

## Privacy Statement and Cookies Policy

Last update October 23<sup>rd</sup> 2015

This Privacy Statement and Cookies Policy (the "**Privacy Policy**") is located on the website, [www.prepaypower.ie](http://www.prepaypower.ie) (the "**Website**") and inside mobile app 'PrePayPower' (the "**Mobile App**"). The Website and the Mobile App are operated by PrePayPower Limited (registered number 467144), a limited liability company, incorporated in Ireland whose registered office is at 2<sup>nd</sup> Floor, Paramount Court, Corrig Road, Sandyford, Co. Dublin and all of its direct and indirect subsidiaries ("**we**" or "**our**" or "**the Company**"). This Privacy Policy (together with our Terms of Use and any other documents referred to in such Terms of Use) sets out the basis on which any personal data we collect from you, or that you otherwise provide to us, will be processed and used by us and applies to all of your personal data irrespective of the medium or method by which we obtained / received your personal data. Please read the following carefully. Entering into the Website, the Mobile App and/or by providing us with your personal data by other means indicates that the user (either "**user**" or "**you**") has either reviewed this Privacy Policy or been given an opportunity to review this Privacy Policy and has agreed to be bound by it as well as our Terms and Conditions. If you do not agree to these terms you must leave the Website and Mobile App immediately and / or send us a written request to delete any personal information on you otherwise you give us permission to use your personal data in accordance with this Privacy Policy. Please note that we may not be in a position to provide you with services if we cannot use your personal data.

### What information do we collect?

We fully respect your right to privacy in relation to your interactions with us via the Website, the Mobile App and over the phone and in any other form of communication with the Company and endeavour to guarantee to be transparent in our dealings with you as to what information we will collect (such as your name, customer account number, MPRN, date of birth, address, phone number/secondary phone number and email address and preferences), and how we will use your information. Also, we only collect and use individual user details where we have legitimate business reasons, and where we are legally entitled to do so.

Further information in relation to personal data collected by Irish entities is available on [www.dataprotection.ie](http://www.dataprotection.ie), the website of the Irish Data Protection Commissioner.

The Company complies with the Data Protection Acts, 1988 and 2003 (the "**DPA**") and any other locally applicable data protection legislation.

### How do we collect information from you?

- **IP Addresses**

We automatically collect IP addresses from visitors to our Website and Mobile App (an IP address is a number that can uniquely identify a specific computer or other network device on the internet) and log these IP addresses as part of the connection of your computer to the Company's web server. This allows us to identify the location of users, to block disruptive use and to establish the number of visits from different countries. We analyse this data for trend and statistics reasons, such as which parts of our Website users are visiting, how many times and how long they spend there.

- **Cookies**

We collate information on all our Website and Mobile App traffic that is represented in aggregate format through cookies. A cookie is a small text file that is placed on your hard disk by a web server which

enables a website and/or mobile app to recognise repeat users, facilitate the user's ongoing access to and use of the Website and/or the Mobile App and allows the Website and/or Mobile App to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. A cookie will not provide us with personal information, therefore if you have not supplied us with any personal information you can still browse the Website anonymously. We use third parties such as i.e. Google Analytics to collect user information, including through the use of cookies (flash and non-flash) and web beacons. They help us to improve our Website and to deliver many of the functions that make your browser experience more user friendly. You can find a list of cookies we use and the purposes for which we use them in the table below. Additional cookies will be added from time to time.

**THIRD PARTY COOKIES**

There are cookies which are found in other companies' internet tools which we are using to enhance the Website. You will see 'social buttons' on our Website, which enable you to share or bookmark the web pages.

