Privacy Policy Utility Aid Limited

**CONTENTS**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**CLAUSE**

[1.](#_heading=h.1ksv4uv) Important information and who we are 1

[2.](#_heading=h.ihv636) The data we collect about you 3

[3.](#_heading=h.2grqrue) How is your personal data collected? 4

[4.](#_heading=h.3tbugp1) How we use your personal data 5

[5.](#_heading=h.1664s55) Disclosures of your personal data 8

[6.](#_heading=h.34g0dwd) International transfers 9

[7.](#_heading=h.43ky6rz) Data security 10

[8.](#_heading=h.1x0gk37) Data retention 10

[9.](#_heading=h.39kk8xu) Your legal rights 10

[10.](#_heading=h.40ew0vw) Glossary 12

**Introduction**

Welcome to the privacy policy for Utility Aid Limited.

Utility Aid Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and when we receive your personal data in other ways such as from you directly or third parties. This privacy policy will tell you about your privacy rights and how the law protects you. Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

**1. *IMPORTANT INFORMATION AND WHO WE ARE***

**2. *THE DATA WE COLLECT ABOUT YOU***

**3. *HOW IS YOUR PERSONAL DATA COLLECTED?***

**4. *HOW WE USE YOUR PERSONAL DATA***

**5. *DISCLOSURES OF YOUR PERSONAL DATA***

**6. *INTERNATIONAL TRANSFERS***

**7. *DATA SECURITY***

**8. *DATA RETENTION***

**9. *YOUR LEGAL RIGHTS***

**10. *GLOSSARY***

1. **Important information and who we are**

**Purpose of this privacy policy**

This privacy policy aims to give you information on how Utility Aid Limited collects and processes your personal data through your use of our website, including any data you may provide through our website, when you ask us to get in touch with you in relation to our services and when we use your services as a supplier. This privacy policy will also give you information on how Utility Aid Limited processes your personal data when you or a third party provides it to us through other means such as email or post.

Our website is not intended for children, and we do not knowingly collect data relating to children through our website or otherwise.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

**Controller**

Utility Aid Limited is the controller and responsible for your personal data (collectively referred to as "Utility Aid", "we", "us" or "our" in this privacy policy).

Melissa Payne is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, please contact her using the details set out below.

**Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our Melissa Payne in the following ways:

Email address: [*mpayne@utility-aid.co.uk*](mailto:mpayne@utility-aid.co.uk)

Postal address: 3 Mill House, Carre Street, Sleaford, NG34 7TW.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

[*Utility Aid Complaints Handling Statement*](https://www.utility-aid.co.uk/customer-care)

**Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. We will update you as to any changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

1. **The data we collect about you**

The majority of our business is conducted with other companies; however, as a representative of that business you will still provide us with your personal data. We also deal with sole traders and partnerships and these individuals will also provide us with personal data to enable us to provide our services.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* **Identity Data** includes first name, last name, marital status, title, and gender.
* **Contact Data** includes address, email address and telephone numbers.
* **Financial Data** includes bank account and payment card details.
* **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
* **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
* **Usage Data** includes information about how you use our website and services.
* **Marketing and Communications Data** includes preferences in receiving marketing from Utility Aid, Third parties and your communications preferences.

Through our website, we may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you (for example, to provide the services you have requested), and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case we may not be able to perform the services, but we will notify you if this is the case at the time.

1. **How is your personal data collected?**

We use different methods to collect data from and about you including through:

* **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, through our website or otherwise. This includes personal data you provide when you ask about our service, contact us or ask us to contact you.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

* **Third parties or publicly available sources.** We will receive personal data about you from various third parties and

Technical Data from the following parties:

* + 1. analytics providers

* + 1. advertising networks

* + 1. search information providers (Contact, Financial, & Transactional from payment service).
* Identity and Contact Data from our Partnerships, Data Brokers, Aggregators and from publicly available sources such as Companies House and the Electoral Register.

1. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal obligation.
* Performance of a contract with you

Please see the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [*Contacting Us*](https://www.utility-aid.co.uk/contact).

