



Privacy Policy

Version 2.5

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1. Pure Planet and your Personal Data

- 1.1. Pure Planet Limited (“**we**” or “**Pure Planet**”), with registered business address: Cramer House, The Square, Lower Bristol Road, Bath, BA2 3BH is the data controller responsible for processing your personal data, as defined in the General Data Protection Regulation (“**Personal Data**”), **which in essence means information which could identify you as an individual.**
- 1.2. This Privacy Policy explains how Pure Planet collects, shares and uses your Personal Data.
- 1.3. We respect your right to privacy and will only use the Personal Data which you give us, or which we legally receive from another organisation or person as allowed by the General Data Protection Regulation 2016, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any other applicable privacy laws.
- 1.4. As indicated in your contract with us, we need to process your data in order for us to supply you with your service. We will ensure your Personal Data is:
 - 1.4.1. collected in a fair and lawful manner and used only for specified purposes;
 - 1.4.2. adequate, relevant and not excessive for the purpose for which it was collected;
 - 1.4.3. accurate and up-to-date (although you must notify us of changes to your Personal Data);
 - 1.4.4. secure at all times; and
 - 1.4.5. kept no longer than is necessary and disposed of appropriately when no longer required (e.g. at the termination of our business relationship, subject to our need to retain Personal Data for legal reasons).
- 1.5. We will:
 - 1.5.1. take appropriate technical and organisational measures against unauthorised and unlawful processing, accidental loss, destruction or damage to Personal Data;
 - 1.5.2. only pass your Personal Data onto another organisation if we need to for the purposes of providing our products and services and feedback on how we provide those services, have lawful business grounds to share your Personal Data with them or are required to share your Personal Data by law or regulation. Appendix 1 sets out the types of organisations with whom we may share your data and the reasons for doing so.
- 1.6. We may collect the following information about you and other members of your household:



- 1.6.1. your personal details including name, home address, date of birth, mobile number and email in order to contact you regarding your quotation, your energy account and to provide the services to you. We may also provide you with information about other services and which you might be interested in, depending on your marketing preferences;
 - 1.6.2. any vulnerability you or anyone in your household may have regarding our service (e.g. your physical and mental health) - additional detail is provided in the section titled "Priority Services Register" below - in order to ensure we can provide you with a suitable service and to fulfil our obligations under our licence conditions;
 - 1.6.3. your bank account details if you become an energy Member in order to collect payment for our services to you;
 - 1.6.4. your meter details, your energy consumption and spend in order to ensure we keep a record of your usage, for statistical analysis and provide the service to you;
 - 1.6.5. records of our interactions with you and your interactions with us in order to ensure we provide you with a good service, to help us improve our service to you and all our Members and in case it is required as evidence of our dealings with you;
 - 1.6.6. information about your address (for example it's age, number of bedrooms) for energy forecasting and energy advice in order to provide you with a better service; and
 - 1.6.7. information about you and other people living at the property for assessing vulnerability in order to provide you with the right level of service and to fulfil our obligations under our energy supply licence conditions.
- 1.7. If you provide information on behalf of anyone else then when you do so you are confirming that you have provided them with the information in this document and that they have given you permission to use the data as we have set out. If you have provided any Sensitive Personal Data about yourself or others (such as health related information) you agree (and are confirming that the person to whom the information relates has agreed) that we can use the information as set out in this notice.
 - 1.8. We may share your Personal Data with others in order to provide services related to your supply, such as smart meter installations.
 - 1.9. In general we and others acting on our behalf may collect, store and use the Personal Data listed to:
 - 1.9.1. help us identify you;
 - 1.9.2. supply you with the services you have asked us for;
 - 1.9.3. set up and manage your account including loyalty and incentive schemes, assessing your creditworthiness, collecting payments, recovering debts;
 - 1.9.4. send you notifications via our app about your energy consumption, the price you pay and service messages such as meter read and payment collection reminders;





- 1.9.5. create statistics, run reports and analyse aggregated, anonymised information for the purposes of providing a more efficient service; understanding energy usage and efficiency and how it varies over time;
 - 1.9.6. monitor and record our communication with you to run your account, improve our services and where necessary, provide evidence or verification of transactions or events.
- 1.10. We, or a third party with whom we share Personal Data, may host, store and handle that data outside the European Economic Area (EEA). We will only permit this to happen if adequate safeguards have been put in place to protect your Personal Data. This means that we will:
- 1.10.1. ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission under Article 45 of the General Data Protection Regulation (GDPR);
 - 1.10.2. include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR); or
 - 1.10.3. (in the case of transfers from the EEA to the USA), ensure that the recipient of the personal information is certified with the US-EU Privacy Shield Framework, as permitted by Article 46.2 of the GDPR.