PROVIDER	NAME	PURPOSE	MORE INFO
Google Analytics	Performance Cookie	First party	To provide insights and collect information about how visitors use our website and mobile app.
Google Analytics – Display Advertiser Feature Enabled	Advertising Cookie	First party	This enables Google Analytics to collect data about our Website and Mobile App traffic via Google advertising cookies and anonymous identifiers, in addition to data collected through a standard Google Analytics implementation. Third-party vendors, including DoubleClick (owned by Google), then use the cookies to serve ads on sites across the internet based on someone's past visits to the PrePayPower website and/or mobile app. If you wish, you can opt-out of interest-based ads by Google through <a href="#">Google Ad Settings</a> . Please note that when you opt out, you'll still see ads but they may not be related to factors such as your interests, previous visits to other websites, or demographic details.
Google Adwords Conversion Tracking & Remarketing	Advertising Cookie	Third party	The Adwords 'Conversion Tracking' service is used to measure the advertising performance of Adwords campaigns. The Adwords 'Remarketing' service is used to advertise to previous visitors of the PrePayPower website on third party websites (including Google) by using cookies. This could be in the

			form of an advertisement on the Google search results page, or a site in the Google Display Network. Any data collected is used in accordance with our own privacy policy and Google's privacy policy. If you wish, you can opt-out of these interest-based ads by Google through <a href="#">Google Ad Settings</a> . Please note that when you opt out, you'll still see ads but they may not be related to factors such as your interests, previous visits to other websites, or demographic details.
DoubleClick	Advertising Cookie	Third party	Google's DoubleClick products provide ad management and ad serving solutions to companies that buy, create or sell online advertising. Users may opt-out of Doubleclick's use of cookies by visiting the <a href="#">Doubleclick opt-out page</a> .
DoubleClick Floodlight	Advertising Cookie	Third party	To track and report on advertising conversions.
Right Media	Advertising Cookie	Third party	To provide ad management and ad serving solutions.
Adroll	Advertising Cookie	Third party	Enables Adroll to identify your device when you move between different websites and applications, so that targeted advertising can be served to you. Users may opt-out of Adroll's use of cookies by visiting the <a href="#">Adroll opt-out page</a> .
Feedbackify	Performance Cookie	Third Party	When you submit feedback via the feedback button on our website this cookie provides us with information about your visit and computer (including IP address) to help us qualify the feedback that you have given us.
Google Tag Manager	Cookie Management	N/A	Allows us to manage tags using an interface. It is a cookie-less domain and does not collect any personally identifiable information.
Crashalytics	Performance SDK	N/A	Crashalytics automatically collects certain information that does not personally identify End Users who use

			the Mobile App. This information includes, but is not limited to, device state information, unique device identifiers, device hardware and OS information, information relating to how an application functions, and the physical location of a device at the time of a crash.
Intercom	Usage Analysis & Communication Tool	Permanent cookie and session ID	Intercom tracks and collects End User Customer usage information on our mobile app. This information includes the name, email address, mobile number and customer account number of a customer using the mobile app. We use this information to monitor and analyse use of the Mobile App, to troubleshoot any issues a customer may be having, to communicate with customers via push notifications and in-app messages, to increase our Mobile App's functionality and user-friendliness, and to better tailor it to our customer's needs.

By using the Website, the Mobile App and / or accepting our Privacy Policy we assume that you are agreeing to the placement of cookies on your device unless you specifically choose not to receive cookies. The **Help** menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-on's settings or visiting the website of its manufacturer. For more information about cookies and managing them, including how to turn them off, please visit [www.cookiecentral.com](http://www.cookiecentral.com). However, because cookies allow you to take advantage of some of the Website's and the Mobile App's essential features, we recommend you leave them turned on as otherwise you may not be able to fully experience the interactive features of this or other websites which you visit.

If you wish to opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

- **Registration Process**

To register as a customer or if you wish to enquire about our services we need to collect information via our Website or over the phone or any other form of communication such as, at a minimum, your name, email address and a password. We may also ask some further questions so we can gain a clearer understanding of what you are interested in, in order to personalise the information we give you. (You can update your personal information held and change your stated interests. You may unsubscribe from certain updates by emailing [optout@prepaypower.ie](mailto:optout@prepaypower.ie)). We may ask different questions for different services. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- **Mobile Devices**

Applications developed in connection with the Website for mobile devices will operate and capture information as set out above. Applications developed by us but deployed on other platforms such as social media channels may provide feedback to us on activity and usage specific to a user.

