

# **Npower ECO Scheme Privacy Notice**

## **Using your personal information**

This is npower's Privacy Notice relating to the personal data we process under the ECO Scheme. It is aimed at people who have applied for an ECO Measure in their home.

We may receive personal information directly from you where you've applied to us (through our website or via a third party, for example) to deliver an ECO Measure in your home, or it could be provided to us from a third party (for example, an installer, a broker or a local authority) who has dealt with your application and/or the installation of your ECO Measure itself and has passed the information to us in order to assist us in fulfilling our obligations under the ECO Order.

We would encourage you to read this Privacy Notice thoroughly so you know how we use your information and who we share it with, as well as helping you to fully understand 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

This Privacy Notice relates to how we use your personal information whilst delivering our obligations under the Electricity and Gas (Energy Company Obligation) Order 2014 (SI 2014/3219), as amended or replaced from time to time, which we refer to within this Privacy Notice as the “**ECO Order**” and, more generally, the “**ECO Scheme**”.

Under the ECO Scheme, obligated energy suppliers (including npower) are under a duty to promote and deliver certain energy-efficient measures, such as boiler replacements, wall insulation and loft insulation, in accordance with the rules and guidelines of the ECO Scheme which is current at the time (referred to below as “**ECO Measures**”).

Your personal information (also known 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. This Privacy Notice sets out how we collect, store, share and use the personal data 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 Limited  
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 Privacy Notice.

In addition, you have certain rights relating to your personal data. See the section on ‘*Your Rights*’ and how our Individual Rights Team can help you. If you have any other questions about this Privacy Notice, feel free to contact us using the details set out in Section 12.

## 2. Who Is Npower and How Can You Contact Us?

When we refer to “**npower**”, “**we**”, “**us**” or “**our**”, we mean Npower Northern Limited and its group companies.

### **The current list of npower group companies is:**

Innogy SE (registration number Hrb27091)  
Innogy Business Services UK Limited (company number 06052966)  
Npower Group plc (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 (9850654)

The correspondence address of innogy SE is Opernplatz 1, 45128 Essen, Germany and its registered address is Handelsregister B Des Amtsgerichts, Essen, Germany.

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

We are what is known as a “**controller**” of the personal information we collect and use about you. This means that we are responsible for ensuring that information is protected in accordance with this Privacy Notice and the law.

As some of 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 on our website at [www.npower.com](http://www.npower.com).

### 3. Information We Collect About You

We need certain personal information about you in order to deliver our obligations as part of the ECO Scheme.

We may obtain such information directly from you (for example, where we speak to you or via our website if you complete an online form/application). Alternatively, we may receive some or all of your information from a third party organisation or another person.

Where it's optional to provide certain information to us, we'll let you know, including where we require your consent to use your information for specified purposes.

The table below shows the type of information we collect about you, by whom, how we use it and why.

<b>HOW WE COLLECT AND USE YOUR INFORMATION</b>	<b>TYPES OF INFORMATION</b>
<p><b>Information we collect from you or a member of your household as customers under the ECO Scheme:</b></p> <p>Where you have contacted us directly to enter into a contract with us to deliver an ECO Measure, we will collect information about you and other members of your household to assess your eligibility and to deliver our obligations under the ECO Scheme.</p> <p>You will provide us with certain information as requested by our online sign up process, over the phone or through any forms that you may complete.</p>	Full name (including title)
	Home address (which could be just the postcode or the full address where necessary)
	Date of birth (where necessary)
	Contact details such as 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).
	Where we deliver your ECO Measure directly, we may ask for your credit or debit card details if you need to pay a financial contribution for your ECO Measure through those means. If someone else has agreed to pay this contribution on your behalf, then we will use their details instead of yours. We do not record the part of a phone call where payments are taken in order to keep the payment secure.
Details about benefit entitlements to check that you are eligible for the ECO Scheme.	