2. Your energy account

- 2.1. This Privacy Policy forms part of our Energy Terms and Conditions. We may need to disclose Personal Data in order to provide you with a quote, energy supply and service, as set out in Appendix 1.
- 2.2. For service messages, and in order to provide you with your energy service, we may communicate with you by app notification, text message, mobile phone, email and in writing.
- 2.3. For marketing messages we may communicate with you by app notification, text message, phone, email and in writing in order to provide you with information about other services which you might be interested in, depending on your marketing preferences. You can opt out of marketing messages (via text, phone, email and post) such as loyalty rewards and special offers, when you sign up or at any time by tapping 'Account' and then changing your marketing preferences in your account. You can turn off app notifications via the app.
- 2.4. If you no longer have an energy account with us we may still keep your information but only insofar as it is necessary for business, tax, legal and regulatory purposes.



3. Your smart meter data

3.1. From the date your smart meter is installed (or the date we are able to utilise the functionality) we will use the smart energy consumption data we obtain remotely from it for the following purposes:

	Monthly	Daily	Half-Hourly
So you receive an accurate bill based on your actual use.	✓	✓	
So you get detailed tracking information in your account about your energy use and spend, with interactive tools to help you control your energy consumption and costs.	✓	✓	✓
So we can spot trends and innovate to bring you better products, prices and services. We will only use your energy data for marketing purposes in accordance with the marketing preferences you set with us (see further section 2).	✓	✓	✓
So we can provide energy anonymised usage statistics for industry purposes in line with regulation.	✓	✓	✓
So we can run checks and fix any faults with your meter quickly and with minimum disruption to you.	✓	✓	✓
So we can accurately forecast the energy you're going to need and secure it at the best possible rate in the market.	✓	✓	✓

3.2. The minimum level of data we are allowed to collect for billing and regulatory purposes is monthly. We are allowed to take ad hoc daily readings to maintain accurate billing where we need to update your Account or answer any queries you have.

3.3. We will collect your smart energy data on a daily basis when possible. You will have the right to opt out of this, in which case we will collect the minimum data of once a month. You will be able to do this at any time via your account when the functionality is available. We will not collect this data before this functionality is available.

3.4. If you choose, we will collect your energy data half-hourly. We will do this once a day by downloading the data from your smart meter. We will only use that data for the purposes we tell you about and what you have consented to when signing up to our service. We will not collect this data unless we have your consent to do so.



- 3.5. If you decide you want to change how frequently we can collect your energy data, you will be able to do so in the app. That change will take effect at midnight on the day you instruct us. A smart meter is only able to store a limited amount of data, so if you change your level of consent to allow us to collect more energy data we may not be able to provide you with any historic information to that detail.

4. Links to external information

- 4.1. From time to time our website, our Community site, our blog posts and our communications with you may include links to websites which are created by individuals and companies outside of Pure Planet. We do this when there is a particular relevance to the topic you're reading about and the site we take you to.
- 4.2. While we endeavour to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, nor the integrity of the content contained within them.
- 4.3. On our community and social pages members are able to post links freely and Pure Planet does not actively monitor these links for suitability.

5. Priority Services Register

- 5.1. If you tell us, or we believe that you or another member of your household are in need of extra care, we will record that information and store it on our Priority Services Register, in order to ensure you get the service you need. This is in line with Energy UK's 'safety-net procedures'. To find out more, tap 'Help' in your account or visit our Website.
- 5.2. If you elect to go on our Priority Services Register we will use your Personal Data to enable us:
- 5.2.1. to consider what additional help and support we can provide you;
 - 5.2.2. to tell the electricity and gas transporters so they can tailor their services to you;
 - 5.2.3. to commission contractors such as meter reader to provide extra help;
 - 5.2.4. to work with trustee charities to make sure we safeguard you and help in incident situations;
 - 5.2.5. to share this if you move to another energy company so they are aware of the support you need.
- 5.3. We will never use this register for marketing. You can update your status on the Priority Services Register at any time.
- 5.4. Whether or not you are on our Priority Services Register, if we believe you need extra care or are in danger of being cut off, we will record that in our information and may share it with the relevant healthcare organisations.





