



npower

Health Through Warmth

Warmer homes, better health.

Using your personal information

This is the privacy policy for npower Health Through Warmth. We would encourage you to read this policy 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.

INDEX

Section	Page
1. Introduction	3
2. Who is npower and how can you contact us	3
3. What information we collect about you	4
4. How we use your personal information – the legal basis and the purposes	7
5. Who we share your information with	12
6. Security	14
7. Transfers outside the UK and safeguards	15
8. Retention Periods (whether or not you become a client)	16
9. Your rights relating to the personal information we hold about your Website	17
10. External links from our website	19
11. Website Search engine	19
12. Visitors to our websites	19
13. Cookies	20
14. Data Retention, Managing your information on our website	20
15. Updates and Changes to this Privacy Policy	20

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 services. This policy 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 policy.

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 policy feel free to contact us using the details set out in section 9.

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:

innogy SE

Npower Group Limited (company number 8241182)

Npower Commercial Gas Limited (company number 3768856)

Npower Direct Limited (company number 3782443)

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 (company number 9850654)

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 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 on our website at www.npower.com

3 What information we collect about you

We need to ask you to provide certain personal information depending on the services we provide to you. It may be obtained directly from you when we speak to you or via our website if you complete an online form/ application 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: We will collect information about you and other members of your household as requested by our online referral process, over the phone or through any forms that you may complete. For example, we collect the following to assist us in processing your application and to verify who we are dealing with:</p>	Full name (including title), age/date of birth, marital status
	Home address and your length of time there.
	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).
	Occupation and employment history which may help us find additional funding.
	Financial details such as income (e.g. salary, benefits) and household expenditure (e.g. rent/ mortgage, utilities) to assess your eligibility.
	Occupier details (for example the number of people living in the property, their date of birth, and any illnesses or health conditions) for assessing eligibility.
	Information about your property's characteristic (for example the number of bedrooms and any heating/insulation installed).
	Physical (such as disabilities, critical illness) or mental health
	Details about benefit entitlements.
	Any additional information you provide in support of you application.

<p>From you about other people:</p>	<p>If you (as a client or as someone who has referred a potential client to us) 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 sensitive information about yourself or others (such as health related information) you agree (and are confirming that the person who the information is about agreed) that we can use the information as set out in this policy. This may happen because you are acting as the representative on the client's behalf or because you want someone else to act as a representative on your behalf. Information about other household members will also be used to assess the overall eligibility of the household</p>
<p>From third parties:</p>	<p>Publicly 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.</p> <p>Other companies or organisations (for example, charities) where you have given them your consent to share your personal information with us so we can see if you are eligible for additional financial assistance.</p>
<p>From our website:</p>	<p>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).</p>

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. You also should let us know if your circumstances change as you may be eligible for additional support.

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 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, if it's in our legitimate interests and for special category data (health) it is in your vital interests.

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 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 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>Cookies 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 We may ask you to participate in market research (such as surveys, participation in focus groups etc.) to help improve the way we provide our services 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 If you request us to disclose your personal data to other people or organisations such as to a relative to deal with your application on your behalf or to a company dealing with a claim on your behalf or you otherwise agree to such disclosures (for example to a charity providing you with additional assistance).</p>

Special categories of personal information

When we process any special categories of personal information at your request (e.g. data concerning your health) we need your consent to do so.

If you consent we will use that information (along with other personal data which you have consented to us using) to assist us in providing the services you have requested (if any), assessing your eligibility for funding, managing your application, for internal performance review, analysis, reporting and audit purposes (both internally and to report to Ofgem) to ensure our compliance with our obligations and to improve our services to you.

We may contact you for customer satisfaction purposes and to see whether you'd be willing to participate in future promotional activity.

We may share your information with agents and service providers (like IT service providers who host npower's databases) who carry out services on our behalf or other companies or organisations such as installers of heating and insulation measures to provide you with a quote and for them to install measures.

We may share your information with other companies or organisations such as charities (including those providing support to people with certain health conditions or who could otherwise provide financial assistance) and local authorities to assess (either through us or directly with you) your eligibility and potentially obtain additional funding. We may co-ordinate with the relevant company or organisation and they may also let us know if the application has been successful. For more information on how they use your information and who they share it with as well as understanding your rights please contact the relevant company or organisation.

	<p>We may share your information with the Department of Works and Pensions to see if you are eligible for additional financial support.</p> <p>We may share your information with other npower group companies to assess your eligibility for additional funding from schemes such as the Energy Company Obligation (ECO).</p>
<p>Vital Interests We may need to share your vulnerable information with third parties because we believe you or someone else's life is in imminent danger. 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>Whether or not you are a client of ours if you are in danger of being cut off and we believe you may need extra help we may record vulnerable information about you.</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) to assist you or them and ensure you or they stay on supply.</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 comply with legal and regulatory requirements including those set out in the relevant gas and electricity Acts, our licence conditions and industry codes which govern how we operate.</p> <p>To provide certain information to Ofgem as regulator for 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.</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>

	To assist you if you exercise your legal rights under data protection law.
	For the establishment and defence of legal rights.
	To verify your identity, make credit fraud prevention and anti-money laundering checks..
<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 resolve complaints and query resolution which go beyond strictly providing our services to 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 to include aspects of your lifestyle, payment history 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 that we are able to make available to you.</p> <p>To test systems to help improve the way we provide our services that we are able to make available to you.</p>

	<p>To monitor emails, calls, other communications, and activities in relation to your application.</p>
	<p>To carry out data enrichment and ensure the information we hold is accurate and up to date.</p>
	<p>Web analytics to analyse and better configure our website.</p>
	<p>To help us identify you so we know who we are talking to and authenticate the information you provide for security purposes. We may potentially check against publically available information such as social media.</p>
	<p>To enable you to access our website to use our services.</p>
	<p>To assess health and safety, environmental and financial risks to you.</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>Sending you service messages such as application related notifications and communications such as terms and conditions changes.</p>