#### **How do we use the information we collect?**

We collect different types of information about our users for the following reasons:

1. For activities relating to the provision of prepaid electricity services. This includes activities such as meter installation, switching of your electricity supply and monitoring top ups and electricity usage for revenue assurance and fraud prevention purposes.
2. to personalise the way our content is presented to you (including advertisements) and to ensure that content from our Website is presented in the most effective manner for you and for your computer and to provide the services or carry out the transaction you have requested;
3. to help us to monitor and improve the services we offer, including the Website, the Mobile App, over the phone and to develop new services. As part of this, we may use and disclose information in aggregate (so that no individuals are identified);
4. to process, validate and verify requests for services and for the purposes for which you specifically provided the information;
5. we may use the information to verify with third parties (such as councils or property owners) that appropriate permissions have been obtained in relation to the transfer of electricity supply and installation of a meter.
6. to carry out any legal obligations arising from your interaction with the Website and the provision of our services to you; and
7. to allow you to participate in interactive features of our service, when you choose to do so.

We may also use your data, or permit selected third parties to use your data, to provide you with information about services which may be of interest to you including special offers and we or they may contact you about these. By accepting this Privacy Policy, you agree to be contacted by any such third parties.

The data that we collect from you may be transferred to, and stored by the Company. It may also be processed by staff of the Company. By submitting your personal data, you agree to this transfer, storing or processing of your data by the Company.

## **Are there cases where we may use your information to contact you?**

We may contact you:

- as your electricity supplier we may choose to contact you in relation to your account or in relation to your supply (E.g. Network upgrades planned outages or price changes relating to the government PSO level or other standing and per unit charges.
- As you electricity supplier we may contact you where there are periods with no top up activity or where consumption as measured (or estimated) by ESB Networks does not balance with your supply.
- For reasons highlighted in our Terms and Conditions and Code of Practice.
- for administration reasons related to the service to which you have signed up (e.g. to provide you with password reminders or to notify you that a particular service, activity or online content has been suspended for maintenance, or in response to a question that you ask us);
- to provide you with information about our services, activities or online content;
- to provide you with selected promotions and offers;
- to invite you to participate in surveys about our services (participation is always voluntary).

Where we wish to use your personal information in any other way, we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed in this document via an easy method of unsubscribing from future messages at no cost to you.

## **How we protect your personal information**

We do our utmost to protect user privacy through the appropriate use of the security technology: we ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures. The personally identifiable information we collect about you is stored in limited access servers. We maintain safeguards to protect the security, integrity and privacy of these servers and your personally identifiable information.

However, the Website and the Mobile App contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk. The Company recommends that you review the privacy statement and cookies policy at each website you visit to determine how that particular website protects your privacy.

## **Who we share data with**

We may disclose your personal information to any company or other corporate entity under the control and direction of the Company.

As stated above we may also use your data, or permit selected third parties to use your data, to provide you with information about services which may be of interest to you and we or they may contact you about these.

We reserve the right to access and disclose personal data to comply with applicable laws and lawful government requests, to operate our systems properly and to protect both ourselves and our users. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may also use service providers to help us run the Website, the Mobile App or to assist us to provide the services we provide to our customers. Any third parties who access your data in the course of providing services on our behalf are subject to strict contractual restrictions to ensure that your data is protected, in compliance with data protection legislation.

We may disclose your personal information in the event that we sell or buy any business or assets, in which case we may disclose your personal information to our professional advisers, the prospective seller or buyer of such business or assets or their professional advisers. If the Company or substantially all of our assets are acquired by a third party, your personal information held by us will be one of the transferred assets.

## **Notices & Contact Details**

### *How We May Contact You*

- 1.1 Notices required under this Contract, or other forms of communication that we need to send to you, will be in writing and may be delivered by hand, sent by post, sent by e-mail, published on our website, published in our mobile app and by a notice in a daily national newspaper.
- 1.2 Any notices that we send to you by hand or by post will be sent to the most recent billing address (or alternative address if relevant) provided by you to us. We will assume that you have received hand delivered notices within 24 hours of delivery and posted notices within 5 working days after posting unless we receive evidence to the contrary.
- 1.3 Any notices that we send to you by email will be sent to the most recent email address provided by you to us. We shall assume that you have received emails on the same working day unless we receive evidence to the contrary.

### *How You May Contact us*

- 1.4 If you need to contact us you can do so:
  - 1.4.1 via the postal address PrePayPower Limited, Paramount Court, Corrig Road, Sandyford, Dublin 18; or
  - 1.4.2 at the following telephone number; 1890 989 578 or
  - 1.4.3 by sending an email to the following email address [info@prepaypower.ie](mailto:info@prepaypower.ie).

