

Privacy Policy

About our Privacy Notice

Owners Utility Limited and its affiliates ("Owners Utility Limited ", "OU", "us", or "we") respect your right to privacy. At OU, we look after any information which could identify you ("personal information") carefully and strictly in compliance with all UK data protection laws.

This Privacy Notice applies to our customers, users of our products and services, to our prospective customers who have shown an interest in our products and services and to anyone that interacts with us, such as by browsing our website ("you").

This Privacy Notice tells you who we are, how we collect, share and use your personal information, and how you can exercise your privacy rights. It applies to personal information that we use to provide you with our products and services (including when you show an interest in these) and personal information which we collect through our website or other communications with you. If we change the way we handle your personal information, we'll update this Privacy Notice and you'll be able to see the changes.

Please take a moment to read this Privacy Notice so that you understand how we use your personal information. Use the links on the left to navigate to a particular section.

If you have any questions or concerns about our use of your personal information, then please contact us at **privacy@ownersutility.com**.

Who we are and what we do

We're OU, a multi-utility supplier based in the United Kingdom. We supply people and businesses with utility, household and financial products and services, including gas, electricity, broadband, fixed line telephony, mobile and insurance.

To provide our services we are affiliated with a group of companies, including:

- Electricity Plus Supply Limited;
- Gas Plus Supply Limited;
- Telecom Plus PLC;
- Telecommunications Management Limited;
- Utilities Plus Limited;
- Utility Warehouse Limited;
- Utility Debt Collectors Limited; and
- 1p Mobile Limited.

We may notify you if this list of companies changes.

This Privacy Notice also applies to our Partners who recommend our services and provide support to the customers within their network. Partners handle your personal information in a way which is compatible with this Privacy Notice. Learn more about Partners here.

The type of personal information we collect

We collect your personal information when you contact us, when you use our websites, when you sign up to one of our services or take out one of our products, and as part of our ongoing provision of products or services. When collecting your personal information, we'll always make clear to you which information is necessary in connection with a particular product or service.

We collect different types of personal information depending on our relationship with you and the products or services we provide to you.

Broadly, these types of personal information include:

Information about you

Your name, gender, date of birth, email address, telephone number, mobile number, spoken language(s), billing/delivery/supply address, orders and receipts, home ownership status, a record of the products and services that we provide to you, and other information that may be required to check your identity.

Financial information

Method of payment

Bank account(s); debit/credit card(s); and direct debit details

Payment performance

Your financial circumstances, any unpaid bills / debt; any payment plans in place

We are PCI (Payment Card Industry) compliant, meaning we follow the industry security standard.

Service and usage information

Energy (gas and electricity)

Energy usage information, such as amounts and times of energy consumption; Your meter point number; Information about the state and safety of your boiler during the meter installation;

Mobile

Call data records, such as who contacted you, who you contacted, when the contact took place, the duration and your location when you used your mobile device; Similar information is recorded for data consumption while using your mobile device; Type of device consuming data; to identify you when you call our Customer Service number;

Phone and broadband

Call data records, such as who you contacted, when the contact took place, and call duration; to identify you when you call our Customer Service number;

Insurance

Data required to rate the risk of the insurance product you choose, such as information

about your house and household (such as number of occupants), joint policy holders' possessions, and your claims history;

Cashback scheme

Information about the amount you spend and the retailers you use;

Faults

Information about your home network, meter or usage patterns in order to fix the fault.

Marketing and communications information

Preferences

Your marketing preferences and whether you want to hear from us or third parties we work with;

Surveys

When you choose to complete any surveys we send you, we will receive the information you volunteer about your use of or interest in our products or services.

Technical information

IP address, device type, unique device identification numbers, device names (if you have a OU router), browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We also track how your device has interacted with our website by using cookies – see Section "Cookies and other similar tracking technology" for more information.

Service Communications

Content of your communications with us, including emails, letters, webchats and phone calls.

Sensitive information

Some of the information you provide may include sensitive personal information. You may provide this voluntarily, or we may need to collect it from you. Where we need to collect this information, we will obtain your consent or let you know our legal grounds for doing so, at the point when we ask you to provide this information.

Sensitive personal information we collect may include:

- Health-related information;
- Information about your race or ethnicity;
- Vulnerability information, for example if you have a health condition or disability;
- Information related to criminal convictions, for example if you apply for our insurance products.

