



**Nabuh
Energy**

**Nabuh Energy Limited
Privacy Policy**

Privacy Notice

Your privacy is our priority. This statement explains how we collect, use transfer, store and share your personal data. We encourage you to read this policy so you know how we use your personal data and who we share it with as well as understanding the rights you have in relation to this. We are committed to collecting and using your information fairly and in accordance with the requirements of the General Data Protection Regulation 2018.

Introduction

Nabuh Energy and Your Personal Data

This is our Privacy Notice. It explains your statutory rights and how we collect and use your personal data. It describes the processing activities that are carried out by Nabuh Energy in relation to our supply of energy to your property, the purposes for which these activities are performed and the legal bases that Nabuh Energy relies upon for these processing activities.

Your personal information (referred to as personal data) is information which, on its own or together with other information we may have access to, can be used to identify you and provide you with appropriate products and services.

We may update this Privacy Notice from time to time to ensure it is always up to date and accurate. Any changes we may make to our Privacy Notice will be posted on this page, and we will communicate any significant changes to you.

Our Data Protection Officer helps us meet our obligations and ensures that we protect your personal data. If you have any questions about how we use your personal data, you can contact Nabuh Energy's Data Protection Officer by writing to: Data Protection Officer, Nabuh Energy

Limited, Floor 9, The Balance, 2 Pinfold Street, Sheffield S1 2GU or by emailing dataprocessingofficer@nabuhenergy.co.uk.

You also have certain rights. Please see Section 8 ("Your rights in relation to your personal data") of this document for more information. If you have any other questions about this policy, please contact us using the details set out above and in Section 9 ("Getting in touch").

Who We Are

Nabuh Energy is a company registered in the United Kingdom (Registered Number 09812753) with a registered office at Floor 9, The Balance, 2 Pinfold Street, Sheffield S1 2GU and licensed as an energy supplier under the Gas Act of 1986 and the Electricity Act of 1989 and will be the Data Controller of the personal data you provide to us.

We are registered as a Data Controller with the Information Commissioner's Office (ICO). Our registration number is **ZA263351**.

1. What information do we collect and how do we do it?

We collect personal data about you when you or a third party give it to us in relation to the products and services we provide to you, in a number of ways, such as:

- When you complete our online sign-up process;
- When you communicate with us by phone, letter, email, social media or in person;
- When you receive our products and services;
- When you request to be included on our Priority Services Register to safeguard your wellbeing or that of any other member of your household;
- From third parties, such as price comparison websites, industry organisations, landlords or letting agents, credit reference or fraud prevention agencies; or
- From publicly available sources like the electoral register or from the Land Registry or social media to verify your information or to trace you if you have moved without paying your bill.

We will let you know if providing that personal data is optional as well as where we may need your consent to use your personal data for any specified purpose.

We may collect the following personal data in relation to you:

- Your full name;
- Age/date of birth;
- Billing address (if this is different from your supply address);
- Supply address (this may include your previous supply addresses if you have lived in your current address for less than 2 years);
- Telephone numbers (this may include home, mobile and work phone numbers depending on how you have told us you wish to be contacted);
- Email addresses (this may include home and work email addresses depending on how you have told us you wish to be contacted);
- Details of a secondary contact (e.g. name and phone number) if you have indicated that you wish to provide this;
- Energy usage (e.g. electricity and/or gas meter readings provided by you or our agents or taken remotely if you are supplied by means of a smart meter);
- Details in relation to benefit entitlements;
- Financial information (e.g. bank account details). If someone else has agreed to pay your bills, then we will record their details instead of yours on your account;
- Personal requirements (e.g. disabilities or critical illness in relation to anyone resident at your property);
- Permissions (e.g. we will record if you have consented to receive marketing communications);
- Your preferences (e.g. if you would prefer paperless billing);
- If you are a home-owner or tenant;
- For electricity customers, your Meter Point Administration Number (MPAN) to identify your electricity supply;
- For gas customers, your Meter Point Reference Number (MPRN), to identify your gas supply;
- Information in relation to your property's characteristics (e.g. its age and number of bedrooms) if you have requested energy efficiency advice from us or if you have indicated that you want to compare your energy usage with other properties similar to yours;

- If you visit our website, we store your IP address, the browser software you use and your behaviour on the website (for example, the pages that you click on). This information is collected through cookies. More information about how we use cookies can be found in our cookies policy; <https://www.nabuhenergy.co.uk/cookie-policy/>
- If we, or our agents, carry out a home visit, we may collect personal data about you or a member of your household from that visit, e.g. we may record information if we believe that you or a member of your household may benefit from inclusion on our Priority Services Register;
- If we suspect that someone has committed fraud or stolen energy, e.g. by tampering with a meter or diverting the energy supply, we will record that information;
- If you register an account for services with us, we will create and record customer ID numbers for you and record the date of your application;
- If you give us information on behalf of anyone else then, in doing so, you must ensure that you have explained how their personal data may be used by us and that they have given you permission to do so; and
- If you have given us any special category data (such as health related information) about anyone else, you must ensure that the person to whom the information relates (unless the information relates to a child on whose behalf you are legally entitled to act) has agreed that we can use that personal data as set out in this document. This may happen because you are acting as the representative on the customer's behalf or because someone who is resident at your property requires additional support that we are able to provide.

