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## PRIVACY NOTICE

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### BACKGROUND:

Cielo Energy Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

Cielo Energy Ltd.

registered in England under company number 11992760.

Registered address: 2 Almond Avenue, Leamington Spa, CV32 6QD

Main trading address: 12 Hamilton Terrace, Leamington Spa, CV32 4LY.

VAT number: 324 1425 40

Data Protection Officer:.

Email address: info@cieloenergy.co.uk.

Telephone number: 01926 298 116.

Postal address: 12 Hamilton Terrace, Leamington Spa, CV32 4LY

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in

Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. we do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

Depending upon your use of our services we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name and title	Your contracts with us or through our use of approved marketing agents.
Contact information including address, email address, telephone number.	Your contracts with us or through our use of approved marketing agents.

Business information including business name, job title, profession.	Your contracts with us or through our use of approved marketing agents.
Consumption or production data and MPAN / MPRN data.	Information provided to us by you or third parties as part of a contract..

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Contact data, consumption or production data.	Legitimate interests in providing services to you and charging for our services.
Supplying our products and services to you.	Consumption or production data and associated MPAN / MPRN data.	Legitimate business interests to provide you with advice and support.
Personalising and tailoring our products and services for you.	Consumption or production data and associated MPAN/ MPRN data.	Legitimate business interests to provide you with advice and support..
Communicating with you.	Consumption or production data and associated MPAN / MPRN.	Legitimate business interests to advise you and support your business, and to invoice for our advice.
Supplying you with information by email or post that you have opted-in-to (you may opt-out at any time by emailing us.	Contact data.	Legitimate business interests to update you on our services or market updates that may be of interest.
Obtaining quotes for and placing contracts for energy supply / purchase on your behalf.	Contact data, production or consumption data.	Legitimate business interests to share the data with chosen partners to secure a contract for your business.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone or text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **[[We] OR [I]** will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.]

- The following automated decision-making method(s) may be used:
  - Credit checking your business prior to any quotation or contract commences.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information	No longer than required for us to comply with legal requirements or 6 years after any contract expires.
Contact information	No longer than required for us to comply with legal requirements or 6 years after any contract expires.
Business information	No longer than required for us to comply with legal requirements or 6 years after any contract expires.
Profile information including contract preferences and consumption data.	No longer than required for us to comply with legal requirements or 6 years after any contract expires.

## 8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your

personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

In order to provide you with energy supply or purchasing energy you generate we share your personal data in order for these companies to provide quotations and potentially carry out credit checks on your business. We will only provide data that is required for them to quote, and subsequently contract with you. Should you wish to exercise your rights under data protection law you should also contact your supplier directly.

We may sometimes contract with the following third parties to supply products or services.

Recipient	Activity Carried Out	Sector	Location
Energy supplier	Quoting for and providing supply or purchase of your requirements.	Energy	UK.
Energy service provider	Quoting for and providing services to your business.	Energy / Data analysis	UK / EEA

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details

of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will normally respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our.

#### 11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Stuart Lloyd-Evans):

Email address: [info@cieloenergy.co.uk](mailto:info@cieloenergy.co.uk).

Telephone number: 01926 298 116

Postal Address: 12 Hamilton Terrace, Leamington Spa, CV32 4LY.

#### 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website. This Privacy Notice was last updated on April 30 2020.