

Data Privacy Statement General Data Protection Regulation

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controllers' possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the 'GDPR') which comes into effect on 25th May 2018.

How do we process your personal data?

President Energy Plc complies with its obligations under the GDPR by keeping personal data up to date, by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

President Energy Plc will collect personal data directly from you as the data subject and may on occasion also collect relevant data from 3rd parties. We may monitor, record, store and use any telephone, email or other communication with you. Any new information you provide may be used to update an existing record we hold for you.

We may use **your** personal data for a number of different purposes including the following:

- To generate, manage and administer any contract you may have with **us**
- To keep you informed (by mail, email, telephone or otherwise) of relevant offers and products and services we consider may be of interest to you, unless you have opted out of receiving these;
- To obtain any relevant quotations for you where appropriate;
- To comply with our legal obligations, co-operate with the court service, our regulators and law enforcement agencies and to prevent and detect crime;
- To transfer information to the Official Receiver or appointed insolvency practitioner if we receive notification of any bankruptcy or insolvency proceedings;
- To check instructions, you have provided or resolve disputes and complaints;
- To improve the quality of the service we provide and train our staff;
- Aggregating data for analysis and research and to provide management information internally or to the Group.

What is the legal basis for processing your personal data?

Under Article 6 of the GDPR, the legal basis that **President Energy Plc** employs for processing **your** personal data may include one of the following:

- Where contractually it is needed to provide you with our products or services;
- Where it is in our legitimate interests to do so;
- To comply with our legal obligations;
- With your consent.

Usually the legal basis will be contractual in that the processing of **your** personal data is necessary for the performance of a contract to which **you**, the 'data subject' is party, or in

order to take preparatory steps at **your** request prior to entering into such a contract.

Sharing your personal data

Your personal data will be treated as being strictly confidential and will never be shared without **your** consent.

All the personal data that **we** hold about **you** will be processed by **our** staff in the United Kingdom, and no third parties (other than Group Companies wholly owned by President Energy Plc) will have access to **your** personal data without **your** consent, or unless there is a legal obligation for **us** to provide them with this information. Please be aware however, that **your** personal data may be stored on cloud-based systems whose servers may or may not be located within the European Union.

Processing personal data outside of the EU

Where possible, we only process your information within the European Union (EU), which includes the UK, as we share similar standards of legal protection. We may send your data outside of the EU; however, we will always ensure it is processed and handled in line with the UK Data Protection Act 1998. Instances where we will transfer your data outside of the EU include:

- processing international payments; or
- disclosures to foreign authorities to reduce financial crime and terrorism.

How long do we keep your personal data for?

We will keep your personal information for as long as you are a customer or user of the services of **26 Months** and/or the Group. After you stop being a customer, we may keep your data for one of these reasons:

- To respond to any questions or complaints;
- To maintain records according to rules that apply to us.

We may keep your data if we cannot delete it for legal or regulatory reasons. We may also keep it for statistical purposes. If we do, we will make sure that privacy is protected, and the data only used for those purposes.

We will keep **your** personal data securely, and it will be destroyed securely if it is no longer needed for the lawful purposes for which it was obtained.

If **you** consent to receiving marketing from **us**, any information **we** use for this purpose will be held by **us** until such time as **you** notify **us** that **you** no longer wish to receive marketing information from **us**.

Your rights and your personal data

Unless subject to an exemption under the GDPR relating to a particular lawful basis used, **you** may have the following rights with respect to **your** personal data:

- to request a copy of **your** personal data which President Energy Plc holds about **you**;
- to request that President Energy Plc corrects any of **your** personal data if it is found to be inaccurate or out of date;
- to request **your** personal data to be erased where it is no longer necessary for President Energy Plc to retain such data;
- to withdraw **your** consent to the processing of **your** personal data at any time;
- to request that President Energy Plc provides **you** with **your** personal data, and where possible, to transmit the data directly to another data controller (known as the right to data portability);
- where there is a dispute in relation to the accuracy or processing of **your** personal data, to request a restriction is placed on further processing;
- to object to the processing of **your** personal data with regards to Direct Marketing;
- to lodge a complaint with the Information Commissioner's Office (ICO).

Access to your information and correction

You have the right to request a copy of the information that **we** hold about **you**. This is called a Subject Access Request. If **you** would like a copy of all or some of **your** personal information, please email or write to **us** at the addresses provided in the "Contact Details" section of this Data Privacy Notice. In some exceptional cases, **we** may make a small charge for this service (for example multiple claims for the same information) but usually this data will be provided free of charge.

