

Using your personal information – our fair processing (privacy) notice

This notice is in addition to and does not replace npower's Feed in Tariff Statement of Terms ("Statement of Terms"), and relates to you as a Nominated Recipient.

We would encourage you to read this notice thoroughly so you know how we use your information, who we share it with as well as understanding your rights. We are committed to collecting and using your information fairly and in accordance with the requirements of data protection law.



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1. Introduction

Your personal information (referred to as personal data) is information which, on its own or in conjunction with other information we may have access to, can be used to identify you and to provide you with appropriate products and services. This notice sets out how we collect, store, share and use the personal information we already hold about you and any we may obtain from you or from a third party in the future.

Our Data Protection Officer (DPO) provides help and guidance to assist us in meeting our obligations and to ensure we protect the data we hold about you. If you have any questions about how we use your information our DPO can be contacted by writing to Data Protection Officer, npower, Legal Department, Trigonos, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB. We take your privacy seriously and take appropriate steps to protect the personal information we collect from you and to make sure that your personal information is kept secure and only used in line with this notice.

In addition you have certain rights. See the section on “Your rights” and how our Individual Rights team can help you. If you have any other questions about this notice feel free to contact us using the details set out in section 11.

2. Who is npower and how can you contact us

We are what is known as a controller of the personal information we collect and use about you. When we refer to we”, “us” “our” we mean npower and its group companies whose registered offices are at Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB and consist of the following companies:

npower group company

The current npower group includes the following companies.

E.ON UK plc and the companies owned by E.ON UK plc who provide energy and related products and services (“E.ON”) following the acquisition by E.ON's parent company, E.ON SE, of a majority shareholding in the parent company of the npower group, innogy SE

innogy SE

Npower Group plc (company number 8241182)

Npower Commercial Gas Limited (company number 3768856)

Npower Limited (company number 3653277)

Npower Gas Limited (company number 2999919)

Npower Northern Limited (company number 3432100)

Npower Northern Supply Limited (company number 2845740).

Npower Yorkshire Limited (company number 3937808)

Npower Yorkshire Supply Limited (company number 4212116)

PS Energy UK Limited (9850654)

The address and registered office of E.ON is Westwood Way, Westwood Business Park, Coventry, CV4 8LG.

The address of innogy SE is Opernplatz 1, 45128 Essen, Germany.

The address of the other companies in the npower group is Windmill Hill Business Park, Whitehill Way, Swindon SN5 6PB.

As our products and services may be provided to you by different companies within our group it may be that your personal information is passed to the relevant group company or companies. You can find out more about npower <https://www.npower.com/> or about E.ON at <https://www.eonenergy.com/about-us.html>.

3. What information we collect about you

We need to ask you to provide certain personal information relating to your status as “nominated recipient” of one of our customer’s ‘feed in tariff’ (“FIT”) account so that we may administer and provide you with any payments under the FIT scheme that is due to you. It may be obtained directly from you or from any correspondence that you send to us or from another third party organisation or person.

We’ll tell you if providing that information is optional including where we may require your consent to use your information for specified purposes.

<p>From you:</p> <p>We will collect information about you over the phone, through any forms that you may complete. For example, we collect the following to assist us in setting up your details and to verify who we are dealing with:</p>	Full name (including title).
	Home address.
	Phone number, mobile number and email address (which may include home and work phone numbers as well as home and work email addresses depending on how you wish to be contacted).
	Bank account details.
<p>From you about other people, including the generator of the FIT account whom you are named as “Nominated Recipient”:</p>	<p>If you provide information on behalf of anyone else then in doing so you are confirming that you have explained how their information may be used by us and they have given you permission to do so.</p> <p>If you have provided any special category data (such as health related information) about others you must ensure that the person who the information is about agrees (unless relating to a child for whom you are legally entitled to act) that we can use the information as set out in this notice. This may happen because you are acting as the representative on the customer’s behalf or</p>

	because someone who is living with you requires additional support that we are able to offer.
From third parties	Publically available sources like the electoral role or phone directories (for example 192.com) or from the Land Registry or Companies House or social media to verify your information or to trace you if you have moved house and you owe us money.
From our website:	We collect certain data automatically from your visit to our website (www.npower.com). This may include but is not limited to some or all of the following: how you connect to the internet (including IP addresses), how you engage with our site, browser data stored on your device (for example cookies – see our Cookie Policy online at www.npower.com).
Keeping your information up to date: You need to let us know if your details (like your name, email or phone number) change so that we can keep that information up to date.	
Communications: We will keep copies of other correspondence or communication you have with us whether written or sent by email or text or provided in the completion of “contact us” or feedback forms on our website or posted via social media (Twitter or Facebook, etc.) as well as recorded telephone calls (we will always let you know when we record your calls), online web chats or recorded as a result of a visit to your home. We will also record any comments you make to us in free text fields so that we have a record of what you have told us.	