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 use fulfilment companies to send out our service communications to you. We may also share your information with installers to carry out the installation of any heating or insulation measures.
- b** Agents and service providers acting on our behalf to carry out profiling, modelling and analysis, market and customer research, statistical analysis and the testing of our systems to help improve the way we provide our services that we are able to make available to you. These agents and service providers include creative agencies, professional user experience testing agencies and search engine optimisation agents. We do not provide personal information unless it is specifically required for the services they are providing.
- c** Our legal and professional advisors including our auditors.
- d** Our processors and sub-processors who are involved in the hosting, development and testing of our IT systems.
- e** 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.
- f** Home Improvement Agencies, Care and Repair Agencies and other partners (these are currently Foundations Independent Living Trust Limited, Astral PS Ltd, Care and Repair Cymru 2015, Leicester City Council, East Riding of Yorkshire Council, Energy Projects Plus Limited, Bradford Metropolitan District Council, Durham County Council and Derbyshire County Council but change from time to time) who operate the Health Through Warmth scheme in various regions. They may also collect and use your personal information as set out in this policy on our behalf.

- g** 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).
- h** For regulatory purposes to Ofgem (or any organisation which takes over Ofgem's role) or directly to an agent acting on their behalf. They may pass that information to other agencies to be analysed or for other purposes relevant to their request or investigation.
- i** We may share information with companies or organisations such as charities (including those providing support to people with certain health conditions or who could otherwise provide financial assistance), local authorities and the Department of Works and Pensions to see if you are eligible for additional financial support.
- 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.
- l** To other parties connected with your application, 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 application.
- 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.

We use a third party service provider to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the website. We use a Secure Socket Layer (SSL) protocol that provides a secure encrypted connection between you and us (the information is decrypted or put back into readable format when it reaches its destination). When you visit our website you may move in and out of secure areas. If you are requested to provide credit/debit card or bank details or any personal information to sign up to our services you will be in a secured area.

7. Transfers outside the UK and safeguards

Health Through Warmth are based in the UK and do not currently pass personal information to anyone based in countries outside the European Economic Area (EEA).

These countries may not have the same level of data protection as we operate in the UK. If we do transfer or process your information outside of the EEA in the future, we would apply strict safeguards to make sure we keep your information secure. We would 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.

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

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 provide you with the services we have offered you.
- 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, reporting to Ofgem, to meet our licence condition obligations etc.).
- We'll keep your personal information after your measure(s) have been installed by an installer based on our legal and regulatory requirements.

After your measures have been installed by an installer we will retain your information for 5 years unless we require it for longer to meet our legal and regulatory requirements (for example you are in dispute with us). 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 services we are providing to you 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 contacting us on 0800 912 7000 (generally free from most landlines) Monday - Friday 8.30am-4.30pm or Saturday 8am-6pm or emailing us at **healththroughwarmth@npower.com**. Alternatively you can contact the organisation you initially gave your information to.
 - 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 policy 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.
 - ii **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.
 - iii **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.

- iv 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.
- v Rectification** – you can ask us to change or complete any inaccurate or incomplete or incorrect personal information that we hold about you.
- vi 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.
- vii 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 – Rainton House, Individual Rights Team, PO Box 177, Houghton-le-Spring, DH4 5OZ; or
- **Call:** 0800 073 3000 (generally free from most landlines) Monday – Friday 8am-8pm or Saturday 8am-6pm.

c Right to complain

If you are unhappy about the way we handle or use your personal information (or wish to make a complaint about any other Health Through Warmth matter) please write to us at Health Through Warmth, Oak House, Bridwater Road, Worcester, WR4 9FP and we will do our best to resolve your complaint.

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.

Website

10. External links from our website

From time to time we may include hypertext links to sites which are created by individuals and companies outside of our group companies. We do this when there is a particular relevance to the topic you're reading about. Whilst we endeavour to check that the content of these sites is suitable, we unfortunately cannot take any responsibility for the practices of the companies who publish the sites that we link to, nor the integrity of the content contained within them.

This policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

11. Website Search engine

Our website keyword search functionality is powered by npower. Search queries and results are logged anonymously to help us improve our website and Mobile Application (App) search functionality. No user-specific data is collected by us or any third party.

12. Visitors to our websites

When someone visits our website we currently use a third party service provider, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. These analytics enable us to see how people use our website and App and give us the information needed to make improvements and make our website and App easier to use. We also do this to find out things such as the number of visitors to the various parts of the website. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google Analytics to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

13. Cookies

Like most websites, we use “cookies” - small text files that are saved to your device. We test different versions of the website before we finalise changes to ensure that any improvements make it easier to use. Cookies help us to track how a user progresses through sections of our website that we are testing.

More details about cookies, how we use them and how you can disable them can be found at <http://www.npower.com/home/about-npower/cookies/>.

14. Data Retention, Managing your information on our website

We will retain data you have provided to us, including journey information and device model, to monitor the performance of our website and identify any problems. All data is completely anonymous and can't be used to identify the user in any way.

15. Updates and Changes to this Privacy Policy

This policy was updated in May 2018 and it replaces any previous policies 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 policy 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.

Phone calls: We may monitor and/or record calls for security, quality or training purposes. Calling us on an 0800 number should be free from all mobiles and generally free from all landlines. Calling us on a 0330 number will cost you no more than 01 or 02 numbers from landlines or mobiles. If you get 'inclusive minutes' with your package, calls to a 0330 number will be part of these.

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