



CUSTOMER PRIVACY POLICY
BE ENERGY
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Introduction

BE Energy take the privacy of their customer's very seriously and are committed to keeping your personal information secure. Please read the following privacy policy in order to better understand how we process data you provide to us throughout the duration of supply.

BE Energy only use your personal information to administer your account and to provide the products and services as requested, contractually.

This Privacy notice explains how our organization handles your information gathered throughout our operations and aims to highlight how we process your information, the purposes for doing so and how we store information and your rights as a data subject - amongst additional topics as deemed necessary for the purposes of this communication. We process all of your data with applicable UK/ROI legislation and as such our privacy terms and conditions may be subject to future changes, all changes will take effect once revised version(s) are published on our website.

We will post a notice of any material changes on our website prior to implementing the changes, and, where appropriate, notify you using any of the contact details we hold for you for this purpose.

We have a Privacy Centre available online for customer consultation, you can find the privacy centre and its contents at www.beenergy.ie/privacy-policy/. We encourage you to periodically review this notice [and supporting documentation] in order to remain informed with respect to how we use your information

Data Processing

Purposes for Processing Data

We collect customer personal information for different reasons, mainly for delivering contractual services. However, sometimes we might ask to contact you about marketing initiatives – this enables us to deliver the best customer experience possible.

We may require your personal information at times for reasons such as:

- Maintenance of your electricity connection agreement
- Managing the safe, secure and reliable operation of the electricity distribution system
- Facilitating the reliable operation of the retail and wholesale electricity markets
- Adhering to the licence and regulatory obligations governing the operations of the electricity market

Note: We ensure that the information we collect is appropriate for the purpose for which it was first acquired, only.

Data Processing Methods

Processing can undertake a variety of forms, examples of how we process your information for the purpose of our operations include instances such as

- Account management; this can include providing our terms and conditions, recording your meter readings, sending you invoices, administrating your payments and dealing with queries or complaints

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- If you move into another property where we supply the energy, we'll link your personal details for the energy at your new address.
- Your personal information may also be used to verify your identity, to protect against fraud, and to send you relevant updates e.g. notification of your bill.

We collect most of this information as result of delivering service/supply to our customers. However, we may occasionally receive information directly from our interaction with you, when you contact us in writing, by telephone or electronically (by email, using our website or on social media).

We may also obtain information about you from external parties, such as electricity suppliers as part of industry standard operations within electricity market.

Data-Types Processed

BE Energy collects and processes information that relates to data-types as specified below:

- Name
- Date of Birth
- Address
- Email Address
- Telephone Number
- Financial [Banking] Information
- Homeowner Status
- Medical Needs
- Special Service Requirement

In addition to the data-types outlined above there will be the occasional requirement for data collection related to instances such as:

- Information about you and your premises; this may include contact information and personal security information that you have provided to us to help us correctly identify you when you contact us
- Information about you, where you have electricity infrastructure on or near your land
- Information about current and past meter readings and electricity usage at your premises
- Details about current and past connection agreements and their holders at your premises
- Information about your interactions with us, including where you may have reported a fault or emergency
- Information about any special requirements you may have disclosed where continuity of electricity supply is critically important
- Recordings of telephone conversations with you
- Information about work carried out at your premises in the past, or planned to take place in the future

Protected Information

If you have any vulnerabilities, we'll ask for your consent before we add your details to our **Priority Services Register**, which enables us to take extra steps to ensure your safety

If you would like further information on the above, please feel free to contact us as highlighted within the 'Contact Us section of this document'

Special Category ("SC") Data

GDPR special category data relates to information that is especially sensitive and through exposure; individual rights and freedoms would be subject to adverse impact.

For example, racial or ethnic origin, political opinion and data concerning health.

BE Energy collect health related information, only in circumstances where it is necessary.

We use the information that we collect about customers (or a member of their household) for their welfare (e.g. due to age, health, disability or financial circumstances), to:

- a) ensure the welfare of householders e.g. ensuring we do not stop your supply and can respond appropriately during a major incident or emergency situation;
- b) ensure that our communications are adapted to provide equal treatment and opportunity to all customers
- c) ensure that we support and make provisions for vulnerable customers as necessary.
- d) ensure that we support and make provisions for vulnerable customers as necessary.

If you are a customer and you would like additional information on special category data, you can learn more by reviewing our 'Appropriate Policy Document' ("APD") within our Privacy Centre.

Secure Data Measures

Secure Data

We have implemented and maintain several security controls and measures by way of ensuring the best possible protection for our customers personal information, we fully recognise the importance of personal information entrusted in us:

- We ensure the physical security of our office locations through the procurement of secure facilities
- All our employees are trained on cyber security awareness and privacy best practices
- We ensure that all our protocols relating to the processing of personal information are clearly documented and are up-to-date.

- We regularly audit our systems and business processes to ensure we the best possible defences from both a legal compliance and security technical configuration standpoint

Data Storage & Retention

At BE Energy, we recognise the importance of Personal Data entrusted to us. We may collect and hold a range of information about you. Examples of the types of information we may hold include:

- Customer records related to communication and account interaction such as history and logs should future requirements arise for disclosing records, as such.
- We record our conversations with you, for example to prove you've agreed a contract with us, to help train our staff, or to help us give better service. We do not record cardholder data.
- Making appointments to read, inspect or change your meter to ensure we are billing you correctly and your meter installation is safe and appropriate for your needs
- Taking legal action against you if you do not pay our bills, because we're entitled to try and enforce our rights. This might be to recover money due to us, to disconnect your meter or fit a pre-payment meter
- Analysing your consumption so that we can offer you tariffs that suit your circumstances and give you tailored energy efficiency advice to help you save money
- For research and insight purposes, to enable us to provide good customer service

Information collected by us will be held for as long as it is required to fulfil the purpose it was collected and to protect our business and our rights. We are required to keep certain types of information for a specific period in order to comply with legal requirements. The length of time we keep any part of your personal information will depend on the type of information and the purpose for which it was obtained.