2. What do we use your personal data for and why?

We can only use your personal data where such use is permitted by the GDPR. This requires that, where we use your personal data, we must

satisfy at least one condition (legal basis) for processing this. The applicable legal bases are: i) consent, ii) to comply with our legal obligations, iii) to carry out our obligations under our contract with you, iv) to further our legitimate interests and v) for special category data, where it is in your vital interests for us to do so.

Where you have given us consent, we will rely on that consent to process your information for the purposes set out at the time that the request for consent was made. You have the right to withdraw that consent at any time, although this may then mean that we are unable to offer you certain products and/or services.

In this case, we may collect, use and store your personal data to:

- Provide you with marketing information (including by phone, SMS, email, your online account and your smart meter's In Home Display) about products and services (including third-party products) which we think you may benefit from and where you have agreed to receive information of this nature. You can withdraw this consent at any time;
- Ask you to participate in market research (such as surveys etc) to assist us in improving our services and products. You can withdraw this consent at any time;
- Collect details of your half-hourly energy usage if you are supplied by means of a smart meter. You can withdraw this consent at any time;
- Disclose your personal data to other people or organisations such as someone whom you have appointed to deal with your account on your behalf, a person or organisation who has agreed to pay your bills or provide you with any other relevant assistance (e.g. a charity providing you with debt assistance). You can withdraw this consent at any time; or
- Record details relating to your inclusion on our Priority Services Register, such as any critical illness or disability you or anyone resident at your property may be affected by as well as any temporary circumstances (e.g. bereavement or financial difficulties) which may make it more difficult than normal for you to interact with us. Where you provide such consent, we will use the personal data provided by you to help us deliver the priority services that you have requested and to manage your account to assist you by providing any additional help or support you may need. You can withdraw this consent at any time.

Where the legal basis of complying with our legal obligations applies, your personal data will be used where we are required to do something as a result of any law, regulatory requirement or court order.

In this case, we may collect, use and store your personal data to:

- Operate our business in an efficient and proper manner, including managing our financial position, resource planning, corporate governance and audit obligations;
- Detect and prevent fraud or theft of energy, including interaction with the Theft Risk Assessment Service (TRAS);
- Comply with the relevant Gas and Electricity Acts, the conditions of our supply licences and the industry codes under which we operate;
- Comply with any court order requiring us to disclose your personal data;
- Provide any information requested from us by the Regulator and using its formal powers to do so;
- Carry out demand forecasting and settlement activities to meet the obligations we have in relation to these under the relevant industry codes;
- Respond to law enforcement or Government agencies where we receive a legitimate request to provide such information;
- Assist you if you exercise your legal rights in accordance with the GDPR; or
- Verify your identity and carry out fraud prevention checks.

Where the legal basis of performing our contractual obligations applies, our use of your information will be governed by the terms of the contract between us and you. Where you do not provide this information, this may then mean that we are unable to offer you certain products and/or services.

In this case, we may collect, use and store your personal data to:

- Provide you with a quote (which may include assessing your credit worthiness to help us decide which products, services and payment methods are most suitable for you);
- Verify your identity and authenticate information provided by you for security purposes;

- Set up and manage your account (e.g. collecting and processing payments, recovering debts and improving our service to you);
- Provide you with service messages such as account notifications and communications such as changes to our prices and terms and conditions;
- Supply you with any products or services you have requested that we provide to you;
- Facilitate your switch to or from us on the basis of the agreed industry processes;
- Enable you to make use of your online account (if you have one);
- Measure your energy usage and calculate your bills;
- Assess health and safety, environmental and financial risks to you;
- Provide and improve customer support;
- Resolve complaints and queries; or
- Train our staff and monitor the quality of the service that we provide to you. This may involve recording our conversations with you or keeping copies of any correspondence between you and us.

Where the legal basis of furthering our legitimate interests applies, we may use your personal data for our normal business purposes where the benefits of our doing so are not in conflict with your fundamental rights or freedoms. You have the right to object to data processing under this legal basis.

In this case, we may collect, use and store your personal data to:

- Operate our business in an efficient and proper manner, including managing our financial position, resource planning, corporate governance and audit obligations;
- Assist in debt recovery which may include tracing you if you have moved without paying your bill;
- Carry out credit checks or otherwise assess your credit worthiness;
- Carry out monitoring, modelling, analysis, reporting and auditing to ensure that we comply with our legal and regulatory requirements and to assist us in improving the products and services that we provide to you;
- Test systems to improve the products and services that we provide to you;
- Monitor emails, calls and activity on your account;

- Optimise web analytics to analyse and better configure our website and any online services we may provide;
- Take part in any Government or industry initiatives; or
- Assist us in providing any additional help that we reasonably believe you or anyone resident at your property may require, even if you are not included on our Priority Services Register.

