisation to access and process personal data.
  - Limit access to our customers personal information to those employees, agents, contractors and other third parties who need to know. They will only process your personal information on our instructions and will be subject to a duty of confidentiality.

## 4 Our Legal Responsibility

- 4.1 We will always comply with the General Data Protection Regulation (GDPR) when dealing with personal data. Further details on GDPR can be found on the Information Commissioner's website [www.ico.gov.uk](http://www.ico.gov.uk)
- 4.2 For the purposes of GDPR, Watkins Energy will be the "controller" of all personal data we hold about our customers.
- 4.3 We have notified the Information Commissioner's Office of our activities in accordance with current Data Protection Laws (registration number A8508799).

## 5 Definition of Personal data

- 5.1 When we refer to "personal data" we mean personal information which identifies you as an individual or is capable of doing so. This may include information such as your name, address or telephone number.
- 5.2 We're committed to providing you with a professional and personalised service, whilst at the same time safeguarding your privacy and protecting your personal data from unauthorised use or disclosure.

## 6 Special Category Data

- 6.1 Owing to the products or services that we offer, there may be times when we need to process sensitive personal information (known as special category data). For example, to be able to add you to our Priority Services Register we will need to know if you are registered disabled, of pensionable age, deaf, blind or have additional needs so that we can tailor our services and your customer experience to meet your needs.
- 6.2 Where we collect special category data we will request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so. Where we rely on consent for processing special category data, we will obtain explicit consent which can be modified or withdrawn at any time. We will action this immediately, unless there is a legitimate or legal reason for not doing so.

## 7 What Information Do We Collect?

- 7.1 We may collect information about you when you correspond with us by phone, letter, email, SMS or otherwise in the course of providing you with energy services.
- 7.2 We may collect information about visitors using our website. We collect information such as IP address, geographical location, browser type, referral source, length of visit and number of page views. This information helps us to produce anonymised data about browser behaviours. Our Website also uses cookies, for further information see section 15 below.
- 7.3 We may receive information about you from third parties, such as your landlord (if applicable) and credit reference agencies.
- 7.4 Information we collect on you includes, but is not limited to:
  - Name
  - Postal address
  - Phone numbers
  - E-mail addresses
  - Date of birth
  - Financial information (including bank account details)
  - Credit history
  - Information about use of our products and services, personal requirements and lifestyle.

## 8 How Do We Use Your Personal Data?

- 8.1 We will use your personal information in accordance with Data Protection Legislation and the terms set out in your Residential Heat Supply Agreement to:
- provide you with heating and hot water and support services, including metering and billing and maintenance and servicing,
  - provide you with access to relevant parts of our website,
  - improve our website and services to make sure you get the best experience possible, and
  - to help us prevent fraud.

## 9 How Will We Protect Your Personal Data?

- 9.1 We won't transfer your personal data outside the EU without your consent.
- 9.2 We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 9.3 We are cyber essentials certified which is a government scheme to ensure that the highest importance is placed on security and access to ours and your data. For more information please go to [www.cyberessentials.ncsc.gov.uk](http://www.cyberessentials.ncsc.gov.uk)
- 9.4 For any payments we take from you online we will use a recognised online secure payment system.
- 10.5 Where you're transmitting information to us over the internet this can never be guaranteed to be 100% secure, any information which you send to us is therefore sent at your own risk.
- 9.6 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 10 How Long Do We Store Your Data For?

- 10.1 Any personal data that we hold will only be stored for as long as we need it for the purpose it was originally intended. This will generally be for as long as we are your heat supplier and you have an account with us, or use our products or services, or the length of time required to meet our relevant legal data protection and privacy obligations.
- 10.2 Once it is decided that any personal data should no longer be retained it will be securely deleted.

## 11 Marketing and Market Research

- 11.1 Unless you ask us not to, we may contact you in writing, by phone and (where you have consented) via email and SMS, to conduct market research, which may include analysis of information not limited to energy usage, aspects of your lifestyle, and payment history, or to provide you with information on products and services that we offer where it is felt that it will be beneficial to you.
- 11.2 You may opt out at any time from participating in market research and/or receiving marketing messages by contacting us and letting us know.