Data received from third parties

Sometimes we will collect personal information from third parties. We use this information to provide you with our products and services, and as otherwise necessary to run our business. This can include:

- Verifying your creditworthiness with a credit reference agency. If you are a new OU customer, or an existing customer taking additional product(s) or service(s), you may be subject to checks using an external credit reference agency ("CRA"). Such checks may form a "footprint" on your credit file that may be visible to other organisations. The CRA will provide us with your credit information, such as your credit score and any judgments against you, which will allow us to assess your ability to pay our bill(s) and to ensure we set up the most appropriate payment terms for you;
- Validating and verifying your bank account details;
- Checking the land registry to find out who is responsible for the energy bill at a property;
- When you've given a third-party permission to share with us the information they hold about you. For example, your previous telephone, broadband, mobile or energy supplier;
- Information our suppliers or partnered companies provide us about the product or service you have purchased;
- The Partner who signed you up as a customer or the Partner who looks after your account with us;
- A third party who you have authorised to manage your account with us on your behalf (an "Authorised Third Party");
- Information from preference service providers, such as the TPS, CTPS and FPS;
- When you move into a property supplied by us, the landlord or previous occupiers may provide us with your name;
- Relevant information about you from third party data and insight providers to help us operate our business, manage debt and provide you with our products and services.

Why does OU process this personal information?

Most commonly, we process your personal information for one of the following reasons:

To fulfil the contract between us

We need to process your personal information to perform our contract with you. For example, to provide you with the products or services you purchased, manage your account, accurately bill you for services, and take payment from you. Without your personal information, we would be unable to provide you with the products or services you order from us.

For legitimate business interests

Sometimes, we need to process your personal information for a legitimate business interest. For example, to run our business, manage debt, promote our products and services, make improvements to how our business is run and to provide the best possible service to you.

To comply with our legal and regulatory obligations

As a multiservice provider, we must comply with the relevant legal and regulatory bodies, including the Financial Conduct Authority (FCA), the Office of Communications ("Ofcom"), and the Office of Gas and Electricity Markets ("Ofgem").

You have provided your consent

In specific situations, we'll ask for your consent before we collect and process your information. For example, if you have informed us that you're in a vulnerable situation, we'll ask for your explicit consent before we add your details to our Priority Services Register. When we ask for consent to process your information, we'll let you know why we need your information, what we will do with it and how you can withdraw consent.

More about our processing

To learn more about the OU Privacy Notice and how we may use your personal information, click here.

Who we share your personal information with

We may disclose your personal information to the following categories of recipients:

- Our group companies (includes any company listed at the top of this page) to make sure our customers are receiving a consistent service from us and our business operates efficiently;
- Third-party providers who help us provide our services to you or who process your personal information for the reasons above and based on our instructions. We have measures in place to make sure they keep your personal information protected.
- Other suppliers or partners. For example, should you choose to move your services to a new
 energy supplier, information such as your meter readings or equipment or money you may
 owe us will be provided to that new supplier so that they can begin to supply your gas and
 electricity; or should you choose to take out products or services (such as a new boiler) with
 a company that we partner with, we may need to pass on your information to that supplier;
- Unless you have specifically asked us not to do so, we will register your home phone number(s) with the Telephone Preference Service ("TPS") to protect you from unwanted sales calls;
- Unless you tell us otherwise, and depending on the products or services you have taken out
 with us, we may disclose your name, address and phone number to third parties in order for
 them to operate a directory service;
- The Partner who signed you up as a customer or the Partner who looks after your account with us;
- Referring customers are provided with the name and the homeowner status of the customer they successfully referred to us because this determines the amount of referral credit they get;
- Law enforcement bodies, regulators, government agencies, and courts where we believe
 disclosure is necessary for the performance of a task carried out in the public interest;
 disclosure is necessary as a matter of law or regulation, to exercise, establish or defend our
 legal rights, for the prevention or detection of criminal activities; to engage debt collection
 agencies; or to protect your vital interests or those of any other person;
- Health or social care bodies such as social services, healthcare and other support
 organisations, where we believe that you or a member of your household needs any extra
 care (perhaps because of age, health or disability), to help you by making sure that there is
 an energy supply to your home or to other energy suppliers in line with the Energy Retail
 Association 'Safety Net Procedures';

- Potential buyers (and their agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- To any other person with your consent;
- Credit reference agencies ("CRAs"). As an existing customer, certain personal information relating to your payment performance may be shared on a routine basis with CRAs. If another individual is associated with your account, the details of that individual may also be shared with the CRAs. If we consider that your account is in default (i.e. you have not paid our bill(s)) we may report the unpaid debt to CRAs who will record that default on your credit file and may share this information with other organisations.