	Physical or mental health information for assessing eligibility or vulnerability where we believe that this is necessary.
<b>Information we receive from you about other people:</b>	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.
	You may provide us with information relating to other people who live with you, especially if they are in receipt of benefits that are required for your eligibility on the ECO Scheme.
	If you live in privately rented accommodation, you will be asked to provide us with information relating to your landlord. We will then contact your landlord to ascertain certain details about you and your tenancy in relation to evaluating your property and your eligibility to receive an ECO Measure under the ECO Scheme.
	If you have provided any sensitive information about yourself or others (such as health-related and/or benefits information), you agree (and are confirming that the person who the information is about has agreed) that we can use the information as set out in this Privacy Notice. This may happen because you are acting as the representative on the customer's behalf or because someone who is living with you requires additional support that we are able to offer.
<b>Information we receive from third parties</b>	We may receive personal data referred to above about you or others from third parties, such as our managing agents, the Energy Savings Trust or local authorities, who will pass your details onto us in order to meet our obligations under the ECO Order.
	We may receive personal data referred to above about you or others from installers who have carried out an ECO Measure at your home and who will pass your details onto us in order to meet our obligations under the ECO Order.
	In order to check your eligibility for ECO Measures, we (or the third parties who subsequently share such information with us) have to verify certain information with other organisations, such as the Department of Work and Pensions and/or the Land Registry. This may include health information.
	Landlords or letting agents who own or manage your home may provide your details so that we (or the relevant third party) can establish

	<p>whether you are eligible for the ECO Scheme.</p> <p>Other third parties, like technical monitoring agents, surveyors, auditors or other service providers who are contracted by us to provide services to you on our behalf or to assist us with our legal and contractual obligations, will share information with us.</p> <p>We may receive information from credit reference or fraud prevention agencies and other publically available information (see below) to identify you, to investigate potential fraud or where we need to trace you or people linked to you for some reason under the ECO Scheme.</p> <p>We may use 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.</p> <p>Third parties may share your information with us in order for us to deliver our obligations under the ECO Scheme, such as the Energy Saving Trust or third party brokers, where you give your details to them in relation to their products and services offered through their websites or contact centres, or where they refer personal data to us in order for us to meet our obligations under the ECO Scheme.</p> <p>Other companies or organisations could give us your information where you have given them your consent to share your personal information with us so we can see if you are eligible for the ECO Scheme.</p>
<p><b>We may also collect:</b></p>	<p>Information about your property's characteristics (for example, its age, number of bedrooms, photographs necessary for the installation or managing a complaint etc.) to consider the suitability of the ECO Measures (including for auditing and technical monitoring purposes).</p> <p>Occupier details (for example the number of people living in the property) for assessing things like vulnerability and providing you with appropriate products and services or extra assistance.</p> <p>Information about other products and services that you have with us so we can target our communications with you more effectively.</p>
<p><b>From our website:</b></p>	<p>We collect certain data automatically from your visit to our website (<a href="http://www.npower.com">www.npower.com</a>). This may include but is not limited to some or all of the following: how you connect to the internet</p>

(including IP addresses), how you engage with our website, browser data stored on your device (for example cookies – see our Cookie Policy online at [www.npower.com](http://www.npower.com)).

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

We can only use your personal information where we are permitted to do so by data protection laws. Those laws require that, where we use your personal information, we must satisfy one condition (called a “**legal basis**”) for processing.

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

- We will also use this information as necessary for our own legitimate interests or those of another organisation or person, including:
  - For good governance, accounting, managing and auditing our business operations
  - To monitor calls, emails and other communications in relation to your application/ECO Measure
  - To send you marketing communications for products and/or services (from us or from third parties) that we think will be of interest to you
  - For statistical, analytical or market research purposes
- In addition to the above, where we have obtained your consent to collect and use some of your information for the purposes communicated, we can rely on your consent.

