



Privacy Policy

Intra Energy Limited is committed to protecting the privacy and security of your personal information. We are registered with the Information Commissioner's Office (ICO) and are committed to maintaining transparent and responsible data-handling practices. We comply with the General Data Protection Regulations (GDPR), effective from May 2018.

Good information handling makes good business sense. By maintaining accurate, relevant and secure personal information, we aim to strengthen our reputation, increase the confidence of our customers and employees, and improve the efficiency of our business.

Our organisation acts as a **Data Controller**, as we collect, store and process information relating to living individuals. As a Data Controller, we are required to comply with applicable rules governing how personal information is collected, used and protected.

Lawful Basis for Processing

We must have a valid lawful basis for processing personal data and be able to demonstrate that the processing is necessary for the purposes for which it is undertaken. There are six recognised lawful bases for processing personal information.

We process personal information on the following lawful bases:

Contract

We may process personal information where it is necessary to fulfil our contractual obligations, including providing quotations, delivering services or fulfilling warranty obligations.

Legal Obligation

We may process personal information where necessary to comply with legal requirements, including requirements relating to health and safety.

Legitimate Interests

In certain circumstances, processing personal information is necessary for our legitimate business interests, such as carrying out customer survey reports and improving our services.

Consent

In some circumstances, including where we need to process special category data as described below, we will request your explicit consent. We may also ask you to positively opt in if you wish to receive information about alternative products or services that we market separately.

Collection of Information – Your Consent

We may collect personal information from you when you voluntarily provide it to us. Where you provide personal information, we will assume that you have read this Privacy Policy and consented to us using your information in the ways described in this Policy and at the point where the information is provided.

If, after providing your personal information, you decide that you no longer want us to use it for a particular purpose, please contact us in writing using the address provided in this Policy.

Collection of Your Information

We may collect and process the following information about you:

- Your name, address, date of birth and contact details, including your email address.
- Details relating to the tenancy of your property, property type, heating system, required measures under any applicable Scheme and your eligibility route.
- Documents required to support eligibility for a Scheme. These may include bank statements, photographic identification, tax returns, P45 or P60 documents, evidence of qualifying benefits and, where applicable, health information provided through a referral letter from a doctor or GP identifying you or someone living at your property as having a qualifying health condition associated with cold living conditions, such as a cardiovascular or respiratory condition.

The information above may be provided by you:

- When purchasing our products or services.
- By completing our forms.
- Through correspondence with our Sales or Customer Relations teams.
- During the recruitment process.
- When registering for alerts.

Information may also be provided on your behalf by third parties, including third-party lead generators or data profiling companies where you have given them consent to share your information with us for the purpose of establishing trends.

For job applicants, information may be provided by a third-party recruitment agency and, where appropriate, by your doctor or GP.

We may also collect information through interactions with social media and statistical information relating to your browsing activities and patterns for the administration of employment applications.

We may require you to provide personally identifiable information in order for you to use our services. You confirm that any information you provide is accurate and truthful.

We will only request and collect information that is necessary or reasonable for providing the services you have requested and for improving the services we provide. You will not be required to provide additional information that is not necessary for these purposes.

Reasons for Collecting Your Information

Your personal information may be used by us, our employees, contractors, consultants or agents to:

- Identify you during communications between you and us.
- Assess your eligibility for services and products, including determining whether you meet the requirements of available funded Schemes outlined by the Department of Energy and Security and Net Zero (DESNZ) or Ofgem.
- Communicate with you to arrange the provision of services and products.
- Administer and provide our services and products.

- Detect and prevent loss, fraud and other criminal activity.
- Carry out credit reference checks through associated third parties.
- Conduct market research and review, develop and improve the services and products we offer.
- Contact you, in accordance with your preferences, by post, telephone, SMS, email and other electronic means with information about products, services, promotions and offers that may be of interest to you.
- Maintain legal certificates and records relating to services we have provided, including warranty, maintenance and guarantee information.
- Maintain information that may be required for health and safety notices, product recalls or modifications.
- Maintain industry body documentation, records and records of advice provided.

If we buy or sell a business or assets, we may disclose personal information to prospective buyers or sellers of that business or those assets. If we or substantially all of our assets are acquired by a third party, personal information held by us may form part of the transferred assets.

We may also disclose or share your personal information where we are legally required to do so, where necessary to enforce an agreement with or concerning you, or where necessary to protect our rights, property or safety, or those of our customers, employees or other third parties.

If you contact us, or we contact you, we may request certain information to confirm your identity, check our records and deal with your account efficiently and accurately.

With Whom Do We Share Your Personal Information?