4. How we use your personal information – the legal basis and the purposes

We can only use your personal information where that is permitted by data protection laws. Those laws require that where we use your personal information we must satisfy one condition (legal basis) for processing. The legal bases are consent, to comply with our legal obligations, to perform a contract and if it's in our legitimate interests and for special category data (health) we may rely on consent, vital interests and public task as applicable to the purposes we are processing that information for.

Set out below are the different legal bases as well as examples of the types of processing we carry out:

Legal Basis for Processing	Processing activity (purposes)
<p>Consent</p> <p>Where you have provided consent we will rely on that to process your information for the purposes set out at the time that the request for consent was made.</p> <p>You can change that consent at any time (either by withdrawing it</p>	<p>Cookies</p> <p>We use cookies on our website to collect information about the device you use to access our website or sometimes third parties collect that on our behalf.</p> <p>You are asked to do this before using our website. If you refuse consent or you later remove it you may affect our ability to provide the services you want.</p> <p>See our cookie policy on www.npower.com for more information.</p>
	<p>Market research</p> <p>We may ask you to participate in market research (such as surveys, participation in focus groups, etc.) to help improve</p>

<p>or giving your consent where you previously hadn't). The consequence of withdrawing your consent might be that we are no longer able to do certain things for you.</p> <p>See the section on “Your rights relating to the personal information we hold about you” then “Right to withdraw Consent”</p>	<p>the way we provide our services and products that we are able to make available to you – if you agree your feedback is given with your consent.</p> <p>You agree to the disclosure</p> <p>If you request us to disclose your personal data to other people or organisations such as to a relative to deal with your account on your behalf or to company dealing with a claim on your behalf or you otherwise agree to such disclosures (for example to a charity providing you with debt assistance)</p> <p>When we process any special categories of personal information at your request (e.g. your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation).</p> <p>Special Category Data</p> <p>When we process any data relating to any vulnerabilities you provide to us (such as health conditions, age or disability) to assist you with payments from the FIT account in which you are the ‘Nominated Recipient’ for.</p> <p>We may share your vulnerable information that you have provided to us (such as health, age, disability) with our agents and service providers (like metering companies) who carry out services on our behalf and to our group companies in the event you take supply of your gas and/or electricity from us in order to provide additional assistance with your gas and/or electricity account.</p>
<p>Vital Interests</p> <p>We may need to share information about your circumstances with third parties because we believe you or someone else’s life is in imminent danger.</p> <p>This will be assessed on an individual basis and we will not share information unless we really believe there is a serious risk.</p>	<p>If you are in danger of being cut off and we believe you may need extra help we may record information about your circumstances.</p> <p>You or a member of your household may need this extra help as a result of your (or their) health, age, disability or financial circumstances (we assess and record who may require extra help as a result of their circumstances) in the event that you take supply from us in order to provide additional assistance with your gas and/or electricity account to assist you or them and ensure you or they stay on supply.</p>
<p>Special Category Data and Public Task</p>	<p>Where we process special category data about you (e.g. health data), we may rely on the substantial public interest involved as an additional condition for processing that data.</p> <p>We may process your data in this way and share it with other organisations in situations where we know you require additional assistance and either we, industry</p>