LEGAL BASIS FOR PROCESSING	PROCESSING ACTIVITY (PURPOSES)
<p><b>As necessary to fulfil a legal obligation</b></p> <p>This is where we are required to do something by law, regulatory requirement or by way of a court order.</p>	<p>Complying with our legal and statutory obligations under the ECO Order and all associated laws/guidelines.</p>
	<p>Running our business in an efficient and proper way, which includes managing our financial position, business capability, planning, communications, corporate governance and audit.</p>
	<p>Complying with legal and regulatory requirements including, where relevant, our licence conditions and industry codes which govern how we operate.</p>
	<p>Providing certain information to Ofgem as regulator for the energy industry, either as part of the administration of the ECO Scheme, an investigation by them, a request for information or an audit of our services and activities.</p>
	<p>Providing information 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>Assisting you if you exercise your legal rights under data protection law.</p>

	Establishing and defending legal rights.
	Verifying your identity and making fraud prevention and anti-money laundering checks.
<p><b>Performance of our contract with you</b></p> <p>Where you have entered into a contract directly with us for the delivery of an ECO Measure, the information described above will be provided to us for the following purposes.</p>	Checking your eligibility for the ECO Scheme where you contact us directly and, where applicable, arranging a technical survey and providing you with a quote.
	Helping us identify you so we know who we are talking to and authenticating the information you provide for security purposes. We may check against information we already hold about you as an energy supplier and potentially publically available information, such as social media.
	Delivering the ECO Measure and performing our obligations to you under the contract.
	Sending you service messages, such as appointment reminders.
	Enabling you to access our website to use our services.
	Assessing health and safety, environmental and financial risks to you.
	Providing and improving customer support.
	Resolving complaints and query resolution.
	Training our staff and monitoring 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><b>As necessary for our own legitimate interests (or for those of another person or organisation)</b></p> <p>This is where we use your personal information for 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 <i>'Your Rights Relating to the Personal Information We Hold About You'</i> then <i>'Right to Object'</i></p>	Carrying out performance reviews, monitoring, 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 statistical analysis to assist us in ensuring we can comply with legal and regulatory requirements, as well as to help improve the way we provide our services and the products that we are able to make available to you.
	Testing systems to help improve the way we provide our services and the products that we are able to make available to you.
	Monitoring emails, calls, other communications and activities related to you and the ECO Measure you've received or applied for.

	<p>Carrying out data enrichment and ensure the information we hold is accurate and up to date.</p> <p>Reporting to and paying our referral partners, such as third party brokers, managing agents and lead generators.</p> <p>Web analytics to analyse and better configure our website.</p> <p>Taking part in government or industry initiatives (for example, to tackle fuel poverty, improve energy efficiency or other social or consumer interests).</p> <p>Sending you marketing communications for products and/or services (from us or from third parties) that we think will be of interest to you, especially where we are unable to provide a product or service (including an ECO Measure) that you have applied to us for.</p>
<p><b>Consent</b></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 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 <i>'Your Rights Relating To the Personal Information We Hold About You'</i> and <i>'Your Right To Withdraw Consent'</i></p>	<p><b>Cookies</b></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 <a href="http://www.npower.com">www.npower.com</a> for more information.</p> <p><b>Marketing</b></p> <p>From time to time, and if you have agreed, we may provide you with marketing information relating to customer promotions and competitions about our products and services, as well as offers from our partners, including by phone, text message, email and via e-marketing (i.e. using the internet and digital media technologies, such as social media), which we think may benefit you in your everyday life.</p> <p>We ask for consent when you sign up with us but you can change your mind at any time.</p> <p><b>Market research</b></p> <p>We may ask you to participate in market research (such as surveys, participation in focus groups etc.) to help improve the way we provide the services and products that we are able to make available to you. If you agree, your feedback is given with your consent.</p> <p><b>Where you agree to the disclosure</b></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 a company dealing with a claim on your behalf, or where you otherwise agree to such disclosures (for example, to a</p>



