# PRIVACY POLICY

THE PURPOSE OF THIS NOTICE IS O HELP YOU UNDERSTAND WHAT INFORMATION WE MAY COLLECT ABOUT YOU AND HOW WE MAY PROCESS THIS.

Black Sheep Utilities Limited are registered in England and Wales providing energy consultancy services to businesses throughout the UK. We are committed to protecting the data we use to operate our business and use this responsibly whilst complying with all applicable data protection laws.



### DATA

We may collect and process the following data about you:

- Basic contact information, such as your name, your business telephone number and email address, that is in the public domain, for example on a website or public register or purchased from a legitimate marketing data provider;
- Information that is provided by you whilst filling out forms on our website and via telephone conversations required for legitimate business purposes.
- If you contact us, we may keep a record of that correspondence be it a recording of a telephone conversation via the call centre or a copy of an email or letter;
- Details of transactions you carry out through the business regarding the fulfilment of your energy service provision; and
- Details of your visits to our web site (see below).

### WEBSITE USAGE

Our website uses cookies as part of its functionality. A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use our website and what pages they tend to visit.

We may use cookies to:

- Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- Identify whether you are signed in to our website. A cookie allows us to check whether you are signed in to the site.
- Test content on our website. For example, 50% of our users might see one piece of content, the other 50% a different piece of content.
- Store information about your preferences. The website can then present you with information you will find more relevant and interesting.
- To recognise when you return to our website. We may show your relevant content or provide functionality you used previously.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies.

However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

# **DATA STORAGE & RETENTION**

Data is stored securely on our servers and only used for the purpose of which it is collected. We will retain data for as long as necessary to service the business relationship. If communication relates to transfer of goods/services, and the Company has an obligation to hold the information on file, the data will be held for a period of 6 years after the close of the financial year that the last transaction relates to.

If, as a client, you decide to place your energy through one of the providers we recommend, we will transfer your details to the provider to process your order. Other than this, Black Sheep Utilities do not transfer any personal data to third parties.

If we discover that your personal information is no longer associated with a business, for example you have left the Company, we will remove this from our database.

## LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Under the General Data Protection Regulation there are six lawful bases to process people's personal data, legitimate business interest allows personal data to be legally collected and used in the interest of the organisation as long as it is fair and balanced and does not unduly impact the rights of individuals.

We have conducted a balancing test in regards to our interests in carrying out marketing activities to promote our services and we have carefully considered the impact the collection and use of personal data could potentially have on individuals' rights. Our databases contain business data, which is used to promote our energy consultancy services in the UK and such activities are unlikely to affect the fundamental rights and freedoms of individuals concerned. We have therefore concluded legitimate interest is the most appropriate lawful ground for the processing of your personal data.

We contact the decision makers at organisations that could benefit from our services and may process their name, email address and telephone number in order to make contact. We obtain this data from various sources, this could be information publicly available on the internet or purchased from a legitimate marketing data provider. We check our records on a regular basis to ensure we respect those business contacts who have opted out via the Corporate Telephone Preference Service (CTPS).

In addition to this we have a contractual interest in processing personal data relating any subsequent sales and account contacts at our suppliers and customers. Specifically, name, email and telephone number. The processing of this data enables us to properly tend to our third-party business relationships and fulfil our obligations.

## LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Black Sheep Utilities recognise the rights of individuals regarding their personal data under the General Data Protection Regulations (GDPR). You have the right to:

- Request to see the personal data we hold about you (Access);
- Request that we rectify any inaccuracies in the personal data that we hold on you (Rectification);
- In certain circumstances, you may have the right to have your personally identifiable data deleted (Erasure). In many cases we would recommend that you allow us to suppress you from future communications via the database, rather than activate data deletion;
- In certain situations, you have the right to ask for processing of your personal data to be restricted (Restrict Processing);
- Request the transfer of any personal data you have provided to a third party in an accessible format (Data Portability);

- Request that we do not process your personal data for direct marketing and that we will keep your contact details to ensure that no further contact is made (Optout/Object);
- Object to our processing of your personal data if we are relying on legitimate interest as the lawful ground for processing (Object).

For more information on the data we hold about you, complaints, or for a handbook detailing how to exercise your individual rights and how to exercise them, please contact our data controller by email data.controller@blacksheeputilities.co.uk during office hours.

Black Sheep Utilities recognises the value of privacy and the important responsibility of processing personal data. In regard to complaints, we ask that you contact our data controller in the first instance, this does not affect your statutory right to lodge a complaint with the Information Commissioner's Office who is the supervisory authority in the UK.