	<p>organisations like transporters and distribution network operators (who may then share that information with water companies in line with agreed industry processes) or another supplier need to process your data so we/they can offer or continue to offer you appropriate services to meet your needs and to ensure you remain on supply.</p> <p>If we process your data under this condition we will act in a way that's proportionate.</p>
<p>Performance of our Contract with you to provide products and services or to take steps at your request prior to entering into that contract</p> <p>The information described above will be provided to us by you because you want to engage with us or take our products and services.</p> <p>Our use of your information will be governed by your contract terms. It is up to you if you provide it but if you do not it may affect the products and services you want.</p>	<p>To provide you with details of payments that are due to you under the npower FIT Scheme.</p> <p>To help us identify you so we know who we are talking to and authenticate the information you provide for security purposes.</p> <p>To set up, register and administer your status as 'Nominated Recipient' on the applicable FIT account, including processing payments due to you, collecting payments that may be due to us, recovering debts.</p> <p>To enable you to access our website to use our services.</p> <p>To measure the electricity generation and export and to work out any payments due to you under the Npower FIT Scheme.</p> <p>To provide and improve customer support.</p> <p>To resolve complaints and query resolution.</p> <p>To train our staff and monitor our services. This may involve us recording our conversations with you or keeping copies of our correspondence with you to make sure we are providing you with a good service and are keeping to our legal and regulatory obligations.</p>
<p>As necessary to fulfil a Legal Obligation</p> <p>This is where we are required to do something by law, regulatory requirement or by way of a court order.</p>	<p>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.</p> <p>To help prevent and detect debt, fraud, overpayment or incorrect FIT payments and/or any abuse of the Npower FIT scheme.</p> <p>To comply with legal and regulatory requirements including those set out in the relevant electricity Acts, the FIT Orders, our licence conditions and industry codes which govern how we operate.</p> <p>To provide certain information to Ofgem as regulator for the feed in tariff and the energy industry either as part of an investigation by them or as part of request for information or as part of an audit of our services or as part of a government data-sharing initiative and to other similar organisations such as BEIS for the purpose of gathering</p>

	<p>information on electricity generated and/or exported by Feed in Tariff installations..</p>
	<p>To provide certain information to Ofgem as regulator of the feed in tariff scheme for the purpose of compliance with our legal obligations which include but are not limited to reporting obligations, administration and auditing of the feed in tariff scheme that npower provides on behalf of Ofgem, and to update the Central Feed-in-tariff Register accordingly.</p>
	<p>To relevant law enforcement agencies or government agencies where we have been asked to provide the information for legal or regulatory reasons (if we receive a legitimate request for the information).</p>
	<p>To assist you if you exercise your legal rights under data protection law.</p>
	<p>For the establishment and defence of legal rights.</p>
	<p>To verify your identity, make credit fraud prevention and anti-money laundering checks.</p>
<p>As necessary for our own Legitimate Interests</p> <p>This is where we use your personal information for our normal business purposes where the benefits of doing so are not outweighed by your fundamental rights or freedoms.</p> <p>You have a right to object to this type of processing. See the section on “Your rights relating to the personal information we hold about you” then “Right to object”</p>	<p>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.</p>
	<p>To help prevent and detect crime such as fraud and money laundering where this is not covered by our legal requirements and we are processing your personal information to help reduce the cost of this activity being spread across all customers by way of increased prices.</p>
	<p>To send you service messages that are not strictly necessary for the performance of our contract but we believe will assist you and will improve our service to you.</p>
	<p>To assist in debt prevention and debt recovery which may include tracing where you have moved to where such processes go beyond what is strictly necessary for the performance of our contract with you.</p>
	<p>To resolve complaints and query resolution which go beyond strictly performing our contract with you.</p>
	<p>To carry out performance reviews, monitoring, modelling and analysis, reporting, profiling, auditing, market research (where the analysis is carried out by third parties who do not provide us with your details unless we have your specific consent to do so and may extend beyond the FIT scheme to include aspects of your lifestyle, etc.) and statistical analysis to assist us in ensuring we can comply with legal and regulatory requirements (including those set out in our licence conditions and industry codes) as well as to help improve the way we provide our services and the products that we are able to make available to you.</p>

	To monitor emails, calls, other communications, and activities on the FIT account in which you are the 'Nominated Recipient'.
	To carry out data enrichment and ensure the information we hold is accurate and up to date.
	Web analytics to analyse and better configure our website.
	To take part in government or industry initiatives (for example to tackle fuel poverty, improve energy efficiency or other social or consumer interests).