We want to make sure that **your** personal information is accurate and up to date. **You** may ask **us** to correct or remove information **you** think is inaccurate.

Marketing

We would like to send **you** information about products and services of **ours** and other companies within **our** group which may be of interest to **you**. If **you** have consented to receive marketing, **you** may opt out at a later date.

You have a right at any time to stop **us** from contacting **you** for marketing purposes or giving **your** information to other entities within **our** group. If **you** no longer wish to be contacted for marketing purposes, please email or write to **us** at the addresses provided in the 'Contact Details' section of this Data Privacy Notice.

Further processing

If **we** wish to use **your** personal data for a new purpose, not defined by this Data Privacy Notice, then **we** will provide **you** with a new notice explaining this new use prior to the commencement of the new processing and setting out the relevant purposes and processing

conditions. Where and whenever necessary, **we** will seek **your** prior consent to the new processing.

Contact Details

To exercise all relevant rights, or to raise queries or complaints, please in the first instance contact: **The Data Protection Officer.**

By email:

compliance@presidentpc.com

By post:

President Energy Plc, 1200 Century Way, Thorpe Park Business Park, Leeds, LS15 8ZA

By telephone:

+44 (0) 20 7016 7950

You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or by post at The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Cookies policy

1. Introduction

- 1.1 Our website uses cookies.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. If you continue to use the website, then we will understand that you consent to our use of cookies on your device.

2. About cookies

- 2.1 A cookie is a small data file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Most website operators place cookies on the browser or hard drive of their user's computer.
- 2.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 2.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies and can give you a more personalised web experience.
- 2.4 Cookies gather information about the user's use of the website or enable the website to identify and track users as they navigate different pages on a website and identify users returning to a website. Cookies can also be used to collect information about the user which allows the website operator or a third party to create a profile of the

user, their preferences and their interests for the purpose of serving the user with targeted, interest-based advertising.

3. Our cookies

- 3.1 Cookies help us to provide customised services and information. We use cookies on our website to tell us, in general terms, how and when pages in our website are visited, what our users' technology preferences are and whether our website is functioning properly. If you are using one of our password-protected sites, then the website may use cookies or other technology to help us authenticate you, store and recognise your configuration and user attributes, facilitate your navigation of the website and customised its content so that the information made available is likely to be of more interest to you.
- 3.2 If you wish to know the retention period for data captured through these cookies, please contact the data protection officer.
- 3.3 Please note that third parties (such as providers of external services like web traffic analysis services) may also use cookies over which we have no control. These cookies are likely to be analytical / performance cookies or targeting cookies.
- 3.4 We may collect non-personal identification information about visitors whenever they interact with our website. Non-personal identification information may include the browser name, the type of computer and technical information about visitors means of connection to our site, such as the operating system and the Internet service providers utilized and other similar information.
- 3.5 We do not sell, trade, or rent users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.
- 3.6 Reasonable steps have been taken to protect this website by antivirus software, but all visitors are advised to take all necessary steps to ensure that no virus contamination occurs. No responsibility can be accepted for any loss or damage sustained as a consequence of any virus transmission.

4. Analytics cookies

- 4.1 We use Google Analytics to analyse the use of our website.
- 4.2 Our analytics service provider generates statistical and other information about website use by means of cookies.
- 4.3 The information generated relating to our website is used to create reports about the use of our website.
- 4.4 Our analytics service provider's privacy policy is available at: <https://www.google.com/policies/privacy/>.

5. Blocking cookies

- 5.1 Most browsers allow you to refuse to accept cookies; for example:
 - (a) in Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then

"Advanced".

5.2 Blocking all cookies will have a negative impact upon the usability of many websites.

6. Deleting cookies

6.1 If you wish to remove cookies set by our website from your browser in the future, you may delete them. The instructions for removing cookies from your computer or mobile device depends on the operating system and web browser you use. You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at <https://support.microsoft.com/kb/278835>).

6.2 Please note, however, that withdrawing your agreement to the use of cookies on our sites will impair the functionality of the website.

7. Our details

7.1 This website is owned and operated by President Energy Plc.

7.2 Our contact details are:

To exercise all relevant rights, or to raise queries or complaints, please in the first instance contact: **The Data Protection / Compliance Officer**.

By email:

compliance@presidentpc.com

By post:

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By telephone:

+44 (0) 20 7016 7950