

Some more  
admin  
stuff that's  
important...





## Privacy Policy



## ➔ Privacy Policy

### ➔ Introduction

Your privacy is extremely important to us. This document sets out the Privacy Policy of Project Plug Limited t/a Click Energy (“the Company”, “Click Energy”, “we”, “our” or “us”). Our Privacy Policy explains what personal information we have, how we use it and how you can check and update any of your personal information.

Our Privacy Policy is provided in line with our obligations under the General Data Protection Regulation (“GDPR”) effective from 25 May 2018. From this date the GDPR, together with applicable United Kingdom law, including the Data Protection Act 2018, will amend existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR will also introduce changes which give you greater control over your personal information, including a right to object to the processing of your personal information where that processing is carried out for our business purposes.

### ➔ 1 Company Information

Project Plug Limited T/A ClickEnergy is a limited company, registered in Northern Ireland - company number - NI626418. Registered address – Click Energy, 1st Floor, Timberquay, 100-114 Strand Road, Derry/Londonderry BT48 7NR VAT registration Number: 197 2110 09. ClickEnergy is regulated by the Utility Regulator for Northern Ireland.



## ➔ 2 **Contact Us**

If you would like to know how your personal data is being processed or if you require any further information you can contact our Data Protection Officer as follows:

Data Protection Officer  
Click Energy  
First Floor, Timber Quay  
100 – 114 Strand Road  
Derry / Londonderry  
BT48 7NR  
E-Mail: [dpo@clickenergyni.com](mailto:dpo@clickenergyni.com)

## ➔ 3 **Privacy Policy Review**

This policy will be regularly reviewed and updated to ensure we continue to meet our obligations in processing your personal data and protecting your privacy. To do this, we will reserve the right to update, modify and amend this policy at any time as required. We would recommend that you check back regularly to keep informed of any updates, however we will not make any significant changes to the policy without informing you.

## ➔ 4 **Protecting your Information**

ClickEnergy is committed to protecting your personal data and to implementing appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

## ➔ 5 **Why do we collect your personal information?**

We and our agents collect your personal



information for the following reasons:

- To meet our legal obligation to supply electricity to you;
- To deliver products and services relevant to you;
- To improve our products and services and to develop new ones;
- To notify you of special promotions, competitions, offers or to provide you with details of other products and services that may be of interest to you;
- To help run and grow our business; and
- To answer an enquiry that you make of us in relation to the supply of electricity, or other products and services, to you.

We obtain this personal data during the registration process, marketing or through our on-going management of your account. We cannot provide you with energy services or offer you a contract based on the products or services which best suit your requirements unless we have the necessary information to do so.

## ➔ 6 What information do we hold and when do we collect it?

We hold the following information about you:

- Data to identify you, including your name, address, telephone number(s) (fixed and mobile), e-mail address, age, details regarding your property (type and tenure, source of heating, number of bedrooms, number of occupants and your 'Meter Point Reference Number') and your bank account details where you have signed-up for direct debit



- payment(s); and
- Data about your electricity usage and how much you spend on electricity.

In certain circumstances and as part of our regulatory requirements we may collect special categories of personal data for inclusion in our Customer Care Register, including any disabilities or special needs information necessary to support the provision of services to the customer.

We collect information which:

- You give us;
- Information from your use of our products, services or our website and mobile top-up app; and
- Information provided to us by third parties including other electricity suppliers and credit reference agencies to help us decide about the payment methods or other arrangements we offer you. Credit reference agency data may include the electoral register as well as shared credit and fraud prevention information. The credit reference agency check will leave a footprint on your file which may be seen by other lenders.

The provision of your personal data is a legal requirement to allow us to supply electricity to you. Without your personal data it may be difficult or impossible for us to perform our legal obligations to you, which could affect your ability to receive electricity. By way of an example, if you refuse to provide us with your name, address and contact details we will not be able to supply you with electricity.



