

PrepayPower Privacy Notice for Utility Customers

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Version Number	Changes Made	Date
Draft version 1.0	Policy Created	27/07/2017
2.0	Final Version	21/09/2017
2.1	Minor Updates	12/06/2019
2.2	Minor Updates; update to form	19/04/2019
2.3	Branding, PSD2 and Marketing update	25/07/2019
2.4	Minor updates	4/03/2020
2.5	Oil	10/03/2020

Acceptance of this Privacy Statement

This Privacy Statement located on the “website” www.prepaypower.ie and inside the “mobile app” “PrepayPower”. The website and the mobile app are both operated by Prepay Power Limited (registered number is 467144), a limited liability company incorporated in Ireland, whose registered office is at Paramount Court, Corrig Road, Sandyford Industrial Estate, Co. Dublin, D18 R9C7, and all of its direct and indirect subsidiaries (“we” or “our” or “the Company”). This Privacy Statement (together with our Terms & Conditions, Terms of Use and any other documents referred to in such Terms & Conditions or Terms of Use, (which can be located at the following location - <https://www.prepaypower.ie/termsandconditions>) 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. This Privacy Statement applies to all of our customers (Electricity, gas, oil and broadband), domestic and non-domestic. This Privacy Statement is incorporated by reference in the Terms & Conditions, but you will be required to expressly accept both this Privacy Statement and the Terms & Conditions before using our service (it will not be possible to accept one without also accepting the other).

In this Privacy Statement, the term “personal data” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes personal data as described in data protection legislation (as defined below). Please read the following carefully.

By providing us with your personal data, either through entering into the Website, the Mobile App and/or by any other means; by clicking an “I accept” or similar button on such platforms; by accepting in writing; or by verbally confirming over the phone or during the field sales process in person, you explicitly consent to the terms of this Privacy Statement, and indicate that you have either reviewed this Privacy Statement or have been given an opportunity to review this Privacy Statement and have agreed to be bound by it as well as our Terms & Conditions. For the avoidance of doubt, this includes your explicit consent in respect of any matter which is stated in this Privacy Statement to require explicit consent.

You confirm that you have the consent of each member of your household to agree to our use of data in accordance with our Privacy Statement.

We will keep a record of your consent in line with our data retention policy, in this regard (including a recording of any consent verbally given over the phone). 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 data we hold on you. Otherwise, you give us permission to use your personal data in accordance with this Privacy Statement. Please note that we may not be in a position to provide you with services if you have not consented to our use of your personal data as set out in this Privacy Statement unless we use your personal data for the performance of a contract with you (including any ‘deemed contract’ pursuant to the Terms & Conditions), or for our legitimate interests in accordance with Data Protection Legislation).

The data controller for the Website and Mobile App and services provided by us is the Company, and we may also process your personal data on the terms set out in this Privacy Statement.

Useful Words and Phrases

Please familiarise yourself with the following words and phrases as they have particular meanings in the Data Protection Laws and are used throughout this Privacy Statement

Personal Data	Means any information from which a living individual can be identified. This will include information such as telephone numbers, names, addresses, photographs, voice and video recordings, electricity, gas and oil consumption data. It will also cover information which on its own does not identify someone, but which would identify them if put together with other information which we have or are more than likely to have in the future.
Data Subject	User or person (customer) – the person whom the data is about
Special Categories of Personal Data (or Sensitive personal data)	Means any information relating to: <ul style="list-style-type: none"> - Racial or ethnic origin; - Political opinions; - Religious beliefs or beliefs of a similar nature; - Trade union membership; - Physical or mental health condition; - Sexual life; - Genetic data or biometric data for the purpose of uniquely identifying you; or - Offences or alleged offences or information relating to any offences committed or allegedly committed.
Data Controller	A person who controls the contents and use of the personal data. In terms of the relationship with our customers, Prepay Power acts as a Data Controller.
Data Processor	A person who processes personal data on behalf of a data controller
Data Processing	This covers virtually anything anyone can do with personal data, including: <ul style="list-style-type: none"> •Obtaining, recording, retrieving, consulting or holding it; •Organising, adapting or altering it; •Disclosing, disseminating or otherwise making it available; and •Aligning, blocking, erasing or destroying it.
Supervisory Authority	The Data Protection Commission in Ireland

What information do we collect about you and what do we use it for?