6. Talk to us

6.1. You have the following rights in relation to the Personal Data that we hold about you:

- 6.1.1. The right to be informed about how your Personal Data is being used;
- 6.1.2. The rights to access the Personal Data we hold about you;
- 6.1.3. The right to request the correction of inaccurate Personal Data we hold about you;
- 6.1.4. The right to have your Personal Data erased;
- 6.1.5. The right to restrict the processing of your Personal Data;
- 6.1.6. The right to obtain and reuse your Personal Data for your own purposes;
- 6.1.7. The right to object to the processing of your Personal Data;
- 6.1.8. Rights in relation to automated decision making including profiling.

Some of these rights are available only where certain criteria are met, that is, they are not absolute rights. You can speak to us about any of these rights at any time. To exercise any of the above rights or if you have any questions, please contact us by using the details below in section 6.3.

6.2. To see the Personal Data we hold on you, and to ask us to update your Personal Data at any time, you can submit a Subject Access Request to us at our business address, or the email address detailed below. We will assist in updating any Personal Data you consider to be out of date.

6.3. If you have any questions about this Privacy Policy or any complaints about our handling of your Personal Data, please contact us by mail, email or through your account using the below contact details:

- 6.3.1. Tap 'Help' in your account;
- 6.3.2. Email our Data Protection Officer at: help@purepla.net ; or
- 6.3.3. Write to us, marked for the attention of the Data Protection Officer, to our business address at Cramer House, The Square, Lower Bristol Road, Bath, BA2 3BH.
- 6.3.4. You have the right to make a complaint about our handling of your Personal Data. If you wish to do so without talking to us first, please contact the UK Information Commissioner's Office. Its website is www.ico.org.uk.



Appendix 1 - Third parties with whom we may share your data

We want to be clear and transparent about the ways in which we share your Personal Data with third parties. The table below sets out the types of third party organisations with whom we may share your data.

Third party type	Reason for sharing data
Our service providers who process Personal Data on our behalf	We will share information with our service providers and service partners so that they can assist us with providing our services to you, model and analyse data on our behalf and to test and develop our systems. These service providers will use your Personal Data in accordance with our instructions.
Our Direct Debit payment processor	We use GoCardless to process your Direct Debit payments. More information on how GoCardless processes your personal data and your data protection rights, including your right to object, is available at gocardless.com/legal/privacy/
Other payment processors	We may, from time to time, use other payment processors to collect one-off payments or cash payments. We may share your Personal Data with these payment providers for the purpose of collecting and processing these payments. We currently use Elavon, SagePay and Global 365 as payment processors.
Network operators and metering service companies	To enable the repair of broken or faulty equipment, the installation of new equipment, and to ensure an appropriate service is provided to our vulnerable members.
Credit scoring and debt collection agencies	To establish your creditworthiness, for credit control purposes and to pursue debt on our behalf if you do not pay a debt owed to us.
Service feedback	To help us better understand how our Members feel about the level of service we provide and to collect feedback on those services, we may share your personal data with third parties to collect reviews of how our Members believe we are doing. Specifically we may ask our Members to complete a TrustPilot review.
Rewards partners	If you participate in any of our reward offers and promotions, we may share your personal data with third parties in order to provide you with the reward or offer. Your data is provided to rewards partners for the sole purpose of the voucher redemption process. Rewards partners will not use this data for any other purposes, including business development, save for



	financial reconciliation, customer service, analysis and fraud detection/analysis
Law enforcement and government agencies	If we suspect fraud or theft or other illegal behaviour relating to your account we may report our suspicions to relevant law enforcement and fraud prevention agencies. We will share personal data with government agencies where required by or permitted by law.
Our regulators and relevant industry organisations	Such as Ofgem where required by law or where lawfully permitted to do so as part of industry initiatives (e.g. as part of a government data sharing initiative).
Commercial service providers	We may share anonymised and/or pseudonymised data in compliance with the GDPR, with third parties in order to improve our services. We will only share aggregated data for this purpose under the terms of the GDPR and in a manner which does not constitute Personal Data.
Advertising platforms	We use third-party service providers (Facebook, Google, 59a) to serve ads on our behalf across the internet. These advertisers use cookies or anonymised and / or aggregated data to help us reach more prospective Pure Planet members.
User experience platform	We use Hotjar to see how people interact with our site and app. Data is anonymised.