For the purposes of any applicable Scheme, your information, including evidence provided to establish eligibility, may be shared with Scheme operators for auditing and reporting purposes.

We may also share your information with relevant third parties, including:

- Our professional advisers.
- Credit reference agencies, which may check information against other databases, whether public or private.
- Insurers.
- Fraud prevention agencies.
- Third-party service providers acting on our behalf.
- Our agents.
- Law enforcement authorities, including the police.

In connection with the purposes described in this Policy, your personal information may be transferred to or processed by third-party service providers acting on our behalf.

Access to Information

The GDPR gives you the right to access personal information held about you. You have the right to request a copy of the personal information we hold about you and to request that inaccurate information is corrected.

An access request will not normally be subject to a fee. However, where requests are considered unreasonable, a fee may be charged, and you will be informed of this at the time.



You can request a copy of the information we hold about you by writing to us at the address provided in this Policy.

Breach Notification

We maintain processes designed to identify, report, manage and resolve personal data breaches effectively.

Data Protection Complaints

We aim to comply fully with our obligations under applicable data protection legislation.

If you have any questions or concerns about how we manage your personal information, including your rights to access the information we hold about you, please contact us in writing:

Data Protection

Intra Energy Limited

Fairgate House, 205 Kings Road
Birmingham
B11 2AA

Alternatively, you can email us at:

info@intraenergyltd.co.uk

If we hold inaccurate information about you, please write to us at the address above and provide any supporting evidence showing how the information should be corrected. We recommend that you keep copies of all correspondence.

If, after a reasonable period of time, recommended as 28 days, the information has not been corrected, you may make a complaint.

There are two courses of action available:

- Contact us using the postal address or email address provided above.
- If you remain dissatisfied, you may contact the Information Commissioner, the independent body responsible for overseeing data protection and the GDPR.

The Information Commissioner can be contacted on **0303 123 1113** or through the ICO website at **www.ico.org.uk**.

Security

We are committed to keeping your personal information secure. To prevent unauthorised access, use or disclosure, we have implemented appropriate physical, electronic and managerial procedures to safeguard the information we collect.

We have implemented appropriate security measures to protect personal information against accidental loss, unauthorised access, use, alteration or disclosure.

Access to personal information is restricted to authorised employees and carefully vetted agents, contractors and consultants who require access to provide specific data-processing services or to support our IT security and maintenance.



These individuals are only permitted to access and process personal information for the purposes identified in this Privacy Policy and in accordance with our instructions.

Where a third party processes personal information on our behalf, we will take appropriate steps to ensure that they provide suitable commitments to process that information in accordance with applicable data protection requirements.

Where a third-party processor is located outside the relevant data protection jurisdiction, we will take appropriate additional steps to ensure that your personal information is protected and handled securely.

Where fraud prevention agencies transfer personal data outside the EU, they impose contractual obligations on recipients to protect personal information to the standards required within the European Economic Area. This may also involve the recipient subscribing to appropriate international frameworks designed to facilitate secure data sharing.

How Long We Hold Your Information

The length of time for which we retain personal information depends on the purpose for which it was collected and used.

Unless there is a specific legal requirement to retain information for a particular period, we will retain your information for as long as it remains relevant and necessary for the purpose for which it was collected.

All personal data, including evidence provided to establish eligibility, will be stored by us for a minimum of **six years** or until the relevant insurance-backed guarantee expires, whichever period is longer.

If your application is unsuccessful, we may retain your information for as long as necessary to enable us to contact you should we identify a new Scheme for which you may qualify.

We will retain account information for six years in accordance with relevant tax and contractual requirements.

For commercial customers, personal information relating to individuals may be retained for a different period depending on the relevant order and contracting cycles. For example, where a commercial customer commonly enters into five-year agreements, information may be retained for a short period beyond the point at which we would reasonably expect the agreement to be renewed.

For unsuccessful job applicants, we will generally retain CVs and supporting documentation for **three months** from the date of application.

If you would like us to retain your CV for longer and consider you for future roles, please let us know.

Fraud prevention agencies may retain personal information for different periods. Where an individual is considered to pose a fraud or money-laundering risk, information may be retained for up to six years.

Withdrawal of Consent

Where you have provided consent for us to hold or process your personal information for a particular purpose, you may withdraw that consent at any time.

You may withdraw your consent by contacting us using any appropriate method, including by email or in writing.



Right to Erasure

You are entitled to request that we erase your personal information, for example where you cease to be an active customer.

We will generally seek to comply with such requests. However, there may be circumstances where we are legally entitled or required to retain personal information, including where it is necessary to deal with legal claims or resolve outstanding matters relating to your account, such as monies owed.