We will handle your personal data in accordance with Data Protection Legislation. “Data Protection Legislation” means the Data Protection Acts 1988 and 2003 and Directive 95/46/EC, any other applicable law or regulation relating to the processing of personal data and to privacy (including the E-Privacy Directive), as such legislation shall be amended, revised or replaced from time to time, including by operation of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) (and laws implementing or supplementing the GDPR).

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, and how we will use your information.

We need to use your personal data in accordance with this Privacy Statement in order to carry out our business as a utilities and Broadband supplier and to manage our account with you, including energy monitoring via our smart pay meter or oil sensor referred to below. You may be re-contacted as part of the sales process or the customer retention process, as required, and by providing your consent to this Privacy Statement, you consent to this.

We only collect and use individual user details where we have your consent to do so, or it is necessary for the performance of a contract between us and you, or it is necessary for our legitimate interests and where we are legally entitled to do so under Data Protection Legislation. Where you have provided your consent to our collection and use of your personal data, you are entitled to withdraw such consent by notice to us (see ‘How to contact us’ below).

All the personal data that you provide to us must be accurate and up-to-date. You must tell us about any changes to such information as soon as possible. You must provide us with your contact details, including your current email address and your current postal 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/GPRN. 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. Further information in relation to personal data collected by Irish entities is available on www.dataprotection.ie, the website of the Irish Data Protection Commissioner (“DPC”).

Examples of information we collect from our customers:

- Name
- Address
- Customer Account Number
- MPRN (Meter Point Reference Number)
- GPRN (Gas Point Reference Number)
- Date of Birth
- Phone number

- Secondary phone number if applicable
- Email address
- Bank account and credit/debit card details
- How much and at what times energy and oil is used at that property
- The type of meter/sensor installed at the property

We will also collect personal information about you in the course of supplying energy or other services to you. This will include information you provide when you communicate with us (via our website, app, over the phone, via email or in person), information we collect from the meter/sensor located at the property to which we are supplying energy or other services, and information we collect at the time of taking a payment from you.

We may also collect personal information when you complete a customer survey.

We ask you to provide us with the information described above so that we can:

- Provide the energy supply or other services; and
- Provide you with information in accordance with the “Marketing” section below

What rights do you have?

As a data subject, you have the following rights under the Data Protection Legislation:

- The right of access to personal data relating to you;
- The right to correct any mistakes in your personal data;
- The right to ask us to stop contacting you with direct marketing;
- Rights in relation to automated decision taking;
- The right to restrict or prevent your personal data being processed;
- The right to have your personal data ported to another data controller (e.g. if you decide to contract with a different supplier)
- The right to erasure; and
- The right to complain to the DPC if you believe we have not handled your personal data in accordance with the Data Protection Legislation

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact us (see 'How to contact us' below). We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond). Where

a response is required from us within a particular time period pursuant to Data Protection Legislation, we will respond within that time period.

a) Right to access to personal data relating to you

You may ask to see what personal data we hold about you and be provided with the following information:

- The purposes of the processing;
- The categories of personal data concerned;
- The recipients or categories of recipient to whom the personal data has been or will be disclosed, with a special focus on recipients outside of the EEA;
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- The existence of the right to request from the controller rectification or erasure (if applicable) of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- The right to lodge a complaint with the supervisory authority;
- Where the personal data is not collected from the data subject, any available information as to their source;
- The existence of automated decision making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- A copy of such personal data and the categories of data held (Only if this action will not adversely affect the rights and freedoms of others);

Requests for your personal data must be made to us (sar@prepaypower.ie) specifying what personal data you need access to, and a copy will be retained on your personnel file. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.

We are entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to Data Protection Legislation. If we decide to refuse to comply with the data access request, we will send you an email or a letter setting out why and advising you that you may complain to the Data Protection Commissioner.

