

Purely Energy Privacy Policy

Your information will be controlled and processed by Purely Energy Ltd.

You can contact us with any questions, comments or requests you may have regarding this privacy policy using the details below:

Address: Compliance Manager, Purely Energy Ltd, 4 Rylands Street, Warrington, WA1 1EN.

Phone: 0161 521 3400

Email: admin@purelyenergy.co.uk

If you are unhappy with how we have used your personal information, you can contact us using the details above and we will investigate and provide a response to you. If you are still unhappy with the outcome of the complaint, you have the right to complain to the Information Commissioner's Office, you can report a complaint [here](#).

This privacy notice is to explain how Purely Energy Ltd promises to protect and use your personal information. This includes anything you may have told us yourself, what we may learn during the course of your interactions with us, what we learn about you from other parties, and your marketing preferences. This privacy notice also outlines your rights and how the law affects you. We will:

- Keep your data safe and secure.
- Allow you to manage your marketing preferences with us.

1. Information we may collect from you

During the course of our relationship with you, we may need to collect and process data about you. The types of data that we will require will fall broadly into one of the categories below:

Type of Personal Information	Description
Contact	Name, telephone, address, email address and how to contact you
Financial	Bank details, credit information, personal financial status relating to all directors and proprietors
Public	Details from the electoral register, companies house, and other information publicly available about you or your business
Permission	Permissions you have granted us to use your data, primarily for marketing purposes
Documentation	Data stored in documents you have sent us, such as bills and contracts from suppliers to enable us to help you switch, or leases to prove change of tenancy where required.
Technical Data	The types of equipment and software, IP addresses, geographical location, operating system and browser type you use to access our online services where available.
Analytics	Data that tells us how you have navigated across our websites, selected certain preferences on our website, what number you called us on, how long you called us for and the reason for the call etc.
Product Specific	Details about the products you have taken, what you are interested in, whether we've discussed certain products with you previously.

We will collect this data during the course of business by one of the following methods:

- When you fill out forms on our website or our partner's sites that we provide services for (partner websites will inform you if they pass your information to us).
- When we communicate with each other by post.
- When we talk with each other by telephone.
- When we communicate with each other by email.
- When we communicate with each other by instant messaging.
- When you visit our sites and navigate around the web pages.
- From completed surveys we send you from time to time.
- From subscribing to our newsletters, white papers or other such communications.
- From your interaction with our social media accounts.

In the cases where we are in the course of arranging a contract for you, or have arranged a contract for you in the past, we will also receive data about you via the following methods:

- Details about your energy supply from your energy supplier(s).
- Details about your current and past financial services products from your financial service provider(s).
- Credit reference agencies (eg. Experian and Equifax) where required to arrange certain contracts with certain suppliers.
- GB Group.
- Fraud prevention agencies.

- Publicly held information from Companies House or the Electoral Register.
- Companies that introduce you to us or where we have introduced you to another company.
- Companies that provide data services that will enable us to gather information about your business.

2. How we use your information and why

We are required to ensure that we are processing data under one of the following legal bases:

- In order to fulfill a contractual requirement with you.
- We have a legitimate interest in processing your data, given due regard to your interests, rights and freedoms.
- You have provided us with consent to process your data.
- We are required to fulfill a legal obligation.
- We are required to process your data in order to protect yours or another person's vital interests.
- Processing is necessary for the performance of a task in the public interest.

Our primary purpose for using your data is to help you switch provider and get you a better contract for your business essential services, so using that as an example, we will process your data in order to fulfill our contract we have agreed with you.

Below is a list of how we process personal data, why we do so and the legal basis under which we are operating:

How we use your personal information	Why	Legal basis for processing
To agree a contract on your behalf with an energy supplier, or connectivity supplier	We will have agreed a contract between us to achieve this on your behalf	Contractual
To search our panel of suppliers in order to obtain the best quotes available to you	We will have agreed a contract between us to achieve this on your behalf	Contractual
To validate your data against other sources and ensure your information is accurate	To maximize the chances of your agreement going live with the supplier	Legitimate Interests
To improve our services and provide you with better products	Allows us to develop better processes, making it easier for you to access and use our services	Legitimate Interests
To research market trends, customer demographics etc.	Allows us to develop profiles of our customers base, develop better processes, making it easier for you to access and use our services	Legitimate Interests
To communicate with you about your contracts and agreements we have arranged	To ensure that you are aware of key dates and requirements of the contracts we have agreed on your behalf with our panel of suppliers	Contractual
Contacting you about renewal quotes for the contracts we have arranged	To ensure that you don't end up paying out of contract rates, and as to ensure your energy supply contracted rates do not lapse	Contractual and legitimate interests*
To send promotional material to you	To provide you with details of services that we believe could save you money	Consent
To send market research/customer sentiment surveys to you	Help us develop and improve our services	Legitimate Interests
To perform sanctions/fraud checks	To ensure that we haven't sold a product to someone who has sanctions on their account or provide products to customers who may be using fraudulent personal details.	Legal obligation
To perform credit searches	To detect any financial problems customers may have, detect fraud, manage risk and ensure that customers are given the best products to suit their needs	Contractual, Legal Obligation, Legitimate Interests*
To manage fees and recover money that is owed to us	To ensure any commission we are due from suppliers, or fees due from customers are paid in full	Contractual, Legal Obligation, Legitimate Interests*
To test our systems, ensure our business is running efficiently, managing communications, our financial reconciliation is performed, audit processes, filing obligations to regulators	We have numerous obligations we need to comply with to ensure that we are running our business in a correct and compliant manner, from tax legislation, regulatory and legal requirements and annual filing obligations to bodies like the Financial Conduct Authority.	Contractual, Legal Obligation, Legitimate Interests*
To train our staff and ensure that compliance and quality are monitored within the company	All calls into and out of the business are recorded. We use these calls to monitor the quality of our service and ensure that we are hitting regulatory and legal standards during our sales and customer service process. Certain phone calls such as insurance and energy verbal contracts are required to be recorded to ensure we have proof of a contract between you and a supplier.	Contractual, Legal Obligation, Legitimate Interests*
To identify your business from partial information you have provided online	Our online application forms gather information about your business, where a customer has only partially completed the form, we will validate the partial information and may contact you using that information.	Legitimate Interests
To provide third parties with information about you	If you have been introduced to us by a third party, we are required to report back to that third party if you have taken an agreement out through us, additionally we may use third party companies in the course of arranging a contract for you, please see who we share your information with section for further details.	Contractual