## ➔ 7 How we use your information and the legal basis

We will use your personal data to provide you with energy products and services and to allow us to better manage your customer account. We may use and share your data where:

- You have agreed or explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time);
- Use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us;
- Use is necessary because we must comply with a legal obligation;
- Use is necessary to protect your “vital interests” in exceptional circumstances; and
- Use for our legitimate interests (which you may object to) such as managing our business including providing service information, conducting marketing activities, training and quality assurance.

### **Account Management**

We will use and disclose the information we have about you and your account to communicate with you by letter, telephone, e-mail, text (“SMS”), multimedia message or instant messaging (web chat), to administer your account, to provide services and products to you and to comply with legal requirements and obligations to third parties.

This includes processing information for the purposes of setting up, monitoring and managing your account; obtaining credit references; implementing a change of supplier; obtaining,



maintaining and exchanging information on meter points; reporting to the Utility Regulator of Northern Ireland and government departments; billing; and call data management (as described below).

We may monitor and record any communications we have with you, including telephone conversations, instant messaging (web chat), email and other electronic communications, and use any recordings, or transcripts from them, for training purposes or to investigate any complaint you may make or as evidence in any dispute or anticipated dispute with us.

We may ask you for additional information which we may reasonably require for the purposes described above (for example, we may need to know if you own your property or if you are renting it from another person). If you do not provide us with this information we may not be able to administer your account and/or provide services or products to you.

It is within Click Energy's legitimate interest to use certain personal data to establish, maintain and review an account to allow Click Energy to better manage customer's accounts, enforce rights set out in the terms & conditions of supply, and to ensure customers are provided with the most appropriate products and services and that customer complaints are resolved appropriately.





## Marketing

We may send you information about our products and services and those of carefully selected third parties (whose products and services may be unrelated to ours) which we feel may be of interest to you. This information may be sent by non-electronic means, including by post, live telephone calls or where we visit your premises; and by electronic means, including by email, SMS (texts) or multimedia messaging, smart phone applications and pre-recorded telephone messages, only where we have your consent or where we are otherwise permitted by law to do so.

This is necessary for our legitimate interests or those of a third party. It is within Click Energy's legitimate interest to provide you with information on Click Energy products and services including information that we have tailored to your interests.

Where you have provided us with your email address, we may email you to ask for your consent to send you marketing information by electronic means. Where we have your consent to send you marketing by electronic means or where we are permitted by law to do so, and you cease being our customer, we may still send you marketing information unless you tell us that you no longer wish to receive this information.

If you would prefer not to receive any marketing information please write to us specifying your account number (if applicable), name, address, postcode and e-mail address (if applicable) in any



such request. If you tell us that you do not wish to receive marketing information from us, we will not send you any marketing information. However, we may still contact you for other purposes (for example, to administer your account).

It is within Click Energy's legitimate interest to use certain personal data to establish, maintain and review an account to allow Click Energy to better manage customer's accounts, enforce rights set out in the terms & conditions of supply, and to ensure customers are provided with the most appropriate products and services.

### **ClickBacks (ClickEnergy Customer Reward Scheme)**

If you sign up to our ClickBacks Customer Reward Scheme, we are required to process your personal data to verify you are a Click Energy customer. This processing is necessary for our legitimate interests or those of a third party. It is within Click Energy's legitimate interest to verify that those signing up for ClickBacks are entitled customers. When you sign up to ClickBacks, you are requested to consent to the processing of your personal data for the purposes of administering and managing your ClickBacks account, which you may withdraw at any time by leaving ClickBacks.

### **Improving our Products & Services**

To improve our products, services and customer interaction we carry out customer surveys and market research which involves the processing of personal data. It is within Click Energy's legitimate



interest to provide you with the best customer experience by ensuring that we continually improve our processes and product and service offerings.

### **Debt Management**

To appropriately manage any debt issues if they were to occur, Click Energy may be required to process personal information. This is necessary for the performance of a contract to which you are a party to or to take specific steps prior to entering into a contract, and it is within Click Energy's legitimate interest to use certain personal data to help manage a debt issue and enforce rights set out in the terms & conditions of supply.