BE Energy will hold customer information throughout an ongoing supply contract. However, non-customer records are deleted after a period of two years.

So, if you were once a BE Energy customer but no longer are – we'll hold your data for no longer than two years. We do this to ensure we can meet regulatory obligations and for legal purposes.

If you have any questions around data retention periods, please feel free to contact our dedicated privacy team.

Customer Personal	
Audio Files	2 Years
Sign Up / Switch Information	2 Years
Customer Special Category (Vulnerable Customer Information)	2 Years

Data Sharing

We may share your personal data with, or disclose your personal data to, the following categories of third party:

- Network operators, so they can keep you informed about reconnecting your energy if there's a loss of supply or an emergency
- Agents appointed by us to facilitate our contract with you, such as Meter Operators and Data Collectors
- Organisations that supervise or distribute data between smart meters, energy suppliers and other organisations that enable suppliers to bill customers for energy used and customers to switch between suppliers
- Other energy suppliers, landlords or housing associations if we or another organisation suspects the property is connected to fraudulent activity
- Another supplier you want to switch to
- Other individuals where you have authorised us to, or where they are named on your account
- Debt collection agencies and other organisations involved with debt collection (for example, bailiffs, legal obligations, and private investigators)
- Market regulators such as the consumer protection organisation and the Energy Ombudsman
- Organisations for the detection, investigation and prevention of crime
- Commissioning and installation contractors for installations of Solar Panels
- For certain promotional offers, perks and bonus' alongside your contract. We will always contact you for your consent before we share any of your information with promotional partners.

EEA:UK Data Transfer

BE Energy fundamentally adhere to principles within GDPR, The Data Protection Act 2018 and Irish Data Protection Law.

BE Energy only transfer information from EEA (BE Energy) to UK (Budget Energy) by way of provisioning services and systems to both our customers and staff.

This data is ONLY transferred as necessary and used only in accordance with BE Energy's legal basis.

Throughout the current Brexit transition period, it remains business as usual for data protection across both jurisdictions (ROI & NI) – GDPR will continue to apply as normal and BE Energy continue to follow existing guidance for the compliance and protection of personal information.

BE Energy will continue to monitor updates to existing data protection positioning and we will update our external guidance to customers, accordingly.

Door-to-Door Sales

If you initiated your supply contract through a doorstep sales representative your information is still owned and governed by BE Energy.

We have legally binding agreements and secure systematic protocols in place to ensure the safe transfer and record of your data.

If you have any questions in relation to data sharing or data transferring, please do contact us.

Data Subject – Your Rights

GDPR (“General Data Protection Regulation”) affords strengthened privileges to data subjects and grants individuals specific rights they can exercise under certain conditions:

- i The right to portability
- ii The right to access information
- iii The right to rectification
- iv The right to be forgotten (erasure)
- v The right to restricting of processing
- vi The right to be informed
- vii The right to object
- viii The right not to be subject to a decision based solely on automated processing

Marketing Communications

From time to time we’d like to contact you with relevant existing and new customer promotional offers; you can opt-in by reaching out to our mailbox as provided, via telephone or by contacting us on social media.

Additionally, if you wish to opt-out you can do so anytime by emailing our dedicated privacy team (privacyie@beenergy.ie), via telephone or by contacting us on social media.

Privacy By Design

BE Energy have taken steps to adapt a privacy by design approach to projects ongoing throughout the business; working to promote privacy protection and data compliance at the kick-off stages of any of our internal projects involving data-types of relevant categories.

For example:

- When building new IT systems for storing or accessing personal data;
- Developing legislation, policy or strategies that have privacy implications;
- Embarking on a data sharing initiative; or
- Using data for new purposes.

BE Energy have implemented technical and organisational measures to minimise personal data processing and as a data controller only process data to an extent that is necessary (and in line with corresponding retention plans).

Privacy by Design means building privacy into the design, operation, and management of a given system, business process, or design specification; it is based on adherence with the 7 Foundational Principles of Privacy by Design:

- i. Proactive not reactive—preventative not remedial
- ii. Lead with privacy as the default setting
- iii. Embed privacy into design
- iv. Retain full functionality (positive-sum, not zero-sum)
- v. Ensure end-to-end security
- vi. Maintain visibility and transparency
- vii. Respect user privacy

Industry Codes of Practice

BE Energy processes your data in accordance to high standards overseen by industry codes of practice and UK legislation.

Regulatory Governance

Directions and codes of practise issued by both the Utility Regulator and OFEGM.

Relevant Legislation

- Consumer Protection Laws
- Orders made by a Court of law
- General Data Protection Regulation (“GDPR”)
- The Regulation of Investigatory Powers Act 2000 (“RIPA”)
- Data Protection Act 2018 (“DPA”)
- The Communications Act 2003
- Privacy and Electronic Communications Directive 2002/58/EC

Complaints Process

If for any reason you have a complaint about our use of your personal information, or you are unhappy in any way with the information we provide to you, we would like you to contact us directly so that we can address your complaint. You can contact our dedicated privacy team by:

Emailing: privacyie@beenergy.ie

Address: Customer Service, BE Energy Ltd, Energy House, 30-32 Ballinska Road, Springtown Industrial Estate, L’Derry, BT48 0LY.

Telephone: 0800 012 11 77

Relevant Contact Information

Please feel free to contact our dedicated privacy team by emailing privacyie@beenergy.ie for any privacy related concerns or queries.

You can review our privacy centre by visiting www.beenergy.ie/privacy-centre/

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