Upon receiving a Subject Access Request, we may call you to confirm you have sent a mail to request this information. This is simply to confirm your identity. Similarly, if you make a subject access request over the phone, we will ask you to send an email also. This is a security measure to avoid the disclosure of data to an unauthorised third party.

b) Right to update your personal data or correct any mistakes in your personal data

You can require us to correct any mistakes in your personal data (including any of your identification documents) which we hold free of charge. If you would like to do this, please:

- Email, call or write to us (see “How to Contact Us” in section 20):
- Let us have enough information to identify you (e.g. account number, user name, registration details); and
- Let us know the information that is incorrect and what it should be replaced with

If we are required to update your personal data, we will inform recipients to whom that personal data have been disclosed, unless this proves impossible or has a disproportionate effort.

It is your responsibility that all of the personal data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible either by writing to us at Data Control Manager, PrepayPower, 2nd Floor, Paramount Court, Corrig Road, Sandyford, Dublin 18, D18 R9C7 or by emailing us at datacontroller@prepaypower.ie specifying your account/ MPRN on all correspondences.

c) The right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- Email, call or write to us (see “How to Contact Us” in section 20). You can also click on the “unsubscribe” button at the bottom of the email newsletter. It may take up to 5 days for this to take place;
- Let us have proof of your identity and address (a copy of your driving license or passport and a recent utility or credit card bill); and
- Let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (e.g. you may be happy for us to contact you by email but not by telephone.

We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have ‘unsubscribed’.

d) Rights in relation to automated decision taking

You may ask us to ensure that, if we are evaluating you (for example when doing a credit check on you), we don't base any decisions solely on an automated process and have any decision reviewed by a member of staff.

Profiling may occur in relation to your personal data for the purposes of targeted advertising and de-targeting you from specified advertising. This allows us to tailor our advertising to the appropriate customers and helps to minimise the risk of you receiving unwanted advertising.

These rights will not apply in all circumstances, for example where the decision is (i) authorised or required by law, (ii) necessary for the performance of a contract between you and us, or (ii) is based on your explicit consent. In all cases, we will endeavour that steps have been taken to safeguard your interests.

e) Right to restrict or prevent processing of personal data

In accordance with the Data Protection Legislation, you may request that we stop processing your personal data temporarily if:

- You do not think that your data is accurate (but we will start processing again once we have checked and confirmed that it is accurate);
- The processing is unlawful, but you do not want us to erase your data;
- We no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
- You have objected to processing because you believe that your interests should override our legitimate interests

If you exercise your right to restrict us from processing your personal data, we will continue to process the data if:

- You consent to such processing;
- The processing is necessary for the exercise or defence of legal claims;
- The processing is necessary for the protection of the rights of other individuals or legal persons; or
- The processing is necessary for public interest reasons

f) Right to Data Portability

In accordance with Data Protection Legislation, you may ask for an electronic copy of your personal data provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to personal data that you have provided to us – it does not extend to data generated by us.

The right to data portability also only applies where:

- The processing is based on your consent or for the performance of a contract; and

- The processing is carried out by automated means

g) Right to erasure

In accordance with Data Protection Legislation, you can ask us to erase your personal data where:

- you do not believe that we need your personal data in order to process it for the purposes set out in this Privacy Statement;
- if you had given us consent to process your personal data, you withdraw that consent and we cannot otherwise legally process your personal data;
- you object to our processing and we do not have any legitimate interests that mean we can continue to process your personal data; or
- your data has been processed unlawfully or have not been erased when it should have been;
- the personal data has to be erased to comply with law.

We may continue to process your personal data in certain circumstances in accordance with Data Protection Legislation.

Where you have requested the erasure of your personal data, we will inform recipients to whom that personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.

Data will not be erased when retention of the data is necessary for any of the below:

1. For exercising the right of freedom of expression and information;
2. For compliance with a legal obligation which requires processing by Union or Member State Law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
3. For establishment, exercise or defence of legal claims.

As there is a 6-year limitation period to take a breach of contract claim (statute of limitations), we will typically retain customer data for up to 7 years following the closure of a customer account in order to account for any delay to the commencement of the limitation period.

h) Right to complain to the DPC

If you do not think that we have processed your data in accordance with this Privacy Statement, please contact us in the first instance at datacontroller@prepaypower.ie. If you are not satisfied, you can complain to the Data Protection Commissioner or exercise any of your other rights pursuant to Data Protection Legislation. Information about how to do this is available on his website at <https://www.dataprotection.ie>

How do we collect information from you?