## **USE OF PERSONAL INFORMATION**

- 1.1 All the information that you provide to us must be accurate and up-to-date. You must tell us about any changes to the information as soon as possible. You must provide us with your contact details, including your current email address and your current address and we are allowed to use these details to contact you in relation to your Contract with us. You must also provide us with your MPRN. If, pursuant to clause 2.1., you are deemed to have agreed to these

terms and conditions, it is particularly important that you provide us with up-to-date and accurate contact details as soon as possible, and keep us informed of any changes to your contact details.

- 1.2 Information you provide to us or that we hold about you may be used by us, our employees and/or our agents, including companies within our group for the purposes specified, including:
  - 1.2.1 to provide you with the services you have asked us for;
  - 1.2.2 to identify you when you call;
  - 1.2.3 to help detect and prevent crime, fraud or loss and to assist in debt recovery;
  - 1.2.4 to help with the administration of your account, services and products;
  - 1.2.5 as part of the process of selling all or part of our business; and/or
  - 1.2.6 with your consent, to contact you by post, phone (including by automated calling units), fax, e-mail, mobile app push notification, mobile app in-app message, and SMS with information about other services and products offered by us and/or our carefully selected partners.
- 1.3 We may also share your personal information with certain third parties who provide services in relation to this Contract in order to fulfil our obligations to you (including your Electricity Distributor for the purpose of maintaining and operating the supply to the Premises), or if we are requested to do so for legal or regulatory purposes. For example, we may be required to transfer your personal information to a supplier of last resort in the event of a direction from the Regulator to do so.
- 1.4 We may carry out credit and fraud prevention checks with licensed credit reference and fraud prevention agencies and they will retain a copy of the search. Information from your application and payment details on your account may be recorded by these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household and for debt collection and fraud prevention purposes.
- 1.5 We may also monitor or record telephone calls, to help improve our customer service, for security purposes, to administer your account and for debt recovery purposes.
- 1.6 Some other people or organisations that we share your information with may be based outside EEA, so your information may be transferred to countries that do not have the same standards or protection for personal information as Ireland. However, how we collect, store and use your personal information will continue to be governed by this clause 12, and in sharing your information with third parties based outside of the EEA, we will comply with our obligations under data protection law.
- 1.7 If someone has committed fraud or stolen electricity by tampering with the Meter or diverting the electricity supply, we will record these details on your account record and may share this information with third parties who are interested (such as regulatory bodies, other energy suppliers, landlords and housing associations). We may use this information to make decisions about you, your character, how likely we think you are able to pay for your electricity. This may include recording sensitive personal information such as criminal offences you have been convicted of.
- 1.8 You agree that we can ask your previous supplier for information that will allow us to take over your supply, any such information requests about Meter readings and Equipment or charges



you owe your previous supplier will be in line with industry procedures. You agree that we can provide information we hold about you (such as information about meter readings, Equipment or money you owe us) to your new supplier so they can begin supplying your electricity.

- 1.9 If you inform us that you (or a member of your household) need extra care (for example, because of your age, health, disability or financial circumstances), we may record this in the information we hold about you. We may share your information with:
  - 1.9.1 The Electricity Distributor, social services, charities, health-care and other support organisations, if we believe at any time that they may be able to help you, or the other members of your household, by making sure there is an electricity supply to the Address;
  - 1.9.2 other energy suppliers if we believe you are considering changing supplier; and
  - 1.9.3 the relevant metering agents or Electricity Distributor.
- 1.10 We will require direct permission from any individual (including yourself) to use their personal information as set out in this clause 12 and this Contract. This includes, in particular, sensitive information about yourself or other people in your household who will be regularly utilising energy under this Contract (such as health details for recording of vulnerable customer details). Individuals who have provided such direct permission agree that we can use this information in the way set out in this Contract.
- 1.11 You acknowledge that historical data relating to your consumption and use of electricity at the Premises is stored on the PPP Equipment and may be viewed by a third party that has access to the PPP Equipment.
- 1.12 You are entitled to have a copy of the information we hold on you, and to have any inaccurate information corrected. We may charge you a small fee for providing a copy of any information we hold about you. Please contact us at [DataAccess@prepaypower.ie](mailto:DataAccess@prepaypower.ie) for further information on your right of access to your personal information.