Where the legal basis of vital interests applies, we may need to share information in relation to your circumstances with third parties because we believe that your or someone else's life is in imminent danger. This will be assessed on a case by case basis and we will not share any information under this legal basis unless we genuinely believe that there is a serious risk.

In this case, we may collect, use and store your personal data to:

- Record information about your circumstances if you are in danger of disconnection and we believe you or anyone resident at your property may require additional help, even if you are not included on our Priority Services Register.

3. Sources we collect your personal data from

We will collect personal data from a number of sources. **These include:**

- Directly from you;
- From website and mobile applications;
- From our third-party agents;
- From credit reference and anti-fraud agencies;
- From third-party data and insight providers;
- From the Government, Citizens Advice, the Energy Ombudsman Service and the Regulator;
- From social media;
- From housing associations and developers;
- From your previous energy provider;
- From other people linked to your account;
- From other companies' apps and products; and
- From public registers (e.g. the electoral register and the Land Registry); and
- From private interests.

4. Who we share your personal data with

We may share your personal data with the following categories of third parties for the purposes set out in Section 2 of this document. We will never sell your personal data to a third party for their own marketing use.

- Companies in the same group as us for support and administration purposes;
- Any third party approved by you;
- Advertising partners (where you have consented to this);
- Delivery companies so that we can provide you with Prepayment Meter keys or cards or any other relevant items that you have requested that we provide you with;
- Credit reference and anti-fraud agencies, including the Theft Risk Assessment Service (TRAS);
- Debt collection agencies;
- Other energy suppliers and industry bodies on the basis of agreed industry processes;
- The Government or the Regulator;
- Citizens Advice;
- Ombudsman services;
- Network operators and distributors;
- Companies that help us run our business;
- Legal and professional advisors, including our auditors;
- Agents and service providers acting on our behalf to carry out modelling and analysis and the testing of our systems to help us improve our services and products. We will not provide personal data to these parties unless it is specifically required for the services they provide to us; and
- You, if you make a request to obtain a copy of your information.

5. Direct Marketing

You will only receive direct marketing where you have specifically consented to this. Where this is the case, such marketing will only be carried out by means of:

- Email, SMS and telephone marketing;
- Nabuh Energy websites and mobile applications; and
- Third-party websites and applications.

6. How is your personal data transferred outside of the EEA?

We, or a third party whom we share personal data with, may host, store and handle that personal data outside of 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:

- (a) Ensure that the country in which your personal data will be handled has been deemed “adequate” by the European Commission under Article 45 of the General Data Protection Regulation (GDPR);
- (b) Include standard data protection clauses approved by the European Commission for transferring personal data outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR); or
- (c) (in the case of transfers from the EEA to the USA), ensure that the recipient of the personal data has certified with the US-EU Privacy Shield Framework, as permitted by Article 46.2 of the GDPR.

As an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

7. How long do we keep the personal data for?

We will keep your personal data for as long as we need it to provide you with the products and services that you have requested from us.

We will keep your personal data for as long as is necessary to deal with any queries or resolve any disputes.

We will keep your personal data for as long as we might need to do so to meet our legal and regulatory obligations.

After you are no longer a customer of Nabuh Energy, we will keep your personal data for 6 years unless we need to keep it for a longer period in order to meet our legal and regulatory obligations. However, a judgement will be made in relation to this on a case by case basis. Any personal data that is no longer required by us on any reasonable grounds will be permanently deleted from our systems.

8. Your rights in relation to your personal data

You have the following rights with regard to how we deal with your personal data. However, in certain cases where you ask us to correct, delete or cease processing your personal data, we will not always be required to do so if we have a reasonable legal basis in accordance with Section 2 of this document. If we believe this is the case, we will tell you why. We may ask you to provide us with the information necessary to confirm your identity before responding.

- The right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources;
- The right to access the personal data we hold about you;
- The right to request the correction of inaccurate personal data we hold about you;
- The right to request the blocking or deletion of your personal data in some circumstances;
- The right to request that we port elements of your data either to you or another service provider;
- The right to object to us processing your personal data (where we do so only because you have consented, or because we are using automated means to make decisions that affect you); and
- The right to withdraw your consent at any time.

9. Getting in touch

Contact our Data Protection Officer if you're not satisfied with our response or believe our processing does not comply with the GDPR. Please contact us by writing to: Data Protection Officer, Nabuh Energy Limited, Floor 9, The Balance, 2 Pinfold Street, Sheffield S1 2GU or by emailing dataprocessingofficer@nabuhenergy.co.uk.

If you're still unhappy and you do not believe that we have resolved your complaint, you have the right to contact the Information Commissioner's Office (ICO) (www.ico.org.uk). This is the regulator for the handling of personal data in the UK. The ICO can be contacted through its website, by phone on 0303 123 1113 or by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.