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# End Customer Privacy Notice

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**Department: IT**

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# Vital Energi

## Privacy Notice for End Customers

Last Updated: November 2023

### Introduction

Vital Energi Utilities Limited and its affiliates, subsidiaries and related entities (“Vital Energi”, “we”, “our”, “us”) is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you”, “your”). Also, to ensuring we meet our legal obligations when processing your personal data.

The purpose of this privacy notice is to explain what personal data we collect about you when providing heating, cooling, or another billing service to you as a Vital Energi customer. Vital Energi Utilities Limited are registered as a Controller in the UK with the Information Commissioner’s Office, registration numbers Z805921X.

We sometimes process personal data on behalf of other organisations, such as when we manage metering and billing on behalf of landlords and energy supply companies. Where this applies, we are acting as their Processor and this privacy notice does not apply. You should read their privacy notice to see how they handle your personal data. Where we manage metering and billing on behalf of another organisation, all information and personal data you give to us will be shared with them as the Controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal data and your rights regarding such processing. If you have any questions about any aspect of this privacy notice, you can contact us using the information provided below or by emailing us at [dataprotection@vitelenergi.co.uk](mailto:dataprotection@vitelenergi.co.uk).

### Personal data we collect

We collect and process your personal data when providing our services to you. The personal data we collect may include:

- Name;
- Gender;
- Billing address;
- Supply address;
- Telephone numbers;
- Energy usage details (from meter readings or smart meter data sent to us automatically);
- Bank account details (if you pay by direct debit);
- Date of Birth (if you want to setup a direct debit);
- Previous addresses you have lived at (if you want to setup a direct debit);
- Credit or debit card details (if you wish to make a payment by card);
- Whether you are a homeowner or renter;
- Your Meter Point Administration Number (MPAN) or other unique meter identifier; and
- Any other personal data you provide to us.

If we need to visit your home to fix a fault or to carry out maintenance, we may also collect personal data from you when arranging the visit or from you or other members of your household during the

visit. Occasionally this might include sensitive personal data you choose to share with us, if it is relevant to the visit. This may include details of disabilities or illnesses that you would like the visiting engineer to be aware of.

We collect personal data from you when you give it to us. We may also collect personal data from third parties, including housing associations, managing agents, or landlords and property developers, for which we provide heating, cooling or other services as an energy supply company.

## Purposes for which we use personal data and the legal bases

When providing services to you, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful Basis for Processing
<b>Provide heating, cooling or another billing service to you.</b> Including metering your heating or cooling energy usage, calculating your charges and sending you bills.	Necessary for the performance of the energy supply contract to which you are a party.
<b>Maintain and support heating or cooling assets at your property.</b> Visiting your residence to maintain our equipment in the property and fix any faults you have reported to us.	Necessary for the performance of the energy supply contract to which you are party.  When processing sensitive personal data, we do so with your explicit consent.
<b>Take payment for heating or cooling services.</b> By direct debit, credit card or debit card, for the energy services we have or will provide to you.	Necessary for the performance of the contract to which you are party.
<b>Respond to correspondence from you.</b> Including enquiries, compliments and complaints.	It is our legitimate interest to respond to your correspondence, including enquiries, compliments and complaints.
<b>Sharing payment arrears and account balance information.</b> With your landlord or managing agent if you fail to make payments to us for the heating or cooling services we have provided to you, or if we are collecting payment on their behalf.	It is our legitimate interest to be paid for the services we have provided, and the landlord's legitimate interest to be made aware of debts for which they have agreed to be liable.
<b>Contact you for feedback.</b> Including sending you customer satisfaction surveys.	We have a legitimate interest to collect your feedback, develop our products and services and improve our business.