5. Who we share your information with

We may give your personal information to others in connection with the purposes set out above, including to the following:

- a** Agents and service providers (including IT service providers who host our databases) to support our business who may have access to our systems and data in order to provide services to us and/or to you on our behalf. For example we outsource some of our customer services activity (such as call handling, metering services, debt collection), and use fulfilment companies to send out our service and marketing communications to you.
- b** Our legal and professional advisors including our auditors.
- c** Our processors and sub-processors who are involved in the hosting, development and testing of our IT systems.
- d** Other members of the npower group of companies as we may benefit from large IT infrastructure and expertise that exists within our business. This means that your personal information may be accessed for support and administration purposes.
- e** Relevant industry organisations and agencies, based on agreed industry processes who are involved in the FIT scheme as well as industry organisations who operate and maintain databases on behalf of the industry to assist (for example) in the change of FIT provider process.
- f** With E.ON (as npower has become part of their group of companies) who may then share your information with their service providers and agents (who act on E.ON's behalf to support E.ON's business activities) should they need to service and/or maintain your account in the future. If you want to understand more about how E.ON handles personal data you can view their privacy policy at <https://www.eonenergy.com/privacy.html>
- g** If we suspect someone has committed fraud we'll record those details on your account and may share that information with Ofgem, and other interested parties such as other energy suppliers, landlords, housing associations, fraud prevention agencies and other organisations (such as the police) involved in crime and fraud prevention who may also use this information.
- h** The police, other relevant law enforcement agencies, regulators, public bodies such as local and central authorities (including government agencies/departments) where we have been asked to provide the information for legal or regulatory reasons (such as prosecuting offenders, assessing or collecting tax, investigating complaints or assessing how the energy sector is working) for example by a lawyer or Ofgem or to the Information Commissioner (if we receive a legitimate request for the information).
- i** For regulatory purposes to Ofgem (or any organisation which takes over Ofgem's role) or directly to an agent acting on their behalf, or as part of a government data-sharing initiative. They may pass that information to other agencies to be analysed or for other purposes relevant to their request or investigation.

- j** We may share information with Members of Parliament, journalists or Citizens Advice if you have asked them to assist you in dealing with a complaint.
- k** If an organisation takes over all (or nearly all) of our business or assets, we may pass your personal information to them and we may pass details of any debt you may have with us to your future service provider.
- l** To other parties connected with your account for example if you have provided a delegation of your authority to a partner, relative or a friend to allow them to assist you in dealing with your account.
- m** You if you make a request to obtain a copy of your information (see the section “Your rights relating to the personal information we hold about you”).

6. Security

We take the security of your personal information very seriously and operate to the standards required by law to protect it against unlawful or unauthorised processing. We train our staff to protect your personal information and check your details when you contact us. We maintain data security by protecting the confidentiality, integrity and availability of your personal information so only those people who are required to access it are able to do so and those staff receive training to ensure they know how to handle your personal information in an appropriate manner.

Whilst we put in place appropriate measures the internet and electronic means of communication are not secure and you use those to communicate with us or to receive services from us at your own risk. You must ensure you keep any account and login details and passwords secure and do not disclose them to anyone. Please ensure that you log out of any account and close your browser when you have finished.

7. Transfers outside the UK and safeguards

- (a) Although we are based in the UK we also may pass your personal information to service providers, agents and subcontractors based in countries outside the European Economic Area (EEA). For example we outsource some of our customer and IT services to organisations based in India, the USA and South Africa.

These countries may not have the same level of data protection as we operate in the UK. To make sure we keep your information secure we apply strict safeguards when transferring and processing your information outside of the EEA. We will only transfer your personal information:

- to countries approved by the European Commission as having appropriate data protection laws to ensure an adequate level of protection for your personal information such as Canada, New Zealand; or
- where we have put in place our own measures to ensure an adequate level security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas agents, service providers, etc. backed by strong contractual undertakings approved by the relevant regulators for example the EU style Model Clauses. Visit the ICO website www.ico.org.uk and search for “international transfers” for more information; or
- to a member organisation approved by the European Commission as having a suitable level of data protection for example the EU-US Privacy Shield which covers transfers to the US. Visit www.privacyshield.gov for more information.

- (b) If the UK exits the EEA without a withdraw agreement (a “No-Deal” Brexit), we will continue to transfer personal data to countries within the EEA and to those countries that the European Commission has deemed to provide adequate safeguards on the basis that they are also deemed to provide adequate safeguards by the British government. If we do not exit the EEA (Article 50 is revoked or delayed) or we exit with a withdrawal agreement then the position remains as set out in (a) above.

8. Retention Periods (whether or not you become a customer)

We use the following criteria to determine the appropriate data retention periods for your personal data:

- We'll keep your information for as long as we need it to administer payments to you under the FIT account in which you are the 'Nominated Recipient'. We'll keep your personal information for as long as is necessary to deal with any queries or to resolve any disputes.
- We'll keep your personal information for as long as we might legally bring a claim against you or defend a claim made by you.
- We'll keep your personal information for as long as we might need to do so to meet our legal and regulatory requirements (for example for tax purposes, compliance with our reporting requirements, to meet our licence condition obligations, as instructed by Ofgem, etc.).
- We'll keep your personal information after you are no longer a customer and your account has been closed based on our legal and regulatory requirements and as instructed by Ofgem.