- IP Addresses

We collect IP addresses in line with our cookies policy 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 or over the phone) 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 or Mobile App users are visiting, how many times and how long they spend there.

- Cookies

We collate information with your consent on all our Website and Mobile App traffic that is represented in aggregate format through cookies. It is important to note that a cookie will not provide us with personal data, therefore if you have not supplied us with any personal data you can still browse the Website and/or use the Mobile App anonymously. By using the Website, the Mobile App and / or accepting our Privacy Statement, you are agreeing to the placement of cookies on your device unless you specifically choose not to receive cookies. See our [Terms of Use and Cookies Policy](#) for a detailed explanation of how we use cookies and how we use any third parties cookies.

- Registration Process

To register as a customer or if you wish to enquire about our services we need to collect information via our Website, our Mobile App or over the phone or any other form of communication such as, at a minimum, your name, email address and a password. You will be asked to give your consent to our use of your personal data during this registration process. 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 that we give you. (You can update your personal data held and change your stated interests. You may unsubscribe from receiving updates by emailing optout@prepaypower.ie – or by the opt-out options set out in the Marketing section (section 21) of this Privacy Policy). 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. To register on the Mobile App, you will need to follow the Mobile App Download Process set out on the Website. 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.

Monitoring and recording communications

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention, compliance, and obtaining your consent to this Privacy Statement and the Terms & Conditions.

How do we use the information we collect?

We use third-party tools, including but not limited to Google AdWords Customer Match and Facebook custom audiences to help exclude our existing customers from seeing our ads, and to reach similar web users who could also be interested in joining Prepay Power:

- To identify you when you call;
- for activities relating to the provision of prepaid electricity gas, broadband or oil services. This includes activities such as the administration of your account, meter or sensor installation, switching of your electricity or gas supply and monitoring top ups and electricity, Gas and oil consumption for revenue assurance and fraud prevention purposes;
- to personalise the way our content is presented to you (including advertisements) and to ensure that content from our Website and Mobile App is presented in the most effective manner for you and for your computer/phone and to provide the services or carry out the transaction you have requested;
- to help us to monitor and improve the services we offer, including the Website, the Mobile App and 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);
- to process, validate and verify requests for our utilities and other services and for the purposes for which you specifically provided the information;
- where you are an existing customer of ours for electricity services, to market and provide information to you in respect of our energy services as a similar product and 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;
- to verify with third parties (such as councils or property owners) that appropriate permissions have been obtained in relation to the transfer of electricity, gas or oil supply and installation of a meter and/or sensor;
- to carry out any legal obligations arising from your interaction with the Website and/or Mobile App and the provision of our utility and other services to you;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to help detect and prevent crime, fraud or loss and to assist in debt recovery;
- to accept a transfer of debt from your old energy supplier, or transfer a debt you owe us to your new energy supplier;
- to facilitate the delivery of oil
- to facilitate the installation of Broadband
- to facilitate the change of supplier process at the beginning and the end of your energy supply contract;



- to conduct research, statistical analysis and behavioural analysis; and
- to carry out customer profiling and analyse your purchasing preferences.

We wish to remind you that this Privacy Statement applies to personal data that we collect/process through your use of the Website and Mobile App. It does not apply to any links to third-parties' websites and/or services, such as third-party applications, that you may encounter when you use the Website and Mobile App. You acknowledge that the service that we provide may enable or assist you to access the website content of, correspond with, and purchase products and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your personal data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via the Website and Mobile App. We encourage you to carefully familiarize yourself with terms of use and privacy statements applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any such third-parties. By using the Website and Mobile App, you accept the privacy practices described in this Privacy Statement.

The personal 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 personal data by the Company for the purposes set out above.

Are there cases where we may use your personal data to contact you?

