



Privacy policy

Last Updated 29/08/24

Privacy policy

Share Energy understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This Privacy Policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

1. Information About us

Company Information

Share Energy Trading Ltd is a company registered in Northern Ireland with the company registration number NI690170 and having our place of business at 37 Dargan Road, Fortwilliam Business Park, Belfast, United Kingdom, BT3 9LZ. Share Energy Trading Ltd is the data controller and is responsible for your personal data (referred to as “Share Energy”, “we”, “us” or “our” in this Privacy Policy).

Contact details

If you have questions as to the manner in which your personal data is being handled or if you require any further information you can contact our Data Protection Officer (“DPO”) using the details below:

Data Protection Officer

Share Energy,
Fortwilliam Business Park,
37 Dargan Road,
Belfast,
BT3 9LZ.

Email: dpo@share-energy.com

Tel: 0808 304 9870

By Post: Share Energy, 37 Dargan Road, Fortwilliam Business Park, Belfast, BT3.



You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. What is personal data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3. The data we collect about you

In order to provide energy products and services and provide you with information on these products and services we need to collect a number of categories of personal data through a number of channels including from you, third parties, other energy suppliers, the network provider and credit reference agencies. 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.

These personal data categories include: name, address, contact details such as telephone number, mobile phone number, email address, date of birth, property details, bank details, credit and debit information, records of payments and any arrears, marketing preferences, property categorisation, telephone recordings, CCTV recordings from our offices, website usage (on www.share-energy.com), IP address, energy usage, identity verification questions (such as mother's maiden name), and contact notes.

In certain circumstances and as part of our regulatory requirements, we may collect special categories of personal data for the customer care register, including any disabilities or special needs information necessary to support the provision of service.

4. How we use your personal data

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 have assessed that the legal bases for using your personal data as set out in this Privacy Policy are as follows:

- Consent: you have agreed or explicitly consented to the using of your data in a specific way (N.B. you may withdraw your consent at any time); or
- Contract: such processing is necessary for the performance of a contract to which you are party to or in order to take specific steps prior to you entering into a contract; or
- Legal Obligations: such processing is necessary to comply with our legal obligations; or
- Legitimate Interests: such processing is necessary for our legitimate interests or those of a third party. It is within Share Energy's legitimate interest to use certain personal data to establish, maintain and review an account to allow Share Energy to better manage customers' accounts, enforce rights set out in the terms & conditions of supply, and to ensure customers are provided with the most appropriate products and services, to run, grow and develop our business, to detect and prevent fraud, to enhance the security of our network and information systems; or
- Substantial public interest: such processing is required to protect the vital interests of the individual where the individual is physically or legally incapable of giving consent to such processing.

We have set out below a description of all the ways we plan to use your personal data:



Account Management

To set up and administer your account and manage your customer journey and contact with us, we are required to process your personal data. This involves processing personal data for the purpose of account set up, monitoring, identity verification and managing your account including obtaining credit references (commercial customers only), implementing a change of supplier and obtaining, maintaining and exchanging information on meter points, occupancy details, billing purposes and processing payments.

Customer Support

To respond to queries and manage and investigate any complaints we are required to process your personal data any may contact you by phone, mail or email in relation to your account. If you contact our Customer Service Team or if we contact you we will use personal data such as account information and contact history. We may monitor and record such communications, instant messaging (web chat), social media, email and other electronic communication to help investigate any complaints and for training purposes.

We may also, if permission is given, contact you via SMS for customer support purposes (including, but not limited to, appointment reminders, debt notifications and bill notifications). You can stop this at any time by contacting our customer service team or replying STOP to an SMS.

Marketing

In accordance with your marketing preferences, from time to time we may provide you with information on 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. Depending on your marketing preferences we may also contact you after you have ended your account with us to make you aware of our products, services and any available offers including those of carefully selected third parties. In order to provide you with relevant products, services, offers, promotions and to continually improve our customer services we may use personal data to analyse customer behaviour and customer data relating to you. Depending on your marketing preferences and as otherwise permitted by law we may contact you by:

- a) non-electronic means, including by post or in person; and
- b) electronic means, including live telephone calls, email, SMS (texts) or multimedia messaging, through your smart phone applications, web chat and chat services, pre-recorded telephone messages, social media (e.g. Facebook and Google), or through your smart meter.

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Credit Reference Checks & Fraud Prevention (Commercial Customers Only)

To enter into an agreement with you and assess any level of risk we may carry out necessary credit reference checks.

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. The processing is necessary for our legitimate interests or those of a third party. It is within Share 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, Share Energy may be required to process personal information.

Regulatory & Licence

In order to meet our Regulatory and Licence requirements Share Energy may be required to process personal data and provide information to the Regulatory Authorities and government departments.

Website Statistics

Like most websites, we gather 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 and for the purposes set out below at Customer Preferences and Account History. You can find our Cookie Policy at www.share-energy.com the best customer website experience by ensuring that we continually improve our processes and website.

Customer Preferences and Account History

To manage and administer any products or services we provide, to develop and manage our brands, products

and services and to develop and offer new products and services, we may review customer preferences and account information.

Recruitment

If you submit a job application online, we will use your personal data for recruitment-related purposes, which may include contacting you via email, telephone, SMS or post (subject to your consent).

Special Categories of Personal Data

In order to support customers requiring additional account management support (e.g. customers with poor eyesight or blindness requiring bills to be provided in braille or assisting customers in ill health with debt or payment management plans), we may from time to time obtain data concerning a customer (or previous customer's) health (with your explicit consent). We will use this data to maintain and update a Customer Care Register.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

There are a number of circumstances in which we may share your personal data within Share 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 Ltd (NIEN).
- To meet our requirements with regulatory bodies e.g. the Northern Ireland Authority for Utility Regulation.
- 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 Share Energy's property and legal rights or by order of a valid order from a court or law enforcement agency.
- In order to support complaint handling we may share information with the Consumer Council for Northern Ireland (CCNI).
- 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.
- Organisations who act as service providers to Share Energy such as providers of telecommunications, 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 Share Energy customer we share certain personal data with our reward scheme programme provider.
- 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 UK and any such recipients will be bound to comply with the appropriate Standard Contractual Clauses or equivalent data protection safeguards for the transfers of data outside the UK.

6. Data security

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an

unauthorised way, altered, disclosed, destroyed or damaged. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

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.

8. Your legal rights

The General Data Protection Regulation provides you with a number of 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. In order to make an access request please send your request in writing to the details overleaf:

Data Protection Officer

Share Energy,
Fortwilliam Business Park,
37 Dargan Road,
Belfast,
BT3 9LZ.

Email: dpo@share-energy.com

Tel: 0808 304 9870

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 has to be erased in order to comply with a legal obligation; or
- 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

Share 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 and to 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 including 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 ICO

You have the right to lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

Tel: 0303 123 1113