	<p>charity providing you with debt assistance), we will usually rely on the consent you have given us. For certain disclosures, however, we rely on a different legal basis for processing and sharing your information.</p>
	<p><b>Sensitive information</b></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), we will take extra precautions in relation to the sensitivity of this information.</p> <p>As well as relying on another legal basis for processing such information, we may also ask for your explicit consent. as an extra way of ensuring that your data is protected.</p>
<p><b>Vital interests</b></p> <p>We may need to share your vulnerable information 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 for some reason whilst using your personal information 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 to ensure that your vital interests are protected.</p>
<p><b>Sensitive information and substantial public interest</b></p>	<p>Where we (or others who share your information with us) process certain sensitive information about you (e.g. health data in relation to the benefits you receive), we may rely on the substantial public interest involved as an additional condition for processing that data.</p> <p>For example, npower is obligated under the ECO Order to provide funding for the ECO Scheme. The ECO Scheme is aimed at certain households whose residents are considered to be in extra need of benefitting from the ECO Measure in their home and who may not otherwise be able to fund the ECO Measure themselves.</p> <p>It's usually necessary to check eligibility based on benefits received, and this can contain sensitive information which may include details about a person's health. Health information is considered to be 'special category' data under the law and requires further protection.</p> <p>However, due to the legal functions conferred on us to fund ECO Measures and meet our obligations under the law, it's in the public interest to ensure (and we are legally required to ensure) that ECO Measures are delivered to those who are eligible and obtaining the best use of our funding.</p> <p>We will only use special category data in a way that's proportionate and that respects your rights to data</p>

protection.
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## **5. Sharing Your Information**

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

- a. Agents and services providers (including subcontractors) to carry out the ECO-related services on our behalf (such as surveyors, assessors, installers or technical monitoring agents).
- b. Agents and service providers (such as IT service providers, including those 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), and use fulfilment companies to send out our service and marketing communications to you. We may also pass on your information to third parties and partners to fulfil promotional offers you have asked for.
- c. 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 and the products 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.
- d. Our legal and professional advisors, including our auditors.
- e. Our processors and sub-processors who are involved in the hosting, development and testing of our IT systems.
- f. 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.
- g. Relevant industry organisations and agencies who operate and maintain databases on behalf of the industry to assist in the delivery of the ECO Scheme or the provision of industry data analytics to improve or enhance the energy efficiency in the energy market and/or to improve or enhance the efficiency of our operations compared to other energy suppliers.
- h. If we suspect you have (or someone connected to you has) committed fraud, we'll record those details on your account and may share that information with Ofgem, the Department for Work and Pensions and other interested parties, such as other energy suppliers, landlords, housing associations, fraud prevention agencies and other organisations involved in crime and fraud prevention (such as the police) who may also use this information (see the section on 'Fraud Prevention' below).
- i. 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 or the ECO Scheme is working); for example, by a lawyer or Ofgem or to the Information Commissioner (if we receive a legitimate request for the information).
- j. 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 (for example, ones aimed at helping people who cannot afford to pay for their heating and electricity). They may pass that information to other agencies, government departments or organisations to be analysed or for other purposes relevant to their request or investigation.
- k. We may share your vulnerable information with Social Services, and with medical and healthcare professionals or other similar support agencies where there is a legal basis to do so.
- l. We may share information with the Department of Works and Pensions and other organisations if you have agreed to us doing so to see if you are eligible for additional financial support.

- m. We may share information with Members of Parliament, journalists, Citizens Advice, the Energy Ombudsman or your legal representatives or other agents acting on your behalf if you have asked them to assist you in dealing with a complaint.
- n. If someone else has agreed with you that they will pay your financial contribution for an ECO Measure and has provided their payment details to us, we will only share your personal information with them (and vice versa) insofar as is strictly required to assist in making those payments.
- o. If an organisation takes over all (or nearly all) of our business or assets, we may pass your personal information to them.
- p. To other parties connected with your ECO 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 or complaint).
- q. 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. Fraud Prevention**

- a. If we suspect that someone has committed fraud, we will record this information on your file and we may share this information (including occupier details, property type and benefits data (which may include details health information)) with Ofgem or other industry bodies in accordance with agreed industry processes and the information may continue to be used even following termination of our agreement with you.
- b. We may use any information we have collected to (where relevant and appropriate) detect, investigate, pursue (including prosecute) and prevent (insofar as possible) fraud.
- c. If we suspect or confirm that you have committed fraud, a record of this will be kept by us and any relevant third party. This information may be used to assist decision-making about you, your payment arrangements and the products and services that you may be offered in the future.