We may contact you:

- as your utility and broadband supplier we may choose to contact you in relation to your account or in relation to your supply (e.g. Network upgrades, planned outages, oil refills or price changes relating to the government PSO levy or other standing and per unit charges);
- as your utility and broadband supplier we may contact you where there are periods with no top up activity or where consumption as measured (or estimated) by ESB Networks or GNI does not balance with your supply;
- for reasons highlighted in our Terms and Conditions and Code of Practice;
- for administration reasons related to the utility and broadband 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; and
- to invite you to participate in surveys about our services (participation is always voluntary).

Where we wish to use your personal data in any other way not set out in this Privacy Statement, 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 data for purposes other than those listed in this Privacy Statement via an easy method of unsubscribing from future messages at no cost to you.

How we protect your personal data?

The security of personal data is important to us. We restrict access to personal data to employees, contractors and agents who need to know such personal data in order to operate, develop or improve the services that we provide.

We do our utmost to protect user privacy through the appropriate use of the security technology: we ensure that we have appropriate physical, technological and organisational security measures to protect your information and we ensure that when we outsource any processes that the service provider has appropriate security measures in place, and we have contracts in place with such service providers to ensure that this is the case. We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your personal data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

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.

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 or through our Mobile App and any such 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. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that the Website and Mobile App may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of your personal data arising from such risks.

Breach Reporting

We will notify data breaches to the DPC without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will provide a reasoned justification for the delay; however, it is not necessary to notify the DPC where the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A personal data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including its effects and the remedial action taken, and will notify you of any data breach affecting your personal data (which poses a high risk to you) when

we are required to do so under Data Protection Legislation. We will not be required to notify you of a data breach where:

- we have implemented appropriate technical and organisational measures that render the personal data unintelligible to anyone not authorised to access it, such as encryption; or
- we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- it would involve disproportionate effort, in which case we may make a public communication instead.

Who we share personal data with?

The recipients or categories of recipients of your personal data include, but are not limited to, electricity meter and/or oil sensor installers, electricity meter manufacturers, DSOs, ESB Networks, Gas Networks Ireland, Capita Customer solutions, Oil delivery Partners, Broadband providers, Marketing Partners, debt collection agencies (where required), and any other third-party data processors which we require to process your personal data for the purposes for which it was collected as set out in this Privacy Statement. We may disclose your personal data to any company or other corporate entity under the control and direction of the Company. Where personal data is disclosed or transferred to organizations who handle or obtain personal data as service providers, we require such organizations to agree by way of contract to the confidentiality of such personal data, undertake to respect any individual's right to privacy and comply with Data Protection Legislation and use such personal data only for our specified purposes and otherwise follow our reasonable directions with respect to such personal data.

As stated above, we may also use your personal data, or permit selected third-parties to use your personal 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 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.

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 end users/customers. 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 or the Mobile App or to assist us to provide our services 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 all applicable Data Protection Legislation.

In the event that we sell or buy any business or assets, we may disclose your personal data on a confidential basis 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 its assets are acquired by a third party, your personal data held by us will be part of the transferred assets.

Priority Services Register

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:

- the electricity or gas 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 you provide to us;
- other energy suppliers if we believe you are considering changing supplier; and
- the relevant metering agents or electricity or gas distributor.

For the avoidance of doubt, your consent to the terms of this Privacy Statement constitutes your explicit consent to our use of your personal data as set out in this section. This includes, in particular, sensitive information about yourself or other people in your household who will be regularly utilising energy under this Privacy Statement (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 Privacy Statement.

Half-hourly energy supply data

If there is a ESN smart meter, a PPP smart pay meter or PPP oil sensor at the property to which we are supplying energy under your energy supply contract, we will collect readings from it on a half hourly basis and retain and use such data for energy monitoring.

Where a ESN smart meter, a PPP smart pay meter or PPP oil sensor is installed at your premises, you consent to us managing your energy account remotely in accordance with this Privacy Statement. This includes remotely reading the meter and/or sensor, storing the read data obtained, remotely monitoring the energy supply, and remotely cutting off the supply (where we are entitled to do so under our contract with you, our supply licence or legislation).

Half hourly data gathering for the ESN smart meter, a PPP smart pay meter or PPP oil sensor is used for but not limited to the following: facilitating consumption screen data on the Mobile App, current balance screens, auto top-up facility and balance alerts.