**Purposes for which we will use your personal data**

Utility Aid Limited is a utility broker for business. We provide competitive contract pricing and assist our customers in the set up and throughout their utility supply. To enable us to provide you with the right product or service to meet your needs we will collect personal data from you.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| --- | --- | --- |
| To register you as a new client | (A) Identity  (B) Contact | (A) Performance of a contract with you  (B) Necessary for our legitimate interests |
| To provide the services including:(A) Manage payments, fees, and charges (B) Collect and recover money owed to us | (A) Identity  (B) Contact  (C) Financial  (D) Transaction  (E) Marketing & Communications | (A) Performance of a contract with you  (B) Necessary for our legitimate interests (For example to recover debts due to us) |
| To manage our relationship with you which will include:  (A) Notifying you about changes to our terms or Privacy Policy  (B) Asking you to leave a review or responding to an enquiry | (A) Identity  (B) Contact  (C) Marketing & Communications | (A) Performance of a contract with you  (B) Necessary to comply with a legal obligation  (C) Necessary for our legitimate interests (to keep our records updated and to analyse how clients use our services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (A) Identity  (B) Contact  (C) Financial  (D) Transaction  (E) Technical  (F) Usage  (G) Marketing & Communications | (A) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (B) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (A) Identity  (B) Contact  (C) Usage (D) Marketing & Communications  (E) Technical | Necessary for our legitimate interests (to analyse how clients use our services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, services, marketing, client relationships and experiences | (A) Identity  (B) Contact  (C) Financial  (D) Transaction (E) Technical  (F) Usage  (G) Marketing & Communications | Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about services that may be of interest to you | (A) Identity  (B) Contact  (C) Financial  (D) Transaction (E) Technical | Necessary for our legitimate interests (to develop our services and grow our business) |

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical and Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or are using our services. We will offer you the opportunity to opt out of receiving marketing.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside Utility Aid for marketing purposes.

**Opting out**

You can ask us or third parties to stop sending you marketing messages by [*Contacting Us*](https://www.utility-aid.co.uk/contact) at any time. Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the services you have purchased, or any other transaction with us.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie policy.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. **Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

* External Third Parties as set out in the *Glossary*.
* Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. **International transfers**

Some of our external third parties are based outside the European Economic Area (EEA) so we may be required to transfer your personal data outside the EEA from time to time.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded and that appropriate safeguards are in place.

1. **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If you require further information in relation to our security, please contact Melissa Payne.

1. **Data retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Usually, we will not retain your data for longer than six years after you cease being customers.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

1. **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

* *Request access to your personal data*.
* *Request correction of your personal data*.
* *Request erasure of your personal data*.
* *Object to processing of your personal data*.
* *Request restriction of processing your personal data*.
* *Request transfer of your personal data*.
* *Right to withdraw consent*.

If you wish to exercise any of the rights set out above, please contact Melissa Payne.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1. **Glossary**

**LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**THIRD PARTIES**

**External Third Parties**

* Energy Suppliers
* Service providers acting as processors who provide IT and system administration services
* Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and Account Services.
* HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in United Kingdom who require reporting of processing activities in certain circumstances.

**YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful, but you do not want us to erase it.
* Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
* You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Utility Aid Ltd Cookie Policy**

**Last updated: [24.07.2023]**

Welcome to Utility Aid Ltd, this cookie policy aims to explain how we use cookies, similar technologies, and the choices you have regarding their use when you visit our website. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

**What are cookies?**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

**How we use cookies-**

We use cookies for the following purposes:

• **Analytical or performance cookies-** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We use Google analytics to analyse traffic on the website. We use Google analytics to analyse traffic on the website.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

| **Cookie Title**  **Cookie Name** | **Purpose** | **More information** |
| --- | --- | --- |
| Visitor\_id\*session  Analytical Cookie | The functionality is: to store a unique user ID. The purpose is: Marketing/Tracking  The visitor cookie includes a unique visitor ID and the unique identifier for your account. For example, the cookie name visitor\_id12345 stores the visitor ID 1010101010. The account identifier, 12345, makes sure that the visitor is tracked on the correct Pardot account. The visitor value is the visitor\_id in your Pardot account. This cookie is set for visitors by the Pardot tracking code.  The functionality is: to manage a unique session. The purpose is: Marketing/Tracking  A session cookie named pardot is set in your browser while you’re logged in as a user or when a visitor accesses a form, landing page, or page with Pardot tracking code. The cookie denotes an active session and isn’t used for tracking. | <https://help.salesforce.com/articleView?id=pardot_basics_cookies.htm>        <https://help.salesforce.com/articleView?id=pardot_basics_cookies.htm> |

**Third-Party Cookies**

We may also use cookies provided by third-party service providers, such as analytics tools, advertising networks, and social media platforms. These cookies are subject to the respective third parties' privacy policies.

Please note that the following third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

1. Google analytics

2. Cloudfare.com

3. Twitter analytics

4. Facebook analytics

5. LinkedIn

To deactivate the use of third-party advertising cookies, you may visit the consumer page to manage the use of these types of cookies.

**Managing Cookies**

You have the option to manage or disable cookies on your device. Most web browsers allow you to control cookies through their settings. However, please be aware that disabling certain cookies may affect the functionality of our website.

**Cookie Consent**

When you visit our website for the first time, we will request your consent to use non-essential cookies. By continuing to use our website after seeing the cookie banner, you are consenting to the use of cookies as described in this policy.

**Changes to Our Cookie Policy**

We may update this cookie policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will post any changes on this page with an updated revision date.

**Contact Us**

If you have any questions or concerns about our cookie policy or how we use cookies on our website, please contact us at [customercare@utility-aid.co.uk](mailto:customercare@utility-aid.co.uk)

**Please note- all cookies will expire annually.**