**VE-POL-0009** 



## PRIVACY POLICY

Vital Energi Holdings Limited together with its affiliates and subsidiaries ("Vital Energi", "we", "our") is committed to protecting your privacy and meeting our legal obligations when visiting or contacting us through our website.

This privacy notice explains what personal data Vital Energi collects from individuals who visit our website, contact us using our web forms, by email or through one of our social channels; or subscribe for our newsletter or other marketing communications ("you/your"). It also explains what information we collect automatically when you visit our website.

If you contact us in relation to heating services we are providing to your residence or in relation to a bill we have sent you, please refer to our Privacy Notice for End Users.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the 'Last Updated' date at the top of this page. Please review this privacy notice periodically to check for updates.

#### Personal data we collect

When you contact us using the web form on our website, a corporate email account (such as <a href="mailto:sales@vitalenergi.co.uk">sales@vitalenergi.co.uk</a>) or through one of our social channels (including Twitter and LinkedIn) we collect the information you provide to us. This typically includes your name, email address, telephone number and company / employer's name (where applicable) and any additional information you include in your message.

When you visit our website, we will collect limited personal data automatically through the use of cookies and web beacons on our website. For more details see the section on cookies immediately below.

#### Cookies & social media links

Vital Energi uses Cookies and web beacons on our website and web beacons in some emails we send. Cookies are small text files and web beacons are small graphic images. They are downloaded to your device when you visit a website or receive certain emails unless you have set your browser to stop them.

We use cookies to remember your preferences, display content that is more relevant to you, improve your overall experience on our site and track visitors to our website. We use web beacons to track the actions of individuals (such as email recipients) and measure the success of our marketing campaigns and response rates.

For more information on the cookies and web pixels used on our website please see our Cookie Notice. You can manage your cookie preferences through your web browser settings, as set out in our Cookie Notice. You can also contact us at Dataprotection@vitalenergi. co.uk if you have any questions about the use of cookies on our website. Our website includes links to our social media channels. When you use one of these buttons or links you are visiting a 3rd party website (such as Twitter or LinkedIn) and this privacy notice will no longer apply. We do not accept any responsibility or liability for 3rd party websites and you should check their privacy notices before you submit any personal data to them.

## How we use your personal data

We use the personal data you provide to us to respond to your enquiry and, if you have agreed to us doing so, we use it to subscribe you to our newsletter and contact you with research reports, insights and other Vital Energi news and information. You can unsubscribe from our newsletter and associated communications at any time by contacting us at <a href="mailto:Dataprotection@vitalenergi.co.uk">Dataprotection@vitalenergi.co.uk</a>.

#### Basis for using your personal data

We use your personal data to communicate with you because it is in our legitimate interests to reply to enquiries made by individuals through our website, by email or through our social channels. Also, to send you our newsletter, research supports, insights and other Vital Energi news and information where you have consented to us doing so.

You can object to, or withdraw your consent to Vital Energi for using your personal data in these ways. You can do so by unsubscribing using the link provided in our emails or by contacting us using the details given below.

We only use cookies and web beacons with your consent. Unless you decline them, you consent to our use of cookies and web beacons by visiting and using our website. You can manage your cookie preferences through your web browser settings, as set out in our <u>Cookie Notice</u>. You can also contact us at <u>Dataprotection@vitalenergi.co.uk</u> if you have any questions about the use of cookies on our website.



## **Sharing your data**

If you have contacted us in relation to heating services we are providing to your residence or in relation to bill we have sent you, please refer to our Privacy Notice for End Users. This sets out how we share your data in those circumstances.

We also share your personal data with suppliers to our business who process data on our behalf. This includes, for example, cloud service providers. In such cases, our suppliers are data processors and may only use the data in line with our instructions and not for any other purpose.

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, such as in response to a court order or with government or law enforcement agencies.

### How long we keep your data

We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent.

# **Your Rights**

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

- · We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing
- · You have the right of access to your personal data and can request copies of it and information about our processing of it.
- · If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- · Where we are using your personal data with your consent, you can withdraw your consent at any time.
- · Where we are using your personal data because it is in our legitimate interests to do so, or for direct marketing, you can object to us using it this way.
- · You can ask us to restrict the use of your personal data if:
  - · It is not accurate.
  - · It has been used unlawfully but you do not want us to delete it.
  - · We do not need it anymore, but you want us to keep it for use in legal claims; or
  - 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.
- In some circumstances you can compel us to erase your personal data. 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 contact us at DataProtection@vitalenergi.co.uk

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at:  $\underline{www.ico.org.uk}$ 

#### How to contact us

You can contact Vital Energi in relation to data protection and this privacy notice by writing to:

Head of IT Vital Energi Century House Roman Road Blackburn BB1 2LD

Alternatively, you can email us at <u>Dataprotection@vitalenergi.co.uk</u>

Gary Fielding
Chairman

Date: February 2022

lan Whitelock
Chief Executive Officer
Date: February 2022

The original signed copy of this document is retained by the SHEQ Department Date Reviewed: 17th February 2022.