### **Special Categories of Personal Data**

To support customers requiring additional account management support (e.g. customers who are dependent on electrical medical equipment or who have special needs), we may from time to time obtain data concerning a customer (or previous customer's) health. This is needed to protect the vital interests of the individual where the individual is physically or legally incapable of giving consent to such processing and enables Click Energy to comply with legal and regulatory obligations to which we are subject under our Electricity Supply Licence requirements.

### **Website Statistics & Reporting**

Click Energy gathers statistical and other analytical information of all visitors to our website including cookies and click trails. We use the data gathered to get a better understanding of where our



visitors come from and to help us better design and organise our website. You can find our Cookie Policy at [www.clickenergyni.com/Privacy.aspx](http://www.clickenergyni.com/Privacy.aspx). It is within Click Energy's legitimate interest to provide you with the best customer website experience by ensuring that we continually improve our processes and website.

### **Staff Recruitment**

If you submit a job application, we will use your personal data for recruitment-related purposes, which may include contacting you via email, telephone, SMS or post. This processing is necessary to comply with legal obligations to which we are subject under our employment law and is done so with the consent of the individual.

## **⇒ 8 Sharing Your Information**

There are several circumstances in which we may share your personal data within Click Energy and other parties. Below is a list of such potential recipients or categories of recipients with whom we may share information:

- To meet our Licence and Regulatory requirements we are required to share certain personal data such as with the Network Company – Northern Ireland Electricity Networks Limited (NIEN).
- To meet our requirements with the regulatory bodies, e.g. the Northern Ireland Utility Regulator.
- To support the process for transferring customers between Energy Service Providers we are required to share certain personal data with previous, current and future suppliers to establish



all relevant details to help transfer supply and establish the details of any outstanding debt.

- To carry out credit checks when entering into an agreement we may share personal data with financial institutions & credit reference agencies.
- To meet legal and regulatory requirements we may share personal data with fraud prevention agencies.
- For debt management purposes we may in certain cases be required to share personal data with debt collection agencies.
- We may disclose information when required by law or legal process for the administration of justice, to protect your vital interest, for investigations by law enforcement or regulatory bodies, to protect and defend Click Energy's property and legal rights or by order of a valid order from a court or law enforcement agency.
- To support complaint handling we may share information with the Consumer Council for Northern Ireland (CCNI).
- Organisations who act as service providers to Click Energy such as providers of electronic communications, postal services, records storage, data storage, document production and destruction, IT services and security, fraud detection, customer reward programmes, marketing and market research, and making and receiving financial payments.
- Where you have consented for us to do so we may share your information with our sponsorship partners for the purpose of them/us contacting you to provide you with offers.
- In order to verify you are an active Click Energy customer we share certain personal data with our



- reward scheme programme provider.
- Where necessary to support our customers with poor health or disability, we may provide information to organisations or third-party agents to assist the customer. For example, we may request a statement to be issued in braille for a customer who is blind or partially sighted, or we may instruct an agent to visit a property to obtain a meter reading on a customer's behalf as they cannot physically obtain one themselves. These actions are carried out with the prior consent of the customer.
  - We may pass personal data to our agents and service providers and group companies when relevant for these purposes, including the use of cloud providers. This may involve passing your personal data outside of the European Economic Area and any such recipients will be bound to comply with the European Commission standard contractual clauses for the transfers of data outside the EEA.

## 9 How long do we hold your data?

We will retain your personal data only for as long as is necessary for the purposes for which it was collected and to meet the legal and business requirements of managing your customer account and experience with us. In particular:

- We will retain personal data that is necessary for us to provide you with a product or service that you have requested or purchased for as long as it takes us to provide that product or service;
- We will retain your contact details for marketing



purposes for as long as we have your permission to send you marketing information or for as long as we are permitted to do so, subject to your right to object at any stage;

- We will retain records of any transactions you enter into with us or products or services you receive for up to seven years after the date of the transaction. This is so that we can respond to any complaints or disputes that arise in that period;
- We will retain any financial transaction information for seven years after the date of those transactions; and
- We will retain other personal data necessary for us to do so to comply with our regulatory and legal requirements.

