

CUSTOMER PRIVACY NOTICE
(INCLUDING WEBSITE VISITS)

We are registered with the Information Commissioner as a Data Controller. In light of the new European Data Protection Regulations, we are taking this opportunity to re-affirm our commitment to taking your privacy seriously and to assure you we will only use your personal information to administer your account and to provide the energy supply to your site(s).

The information you provide/have provided will be treated confidentially and accessed or disclosed to relevant people or agencies essential to supplying electricity to your site(s).

Meaning of Personal Information

Personal information/ data means information relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller. The information we ask you to provide include:

- Your name
- Contact numbers
- correspondence address
- Supply site address
- email address
- Supply MPAN numbers
- your estimated consumption details
- information for the direct debit scheme (where applicable)
- Bank details (where applicable)
- Related matters necessary to fulfil our obligations under the contract.

Collecting Personal Information

We collect your personal information before or when we enter into a legally binding contract with you or when we supply you electricity. During the supply period we also collect consumption usage information from your meters to generate bills based on actual or estimated use.

We may collect your personal information by paper, email, via our website, phone conversations, CCTV and/or face to face meetings and via a third party (e.g. a broker), in-house or third party credit rating provider.

Reasons for Collecting Your Personal Information

We collect personal information about you and your business for a number of reasons:

- To fulfil our part of the contract with you
- To undertake changes of tenancy
- To confirm your identity
- To contact you by email, phone and post
- To process financial transactions
- To maintain and repair the electricity supply meters and ensure their proper working
- To share some information with third parties within the energy industry to supply the electricity you requested from us
- To detect, and prevent electricity and energy theft in the industry
- To understand your needs to provide the service and inform you of relevant services
- To comply with the requirements of relevant laws, our licence conditions and regulatory requirements.

We may not be able to supply you with electricity unless we have enough information or your permission to use the required information.

How We Use Your Personal Information

We will use your information in a way that is consistent with the data protection rules. As set out in our customer terms and conditions we use your personal details to supply electricity to your site(s). We will process your information for a number of reasons:

- For the purpose of supplying you with electricity and to ensure that the correct supply is provided
- To enable us to comply with our contractual, legal and regulatory obligations
- For law enforcement purposes, where it is necessary
- To prevent and detect energy theft
- To process payments and financial transactions
- To collect bill payments and collect money owed to us
- To enable us to investigate any complaints fully
- To protect individuals and sites from harm and injury, where necessary
- To allow us to communicate and provide services and supply relevant to your needs
- For research and statistical analysis so we can plan our services and complaints monitoring

Sharing Information

In order to supply you with electricity or due to legal or regulatory reasons, we need to pass relevant information about you to other people and organisations. Under the data protection rules these providers are obliged to use your information safely for the purpose of your request. The key third party organisations that could have access to your information are Data Network Operators (DNOs), Data Aggregators, Data Collectors, Meter Operator Providers (MOPs), Local Network Operators, Data Collection Company (DCC), National Grid, Elexon, Meter Repair, installation and maintenance companies, brokers, your old or future supplier, Police and TRAS (the energy theft detection agency), debt management agencies, direct debit scheme providers, where requested the Citizens Advice and the Energy Ombudsman, the Information Commissioner, ECOES, Government Departments, Ofgem.

Your personal information will not be disclosed to third parties unless there is a valid and legitimate, legal, contractual or regulatory reason for the disclosure. We do not sell personal data to third parties.

Transferring Information outside European Union/ Overseas

We will only transfer your personal information overseas where we are required to do so by the law or regulatory requirement. However, if there are other non-legal, regulatory or contractual situations where there is a specific requirement to transfer your personal details your consent will be sought first.

Storing and disposal of your Personal Information

The personal details we have about you is administered by our staff at MA Energy. When you enter into a contract with us or there is a change of tenancy our staff store the information into our electronic management and billing systems and into the relevant industry systems (e.g. as data flows). We also save our documents in secure backup systems. The hard copies are kept in secure files within our offices.

We only keep your information for as long as it is needed after which we safely dispose of the details. In so doing we ensure that effective safeguards are in place. We make sure that staff handling your information are authorised for the specific task. We have processes in place to monitor and deal with unauthorised access to information. We will safely dispose of your personal information when it is not needed.

Respecting Your Privacy on Our Computer Network

Our computer network systems have various process and procedures that limit who can access what sections and data. We have software and policy and procedures in place to address any unauthorised access in terms of prevention and detection of unauthorised access and remedial action.

Visiting our Website

Our website automatically logs information about your visit such as your browser type and the length of your visit. We use this information to understand how visitors interact with the site so we can make informed decisions about design and other improvements. Our website does not collect personal data about you.

Communication with You

Communicating would include sending you monthly bills and invoices, revised bills and final bills, notice of changes to our terms and conditions, relevant updates or updating your details, contacting you to comply with regulatory obligations as such sending you copy of the renewal letter before the end of your fixed term contract, first contact letters (if applicable), notifying you of any potential or actual breaches of your contract and change of circumstances.

If you are our customer and are both a bill payer and occupier of the premise we can provide full details to you. However, if you do not occupy the premises (e.g. you are a landlord) and only pay the bill/ invoices we would provide reasonable details to enable you to make payments with the required details (unless we have written authorisation from the occupier to disclose detailed information).

We aim to be discreet in responding to your enquiries. We also endeavour to protect your confidentiality when dealing with any questions you raise including during telephone calls and emails.

If you email us, we may store all or part of the details from them on our computer systems. We do not routinely retain all emails we receive.

When we speak with you on the telephone we may need to ask you some security questions to check who you are. It may be necessary for us to ring you back or for us to respond to you in writing in order to safeguard your information.

Where there is audio recording of conversations, this would be used to increase your security, for our record keeping of the conversation and for staff training purposes (where appropriate).

CCTV/ Monitoring

We have installed CCTV systems in and outside our premises used by staff and visitors for the purpose of safety and security, crime prevention and detection.

Images captured by the CCTV will not be kept longer than necessary. However, on occasions there may be need to keep the images for longer, for example, where a crime or an incident is being investigated.

Customer Feedback

We welcome comments and suggestions from customers. Customers can send comments via letter, telephone or by email.

Access to Your Personal Information

We will try to ensure they are correct. However, in some situations where you find the information we have is not accurate you have the right to have them corrected.

Providing there are payments or debt on your account you have the right to have any personal information removed from our system and records, otherwise the details will remain in line with our data retention policy and legal requirements then disposed safely.

Right to Object to Processing your Information

You also have the right to ask us to stop processing your personal information. However, such a request may delay or stop us from supplying you electricity. Where possible we will seek to comply with your request but we may be required to hold or process the information to comply with your contractual request or to comply with a legal or regulatory obligation.

For further information or if you want to exercise any of your rights please contact:

MA Energy Ltd
45 Skylines Village
Limehabour
Docklands
London E14 9TS
Email: enquiries@maenergy.co.uk
Tel: 033 33 44 55 12

How to Make a Complaint to us

When we receive a complaint from a person we create a file containing the details of the complaint. This normally contains the identity of the complainant and other persons involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide and for statistical/ monitoring purposes.

Changes to our Privacy Notice

We will be reviewing this notice from time to time to reflect changes in the law and good practice. When we make these changes, we will place the revised versions on our MA Energy website for public access.

22nd February 2018