After you are no longer a customer of ours we will retain your information for 6 years unless we require it for longer to meet our legal and regulatory requirements or as otherwise instructed by Ofgem for example, matters relating to declarations and grants received by yourself as a FIT generator. However, the reasons we need to keep your personal information can vary from one piece of information to the next and may vary in relation to the different products and services you have signed up to so the length of time we keep your information for may also vary. Any information that is no longer required for any purposes will be disposed of by an appropriate means.

9. Your rights relating to the personal information we hold about you

- a You have the following rights in relation to how we deal with your personal information. However, in some cases where you ask us to correct, delete or stop processing your personal information we won't always be required to do so. If we believe that is the case we will explain why.
- i **Right to withdraw Consent** – if you've given us consent to process your personal information you have the right to withdraw that consent at any time by utilising the available unsubscribe options to marketing emails or texts or contacting us on 0800 048 0520 (generally free from most landlines and mobiles) Monday – Friday 8am-6pm.
 - ii **Right to be Informed** – you are entitled to be told about the collection and use of your personal information. This is achieved by this notice which set outs what data we collect, how we use it and who it is shared with, etc. along with giving you appropriate “just in time” notices when we collect your information at different points in time through your dealings with us be that on the phone, by letter, via our online journeys, etc.
 - iii **Right to object to processing based on it being in our legitimate interests** – where we rely on this legal basis to process your data (i.e. that it is fair to use your personal information either in our interests or in someone else's interests where there is no disadvantage to you (as opposed to any other ground)) you have the right to object to us using your personal information for those purposes. We do not have to stop processing your personal information if we can show that it is in our overriding interests to carry on processing your personal information and it will not cause you unjustified harm. In making this assessment we will balance our interests against yours.

- iv Access to your personal information** – you are entitled to see the personal information that we hold about you at any time so you are aware of and can verify the lawfulness of how we are using it. If you write to, email or phone us and ask to see this information, it is known as a 'subject access request' or "SAR" for short. If it is not clear who we are dealing with or we are unsure precisely what you are asking for we may need to ask you to provide some additional information. We will not charge a fee unless your request is manifestly unfounded or excessive (particularly if it is repetitive) when we may charge you a reasonable fee for obtaining your information based on the administrative costs of providing it.
 - v Erasure (also known as the right to be forgotten)** – you have the right to have personal information deleted where it is no longer necessary for us to use it, you have withdrawn consent or we have no lawful basis to keep it.
 - vi Rectification** – you can ask us to change or complete any inaccurate or incomplete or incorrect personal information that we hold about you.
 - vii Data portability** – you can ask us to provide you or a third party with some of the information we hold about you in a structured, commonly used electronic form so it can be easily transferred.
 - viii Restriction** – you can ask us to restrict the personal information we use about you where you have asked it to be erased or you have objected to our use of it.
- b** You may exercise any of the rights set out above by:
- **Write:** npower – The FIT team, Oak House, Bridgwater Road, Worcester, WR4 9FP; or
 - **Call:** 0800 048 0520 (generally free from most landlines and mobiles) Monday – Friday 8am-6pm.

c Right to complain

If you are unhappy about the way we handle or use your personal information please write to us at Data Protection Officer, npower, Legal Department, Trigonos, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB and we will do our best to resolve your complaint. If you wish to make a complaint about any other matter please see the details on how to complain as set out in the Statement of Terms or see the section on how to do so on our website at www.npower.com.

If you're still unhappy and you do not believe we have resolved your complaint you have the right to contact the Information Commissioner's Office (ICO). They are the supervisory body that regulates how personal data is handled in the UK. If you go to them before you have contacted us they may ask you to get in touch with us first to see if we can help you and resolve your complaint before they will investigate it.

The ICO can be contacted by their website at www.ico.org.uk, by phone on 0303 123 1113 or by post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

10. Updates and Changes to this Privacy Notice

This notice was updated in October 2020 and it replaces any previous notices we may have provided to you. We regularly review it and we can update it at any time so it is a good idea to check it from time to time to see if anything has changed. If we make any significant changes to this notice or to how we use your personal data we will contact you to let you know about the change and where appropriate ask for your consent.