## 12 Sharing Your Personal Data

- 12.1 Information you provide us may be shared with third parties, including:
- (a) companies that provide, review and/or receive services in relation to our website (if any) or our services or products
  - (b) regulators or legally appointed bodies, such as Ofgem, for regulatory or legal purposes
  - (c) where appropriate, individuals such as family members or cohabitants, previous tenants, landlords, or organisations such as letting agents, who/which may require, or provide, information about you or your home
  - (d) organisations involved in the prevention or detection of crime or collection of taxes or similar impositions. If we have a reasonable suspicion an offence is being, or has been, committed we will investigate and may record information

- on your account and share the information with relevant third parties (such as the Police)
- (e) if you fail to make payments, we may share information with debt collection and tracing agents, and
  - (f) authorised third parties or named account holders on any account you hold with us.

- 12.2 Your Heat Supply Agreement sets out in detail the terms on which we may share your personal data with third parties.

- 12.3 We work closely with third parties (including, for example Developers and Landlords) who may collect personal information from you and pass it on to us. Where this is the case, the third party is responsible for obtaining the relevant consents from you to ensure you are happy with the way in which your personal data will be used.

## 13 Recording and Monitoring of Telephone Calls and Communications

- 13.1 We may monitor and record your calls, emails, text messages and any other communications in accordance with UK law, for training purposes, to help improve our standards of customer service, to prevent or detect crime, or to meet our regulatory and legal responsibilities.

## 14 Cookies

- 14.1 So that we can provide you with a personalised browsing experience, our website uses 'cookie' information collection technology. A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser to help identify your computer's previous visits to the website, and to help us know what the most popular features of the website are.
- 14.2 We may use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website. We will use the persistent cookies to enable our website to recognise you when you visit.
- 14.3 Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.
- 14.4 We use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: [www.google.com/privacypolicy.html](http://www.google.com/privacypolicy.html)
- 14.5 Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party

cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

## 15 Your Rights and Updating Your Information

**15.1** Data protection laws provide you with various rights. In particular, subject to certain exemptions, you have a right to:

- request a copy of the information we hold about you.
- be removed from our marketing lists or change your marketing preferences.
- withdraw consent to our processing of your information (to the extent that such processing is based on consent) or otherwise object to our processing of your information.
- ask that we delete or correct the information that we hold about you.

**15.2** If you think the personal information we hold about you is wrong or out of date, you should get in touch as soon as possible and let us know so we can update it for you.

**15.3** To exercise any of your rights, update your personal information or if you have any other questions about our use of your information, please contact us.

**15.4** If you're unhappy with the way we've handled your information you have a right to complain to the Information Commissioner at [www.ico.org.uk](http://www.ico.org.uk)

## 16 Monitoring, Review and Evaluation

**16.1** As a minimum this policy will be reviewed once a year or in response to changes to applicable data protection and privacy laws.

## 17 Diversity and Inclusion

**17.1** We are committed to valuing and promoting equality and diversity and will treat all customers fairly and with respect.

## 18 Associated Documents

- Residential Heat Supply Agreement
- Cookie Policy

### Policy Statement Owner

Victoria Keen, Director

### Approval date

1 6 0 1 2 0 2 1

### Date of next review

1 5 0 1 2 0 2 2

# Contacting us

Whatever you need, we're here to help.

Get in touch today to talk to one of our friendly Customer Care Team



**0330 324 0018** (local rates apply)  
Monday to Friday 8am - 5pm



[help@watkinsenergy.co.uk](mailto:help@watkinsenergy.co.uk)



[www.watkinsenergy.co.uk](http://www.watkinsenergy.co.uk)



By writing to us at;  
Watkins House, Leigh Road, Haine Business Park,  
Ramsgate, Kent CT12 5EU

For more information about our services check out our website which has lots of useful information, tips and answers to frequently asked questions.