*Each process will only operate under one of these legal bases, these are provided to show under what legal bases the various processes we have in our company could be operating under.

3. Who do we share your information with?

When you use our services, agree a contract with a supplier or talk to us about the services we offer we may share your information with the third parties below.

If you would like to know who your information has been shared with in the course of arranging your contracts, then you can request this information at any time.

Suppliers;

Energy

When arranging your energy supply we will provide data to one or more energy suppliers (e.g. British Gas, Scottish Power, Pozitive Energy, Smartest Energy) in order to provide a quote and ultimately to arrange an energy contract for you.

Partners

We have agreements with partners who can't provide switching services for businesses and so will refer customers to us to complete customer's requests. If you have been passed to us via a partner, we will share information about your sale back to the partner in order to pay their referral fee.

General Business

Outside companies we may use in order to develop our products, provide analysis, improve our services to customers, or give advice to us. These could include:

Market researchers

These firms may get in touch with you on our behalf to ask you for your opinions and feedback. These firms may then use the information you provide them and cross-reference that data with other sources they may have in order to build a picture of our customers and how they use our products. They will then provide us with analysis and advice, so we improve our products and services and help us to be better at serving you.

Advisers

This could be our solicitors, IT suppliers, consultancies. They are likely to provide us advice, and in order to give us the best advice may well require access to personal information.

Advertisers and analytics providers

These firms, such as Google, Facebook or Twitter, may be given limited information about you if you consent, in order to display targeted relevant messages to you and others about our services.

Other Third Parties

In order to provide our services, we use the services of other third-party companies in order to maximise the probability of your contract going live, or because we have a legal requirement to adhere to e.g. sanctions searches and anti-money laundering legislation.

All of these third parties are strictly forbidden from using your data for any purpose other than those disclosed above, all third parties are rigorously checked out before sharing information with them and are held to the highest standards once they are working for us.

Some third parties are not based in the UK or EU, where that is the case, we have put in place contracts that ensure they protect your data to the same standards as the UK and EU.

3. How long we keep your information

We will keep your personal information for as long as you are a customer of Purely Energy.

As your contract ends and you no longer wish to use Purely Energy's services, we may be required to keep your data for up to 10 years after you stop being a customer. During that time, we could use your data for the following processes:

- To respond to a question or a complaint
- To prove that we have arranged valid agreements to our suppliers

- To analyse historical trends, perform internal research or develop our products and services
- To obey tax or anti-money laundering rules around record keeping
- To keep insurance data for employer's liability claims

We commit to keeping your data safe and secure during this period and will ensure your privacy is protected.

4. Your Legal Rights

Under the Data Protection Act 2018 you have the following rights, this section explains what they are and how they work:

The right to be informed

We will always explain to you how we are going to use your personal information when you take a contract with us, this could be as part of your application process or asking how you would like to be marketed to but will also be set out in the terms and conditions of your agreements with us and within this privacy policy.

The right of access

You are entitled to request the personal information we hold on you and how we have processed that information. You can do this simply by contacting us via email, letter or phone and we will respond within 30 days. Additionally, you have the right to certain information in a digital format for your own personal use. Please let us know that you would like this option at the point of requesting your personal information.

The right to rectification

If you believe that any of the personal information we hold is incorrect or out of date, please contact us and we will correct it for you.

The right to request we stop processing your information, object to us holding it or delete your information completely

You can ask us to delete, remove or stop using your personal information if there is no reason that we should be holding it or processing it. As stated above, there may be a contractual agreement in place, or we have a legal obligation to process or store your data, and in these circumstances, we will explain whether we can delete your data or stop processing it, this will not be on all occasions. Broadly speaking, where we have

asked for your consent to process your data e.g. Sending marketing emails, you can withdraw your consent at any time to that sort of processing; or where we are acting under legitimate interests, you will be able to request we stop processing. We will review any request under these rights and provide you with an answer either agreeing to your request or explaining why we can't.

Our site also contains links to and from the websites of our partner networks, suppliers and affiliates. If you follow a link to any of these websites, please note that they will have their own privacy policies and that we do not accept any responsibility or liability for these policies or data activities on such websites. Please check these policies before you submit any personal data to these websites.