Purpose	Lawful Basis for Processing
<b>Internal management, administrative and organisational purposes.</b> This includes maintaining internal records and carrying out other business administration tasks.	We have a legitimate interest to process your personal data in order to manage our business.
<b>Statistics and other data analysis.</b> This includes creating forecasts and business plans, improving our services and developing new services.	We have a legitimate interest to process your personal data to develop and improve our business through aggregated and anonymised reporting and analysis.
<b>Sharing data with entities within our group.</b> Including sharing customer records with our subsidiaries and affiliates.	We have a legitimate interest to share your personal data with our subsidiaries and affiliates for administration and management purposes.
<b>Sharing data with other third parties.</b> Including third parties who process personal data on our behalf.	We have a legitimate interest to share your data with third parties who provide us with services relevant to our provision of services to you.
<b>Meet our legal obligations.</b> Including any laws or regulations which apply to us.	Necessary to comply with legal obligations to which we are subject.
<b>Detect and prevent crime, fraud or loss.</b> Including stealing energy such as by tampering with a meter.	We have a legitimate interest to detect and prevent crime, fraud and loss.

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## Sharing your data

We will share payment arrears information with your landlord or managing agent if you fail to make payments to us on time for the services we have provided. If we are providing services on behalf of your landlord or managing agent, we will share account balance information with them even if you have not fallen into payment arrears.

We share your personal data with trusted third parties who provide us with services relevant to our provision of services to you. This includes our professional advisers, IT service providers, cloud software provider, engineering sub-contractors and other suppliers and sub-contractors. All such third parties are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We also share your personal data with other Vital Energi entities in our group for administration and management purposes. We may also share your personal data where we are required to do so by law.

In some circumstances, we or one of our suppliers may host, store or handle your personal data outside the UK. We will only permit this to happen if the country in which your personal data will be processed benefits from a UK adequacy decision, or where a UK International Data Transfer Agreement is in place, which contractually obliges the supplier to process and protect your personal data to the standard expected within the UK.

## How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning. This is in accordance with the Vital Energi Personal Data Retention Policy.

## Your Rights

You have the following rights in respect of your personal data:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their personal data
Right of access	Individuals have the right to receive a copy of their personal data, and other supplementary information
Right to rectification	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete
Right to erasure	Individuals have the right to request their personal information to be erased, in certain circumstances
Right to restrict processing	Individuals have the right to request the restriction or suppression of their personal data, in certain circumstances, in particular: <ul style="list-style-type: none"> <li>• if your data is not accurate;</li> <li>• if your data has been used unlawfully but you do not want us to delete it;</li> <li>• if your data is no longer needed, but you want us to keep it for use in legal claims; or</li> <li>• if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request</li> </ul>
Right to data portability	Individuals have the right to obtain and reuse their personal data, in a machine-readable format, for their own purposes across different services, in certain circumstances
Right to object	Individuals have the right to object to the processing of their personal data, in certain circumstances  Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way

Rights	Description
	Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent	Where we are using your personal data based on your consent, you can withdraw that consent at any time
Right to lodge a complaint with the relevant supervisory authority	You have the right to raise a complaint about how we handle your personal information with the ICO. Please see below for details on how to exercise this right

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please email us at [dataprotection@vitalenergi.co.uk](mailto:dataprotection@vitalenergi.co.uk).

## Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Group IT Manager  
Vital Energi  
Century House,  
Roman Road,  
Blackburn  
BB1 2LD  
United Kingdom

Alternatively, you can email us at [dataprotection@vitalenergi.co.uk](mailto:dataprotection@vitalenergi.co.uk).

## Raising a complaint with the UK data protection supervisory authority

If you believe you have exhausted all possible avenues of resolving your data protection concerns with us, you may lodge a complaint with the ICO.

The ICO Helpline can answer your data protection enquiries on 0303 123 1113.

You can also send your postal correspondence to:

Information Commissioner's Office  
Wycliffe House

Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Alternatively, you can contact them at <https://ico.org.uk/make-a-complaint/>.

### **Changes to this privacy notice**

We may update this notice from time to time as shown at the top of this notice. We will notify of the changes where required by applicable law to do so.