#### **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (the "EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Opt-Out**

- **Non customers**

You can exercise your right of opt-out to prevent such processing of your personal information by sending us such written request by prepaid post to:

Data Opt Out,  
PrePayPower Limited  
2<sup>nd</sup> Floor  
Paramount Court  
Corrig Road  
Sandyford  
Co. Dublin

- **Customers**

You may not opt out unless and until your contract with us has terminated, however you may request that your personal data not be used for marketing purposes by sending us such written request by prepaid post to:

Data Opt Out,  
PrePayPower Limited  
2<sup>nd</sup> Floor  
Paramount Court  
Corrig Road  
Sandyford  
Co. Dublin

## **Retention of Personal Data**

Any information that you provide will be kept and stored for such period of time that the Company deems appropriate taking into account all of our obligations under the DPA.

## **Updating Your Information**

It is your responsibility that all of the personal information provided to us is accurate and complete. If any information you have given us changes, please let us know either by writing to us at Data Control Manager, Prepaypower, 2nd Floor, Paramount Court, Corrig Road, Sandyford, Co. Dublin or by emailing us at [datacontroller@prepaypower.ie](mailto:datacontroller@prepaypower.ie) specifying your account/ MPRN on all correspondences.

## **Employment Application**

If you use the Website to make an application for employment with us, you acknowledge: (i) that the Company will not under any circumstances be liable to you should your application be unsuccessful or should your application not be received; (ii) that the technology utilised by the Company and its third party suppliers is designed to protect personally identifiable information but that the Company is unable to guarantee that all such personally identifiable information is not capable of being illegally accessed; (iii) that accordingly you assume all risk associated therewith and agree that the Company shall not under any circumstances be liable to you in respect thereof; (iv) that you provide any information solely at your risk and; (v) that any information provided will be kept and stored for such period of time the Company deems appropriate.

## **Payments**

The Company may collect financial information such as credit card information when a payment is made. We do not share this information with anyone outside the Company, other than other companies and individuals we employ to perform functions on our behalf such as sending mail and processing payments and this information will not be kept longer than necessary for providing the services. Any such company or individual will have access to personal information needed to perform these functions but may not use such personal information for any other purpose.

## **Changes to the Privacy Policy**

This Privacy Policy may be updated from time to time, so you may wish to check it each time you provide personal information to us. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use this Website to submit personal information or submit personal information to us in any other way. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on the Website. We will not use your personal information in a manner different from this Privacy Policy without your consent.

## **Consent**

- **Via the Website**

By accessing services offered by us or by providing information to us via our Website, you consent to the collection and use of this information as outlined in this Privacy Policy. By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Policy.

- **Via the Mobile App**

By accessing services offered by us or by providing information to us via our Mobile App, you consent to the collection and use of this information as outlined in this Privacy Policy. By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Policy.

- **Over the Phone**

By accessing services offered by us over the phone or by providing information over the phone, you consent to the collection and use of this information by us as outlined in this Privacy Policy. By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Policy.

- **By Any Other Means**

By accessing services offered by us by any other means, you consent to the collection and use of this information by us as outlined in this Privacy Policy. By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Policy.

## **Legal information and how to contact us**

The Data Controller for the Website and services provided by us is the Company.

You have the right under the DPA to access the information we hold about you. If you would like to obtain a copy of the personal information we hold on you, or have any queries regarding the Company's use of personal information please contact us by submitting a request to us in writing accompanied with a postal order for the applicable fee of €6.35 to Data Access Requests, PrePayPower Limited, 2nd Floor, Paramount Court, Corrig Road, Sandyford, Co. Dublin

We reserve the right to contact you at any time regarding any problems or questions as well as to notify you of changes to the Privacy Policy or to other policies or terms that affect you and your use of the Website or our services, but we are not obliged to do so.

If you have any questions about this Privacy Policy, the contents of this Website or our services, you can contact us at [dataqueries@prepaypower.ie](mailto:dataqueries@prepaypower.ie).