For the avoidance of doubt, your consent to the terms of this Privacy Statement constitutes your explicit consent to our use of your personal data as set out in this section. If you do not consent to us collecting half hourly data in this way, we will be unable to facilitate you with this type of meter install.

Where we store your personal data?

The personal 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 personal data is treated securely and in accordance with this Privacy Statement. The safeguards in

place with regard to the transfer of your personal data outside of the EEA are the entry by us into appropriate contracts with all transferees of such personal data.

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 or Mobile App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Your personal data may be transferred to the distribution system operator for the purpose of maintaining and operating supply to the premises. Your personal data may also be transferred to the "Supplier of Last Resort" in the event of a direction from the CRU, in respect of any requirements which apply to customers in relation to safety or network related activity.

Marketing

We would like to send you information by post, email, telephone, text message (SMS), web chat, app notifications, app chat or automated call about promotions, competitions and special offers which may be of interest to you. Other businesses which we have selected carefully (i.e. marketing or advertising agencies) may also send you similar marketing messages, depending on what you agree with us. You can opt out of these direct marketing communications at any time, either directly through the same communication or by contacting us (see 'How to contact us' below). You may also notify us that that you only wish to receive direct marketing materials via one or more of the following mediums: SMS, email, via phone, via the Mobile App or by letter. We will ask whether you would like us and other businesses to send you direct marketing messages when you sign up to our service.

Prepay Power may also use reviews that you post in forums such as Trustpilot, in other promotional material and media for our advertising and promotional purposes.

Retention of Personal Data

Any information provided to us will be kept and stored for such period of time as is set out in our retention policy taking into account the purpose for which it was collected and our obligations under Data Protection Legislation.

Employment Application

If you use the Website or Mobile App (if applicable) 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 such information solely at your risk and; (v) that any such information provided will be kept and stored for such period of time the Company deems appropriate taking into account its obligations under all applicable Data Protection Legislation.

Online 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 for longer than necessary for providing the services. Any such third-party service providers will be subject to contractual provisions which safeguard the security of your personal data. Any such company or individual will have access to personal data needed to perform these functions but may not use such personal data for any other purpose. GPUK LLP T/A Global Payments are the company used to process payments. GPUK LLP are regulated by the Financial Conduct Authority (504290) for the provision of payment services. Their credit card storage environment is maintaining to PCI DSS V3.2.1 level 1 compliance. In order to comply with the revised Payment Service Directive (PSD2), there will be a requirement for us to send Global Payments more of your personal data, in order for them to be able to successfully process your payments. The additional personal data we will be transferring to them includes (but is not limited to) – email address, phone number, billing address, and shipping address. Global Payments may share this data with Visa or Mastercard, who will in turn share this data with your own bank.

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 Statement. By providing any personal data to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Statement.

- 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 Statement. By providing any personal data to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Statement.

- 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 Statement. By providing any personal data to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Statement.

- In Person

By attending our registered offices in person you consent to the collection and use of CCTV footage obtained by way cameras located in the reception area and elsewhere in the building, installed for the protection and security of our customers, staff, property and for health and safety concerns. This footage is deleted after 30 days

- 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 data to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy Statement.

Changes to the Privacy Statement

This Privacy Policy may be updated from time to time, so you may wish to check it each time you provide personal data to us. The date of the most recent revisions will appear on the first page of this Privacy Statement. If you do not agree to these changes, please do not continue to use the Website or Mobile App to submit personal data or submit personal data to us in any other way. We will not use your personal data in a manner different from this Privacy Statement without your consent.

Legal Information and How to Contact Us

How we may contact you

- 1) Notices required under this Privacy Statement, 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 email, published on our website, published on our Mobile App and/or my notice in a daily national newspaper.
- 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.
- 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 to contact us

- 1) Our postal address is Prepay Power Ltd., Paramount Court, Corrig Road, Sandyford, Dublin 18, D18 R9C7; or
- 2) Our telephone number is 1890 989 578; or
- 3) Our email address for matters relating to this Privacy Policy:
datacontroller@prepaypower.ie

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, the Mobile App 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, our Mobile App or our services, you can contact us at datacontroller@prepaypower.ie.