## **7. Automated Decision Making and Profiling**

We sometimes use your personal information in automated processes to make decisions about you, such as credit scoring where this is necessary. We may also use an automated process to create a profile of you. Automated decision making involves processing your personal information without human intervention to evaluate things like your financial situation, personal preferences, interests or behaviour (for example, where we wish to send you more targeted marketing communications in accordance with your marketing consent).

### **Profiling for Marketing**

We want you to get the most relevant information about products and services we think may be of interest to you at the right time. The most effective way for us to do this is to use automated processes to create a profile of you for marketing.

To do this, we use information you give to us, information we obtain in relation to how you have used other products and services you have with us, your feedback (if any), as well as information we have obtained from credit reference agencies and other external data sources like Experian who provide us with customer insights.

We use an analytical program that collates the information we hold and analyses it to create models based on previous promotions to decide what products and services to offer to you and to prioritise the marketing messages you receive by: assessing your eligibility; assessing how likely the products and services are to be useful for you; and deciding how likely you are to

respond. This information is not used to make any specific decisions about you as an individual.

All this activity is carried out on the basis of our legitimate interests to operate our business and to develop and improve our products and services.

## **8. Security**

We take the security of your personal information very seriously and we 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, where you use those to communicate with us or to receive services from us, this will be 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 products and services, you will be in a secured area.

## **9. Transfers Outside the UK and Safeguards**

Although we are based in the UK, we 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 or 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 and other relevant third parties backed by strong contractual undertakings approved by the relevant regulators; for example EU Model Clauses. Visit the ICO website [www.ico.org.uk](http://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](http://www.privacyshield.gov) for more information.

## 10. Retention Periods

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 products and services you have signed up to.
- 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.). Under the ECO Scheme, we are required to keep certain records for 7 years after the scheme applicable to your ECO Measure (e.g. ECO1, ECO2 etc.) closes.
- 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.

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 appropriate means.

## 11. 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.
- Right to withdraw consent** – if you've given us consent to process your personal information and we are relying on that consent as a legal basis to use such information, you have the right to withdraw that consent at any time by utilising the available unsubscribe options to marketing emails or texts or by calling us on 0800 072 1740 or emailing us at [energyimprovements@npower.com](mailto:energyimprovements@npower.com). Calls are free from mobiles and generally free from most landlines and lines are open Monday – Friday 8am – 8pm.
  - Right to be informed** – you are entitled to be told about the collection and use of your personal information. This is achieved by this Privacy Notice which set outs what data we collect, how we use it and who it is shared with, 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 or via our online journey, for example.
  - 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.
  - 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 (where the only legal basis for us processing your information is your consent) or we have no lawful basis to keep it.
- v **Rectification** – you can ask us to change, complete or rectify any inaccurate, 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 where you have objected to our use of it.

b. You may exercise any of the rights set out above by:

- **Writing to us at:** Energy Improvements Team, npower, Oak House, Bridgwater Road, Worcester WR4 9FP
- **Calling us on:** 0800 072 1740  
(Monday to Friday 8am to 8pm – calls are free from mobiles and generally free from most landlines); or
- **Emailing us at:** GD&Ocomplaints@npower.com

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 Limited  
Legal Department  
Trigonos  
Windmill Hill Business Park  
Whitehill Way  
Swindon  
SN5 6PB

If you wish to make a complaint about any other matter, please see the details on how to complain on our website at [www.npower.com/ecoterms](http://www.npower.com/ecoterms).

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](http://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

**Our Website**

## **12. 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, unfortunately, we 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 Privacy Notice does not cover the links within our site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **13. 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 search functionality. No user-specific data is collected by us or any third party.

## **14. Contacting Us Via Social Media**

We use a third party provider, Lithium Technologies, to manage our social media interactions. If you send us a private or direct message via social media, the message will be stored in accordance with Section 10. It will not be shared with any other organisations.

## **15. 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 give us the information needed to make improvements and make our website 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.

## **16. 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/>.

## **17. Data Retention and 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 to identify any problems. All data is completely anonymous and can't be used to identify the user in any way.

This data will be retained within the website when the device is not connected to the internet, and then sent to the Google Analytics Data Servers when reconnected.

## **18. Updates and Changes to this Privacy Policy**

This Privacy Notice 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 Privacy 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.