## ⇒ 10 Your Rights

The General Data Protection Regulation (GDPR) provides you with several rights under the legislation as a data subject. We will respond to your requests within one month of the receipt of your request or inform you in circumstances where an extension may be required.

### Right of Access

You have the right to be provided with details of the processing of your personal data and to obtain a copy of the personal data we hold about you, subject to applicable exemptions under data protection legislation. To make an access request please send your request in writing to the details below:



Data Protection Officer  
Click Energy  
First Floor, Timber Quay  
100 – 114 Strand Road  
Derry / Londonderry  
BT48 7NR  
e-mail: [dpo@clickenergyni.com](mailto:dpo@clickenergyni.com)

To help us better deal with your request please provide us with the information necessary to identify you (name, address, account number) and to identify the personal data you require.

### **Right to Rectification**

If the personal data we hold on you is inaccurate or incomplete you have the right to rectify such personal data and we would encourage you to ensure the personal data we hold on you is kept as up to date and accurate as possible.

### **Right to be Forgotten**

In certain circumstances you have the right to request the deletion of your personal data where there is no compelling reason for us to continue processing it. This is not an absolute right but can include circumstances such as:

- Where your personal data is no longer necessary in relation to the purpose for which it was processed.
- When the processing in question is solely based on consent and consent is withdrawn.
- When you object to the processing on grounds relating to your particular situation and there is no overriding legitimate interest to continue the processing.





- The personal data must be erased to comply with a legal obligation.
- Your personal data has been processed unlawfully.

### **Right to Restrict Processing**

In certain circumstances you can request the restriction of the processing of your personal data where you contest the accuracy of the information; where you object to processing which is based on legitimate interests; where the processing is unlawful and you wish to restrict the processing rather than seek erasure; or where we no longer require to retain your personal data but you wish the personal data to be held while you establish, exercise or defend a legal claim.

### **Right to Data Portability**

In circumstances where the personal data you have provided to us in a structured, commonly used and machine-readable format is based on your consent or for the performance of the contract and where the processing is carried out by automated means, you have the right to request that such personal data be provided to you or transmitted directly to another organisation.

### **Right to Withdraw Consent**

Click Energy processes your personal data using a number of legal bases apart from consent including entering into a contract with you in order to provide energy services. If, however, we are processing your personal data on the legal basis of consent (such as for marketing purposes) you have the right to withdraw your consent at any time. If you withdraw



your consent, we will no longer be able to carry out processing based on your consent. However, by withdrawing your consent it does not invalidate any processing which was undertaken prior to the withdrawal of your consent.

### **Right to Object to Processing**

You have the right to object to processing based on legitimate interests; direct marketing (including profiling for the purpose of direct marketing). Where we have indicated that we are processing your personal data based on legitimate interest, you are entitled to object to such processing on grounds relating to your particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where the processing is necessary for the establishment, exercise or defence of legal claims. If you wish to object to receiving direct marketing, please use the provided opt-outs or contact us and we will stop processing your personal data for direct marketing purposes.

### **Automated Decision-Making & Profiling**

You have the right not to be subject to automated individual decision making, including profiling, which produce legal effects concerning you or similarly significantly affects you unless it is necessary for the entry into or performance of a contract, authorised by EU or member state law; or based on your explicit consent.



## Right to Lodge a Complaint with The Information Commissioner's Office (ICO)

You also have the right to complain to the Information Commissioner's Office (ICO) at:

Information Commissioner's Office  
Third Floor  
14 Cromac Place  
Belfast  
BT7 2JB  
Telephone: 028 9027 8757 or 0303 123 1114  
E-Mail: [ni@ico.org.uk](mailto:ni@ico.org.uk)

Before contacting the ICO, please give our Data Protection Officer the opportunity to put matters right for you.

### ➔ 11 Consumer Council Contact Details

The Consumer Council for Northern Ireland (CCNI)  
Floor 3, Seatem House  
28-32 Alfred Street  
Belfast  
BT2 8EN  
Phone: 0800 121 6022  
Email: [contact@consumercouncil.org.uk](mailto:contact@consumercouncil.org.uk)  
[www.consumercouncil.org.uk](http://www.consumercouncil.org.uk)

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