The three main CRAs have produced notices on how personal information is processed by them as part of this service:

- https://www.transunion.co.uk/crain
- https://www.equifax.co.uk/crain
- https://www.experian.co.uk/crain
- The Department for Business, Energy and Industrial Strategy ("BEIS"). Certain personal information relating to your receipt of the HM Government's Energy Bills Support Scheme ("EBSS") payments and the Government's Energy Price Guarantee ("EPG") will be shared with BEIS to support administration of EBSS and the EPG. This may include your meter point number, meter readings, whether you have received and redeemed your EBSS payment(s) and details about your payment status or how you pay our bills. Sharing this information is necessary for the performance of a task carried out in the public interest and in the exercise of official authority vested in the Secretary of State for BEIS, for monitoring, assurance, fraud prevention and evaluation purposes of EBSS and the EPG. More information on how BEIS will use your personal information can be found in the BEIS Privacy Notice.

Transferring your information outside the EU

Sometimes we may transfer your personal information to organisations operating outside the UK and/or the European Economic Area, including in countries which do not have the same data protection standards as the UK. We have taken appropriate measures to ensure that your personal information will still be protected in accordance with this Privacy Notice. Further details can be provided upon request.

How we keep your information secure

We use technical and organisational measures to protect your personal information. These measures provide a level of security appropriate to the risk of processing your personal information. In line with our security procedures, we check your identity when you get in touch with us and apply suitable technical measures to protect your information, such as:

- Encryption;
- Implementing secure design principles within our information technology infrastructure;
- Adopting security safeguards against attacks;
- Adhering to security policies and training staff to enforce controls and procedures in line with data protection law and other industry-specific compliance requirements.

How long we keep your personal information for

We keep your personal information for as long as necessary for the reason we collected it. In most cases, this means we will keep your personal information while you are one of our customers, and for seven years afterwards. Sometimes we may retain it for longer if we are required to by law.

At the end of this period, your data will be deleted, destroyed or anonymised. We may aggregate anonymised data for statistical analysis and business planning.

Cookies and other similar tracking technology

Cookies are pieces of information sent to and from web pages. They can be used to identify when you have visited a website, how you interacted with that website and other websites that you then go on to visit.

We use cookies and other similar tracking technology to improve our website and display adverts of products and services to you that are more likely to be of interest to you. For further information about the types of cookies we use, why, and how you can control cookies, please see our Cookies Policy.

Profiling and automated decision-making

Occasionally, our use of your personal information may result in profiling, including automated decision-making. This may affect you legally or otherwise.

Automated decisions are made by computer determination, such as software algorithms, without human review. For example, we may use automated decisions to analyse your creditworthiness and verify your identity when we process your application for certain products and services.

When we make an automated decision about you, you have the right to express your point of view, contest the decision, and request a human review of the decision. You can exercise this right by contacting us using the details at the top of this Privacy Notice.

Links from our website to other websites

Please be aware that our site may provide links to other websites. We are not responsible for the content, security, or data processing policy of these websites.

Your privacy rights

You have various privacy rights in relation to your personal information:

- Accessing your personal information
 You can request a copy of your personal information at any time;
- Correcting your personal information
 You can ask us to correct the personal information we hold on you if it is incorrect;

• Erasing your personal information

You can ask us to delete your personal information in certain circumstances;

• Objecting to or restricting processing of your personal information

You can object to our processing of your personal information in certain circumstances;

Transferring your personal information

You can ask us to transfer your personal information to you or a third party, including a new supplier should you choose to move your services away;

Withdrawing your consent to processing

You can withdraw your consent to our processing of your personal information, however this will not affect the lawfulness of any processing conducted prior to your withdrawal;

Opting-out of marketing communications

You can ask us to cease marketing communications at any time by contacting us using the details at the top of this Privacy Notice, by clicking the unsubscribe or opt-out link in our emails, or by texting STOP to the number given in our text messages;

Complaining to the ICO

You can complain about our collection and use of your personal information by contacting the ICO (www.ico.org.uk).

We respond to all requests from individuals wishing to exercise their data protection rights in accordance with data protection law. We will try to respond to your request within one month; however, if it is complex or you make several requests, we may extend our time to respond. If we do, we will inform you.

You are able to exercise your rights free of charge, however if you make unfounded, repetitive or excessive requests, we may charge a fee or refuse to carry out your requests.

Updates to our Privacy Notice

From time to time, we may update our Privacy Notice in response to legal, technical or business developments. We will take appropriate measures to inform you of any updates, in line with the significance of any changes.

You can see when this Privacy Notice was last updated by checking the last updated date, displayed at the top of this page.