

SK UTILITIES LTD

PRIVACY POLICY

ABOUT THIS POLICY

We, Smart Utility Management (“**the Company**”), are committed to protecting your personal data. This privacy policy explains how we handle the personal data which we hold including the personal data which we collect when you use this website at www.smartutilitymanagement.co.uk or otherwise when we collect personal data from you in other ways such as via letters of authority, email, over the phone or otherwise where you contact us.

It also explains your privacy rights and how the law protects you including how we comply with the General Data Protection Regulation (“**GDPR**”) and other related legislation which relates to the use of personal data.

Additional information may be provided on particular pages of this website for example, on any specific pages where we collect personal data and you should also refer to those. We also operate cookies on our website and information about that is also provided separately in our [Cookies Policy](#).

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how the Company collects and processes your personal data through your use of this website, including when you make an enquiry or when you otherwise get in touch, or complete a letter of authority.

It is important that you read this privacy policy together with any other statements or fair processing notices we may provide on specific occasions when we collect or process personal data so that you are fully aware of how and why we are using your data.

DATA CONTROLLER

Smart Utility Management is the data controller and is responsible for the use of your personal data. Our full details are set out below.

CONTACTING US

If you have any questions about this privacy policy including any requests to exercise your data privacy rights, please contact:

HR Manager

Address: Smart Utility Management, Dunns 3, Bowes Offices, Lambton Park, Chester Le Street, DH3 4AN

Email: customercare@smartutilitymanagement.co.uk

Tel: 0191 300 8544

You have the right to make a complaint to the Information Commissioner’s Office (**ICO**) which is the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.

YOUR OBLIGATIONS

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.

If you provide us with information about any other person, for example any other individuals within your organisation or your business partners, then you must ensure that you have their consent to pass those details to us and for us to use those details in accordance with this privacy policy. You should also make sure that you bring this privacy policy to their attention.

THIRD-PARTY LINKS

This website may include links to third-party websites. Clicking on those links 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 policies. You should read any policies and other statements on such websites carefully.

DATA WE COLLECT ABOUT YOU AND HOW WE WILL USE IT

Personal data means any information about an individual from which that person can be identified. It does not include data which has been anonymised such that a person’s identity is removed.

The following table explains the types of personal data which we may collect, use, store and transfer. We will only use your personal data as the law allows us to. The categories of personal data which we use include:

- **Career Data:** including your CV, career history information and references.
- **Financial Data** such as bank account or card payment details when you place an order with us, credit history information, and details of trade referees.
- **Identity and Contact Data** such as names, titles, and other identifiers together with business address, email address and telephone numbers.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. This may also include information about how you use our website and our goods and services.

The table below also explains the purposes for which we use different categories of personal data and the legal basis or bases which we believe applies to those uses. We may process your personal data for more than one lawful basis depending on the purpose for which we are using your data.

Purpose	Types of personal data used	Lawful basis for processing
To open and administer the account which the organisation you represent has with us to provide our services to you, including, for example, to contact you or deal with the provision of our services as well as for our internal record keeping.	Identity and Contact Data Financial Data	This will be necessary for the performance of the contract that will be in place between us. This use of data is also in our legitimate interest in ensuring that the services we provide are managed, such as to

<p>Where the organisation you represent is one of our suppliers/contractors, to correspond with you about goods and services we have ordered from you and to make necessary arrangements with you, as well as to carry out any audits required.</p>		<p>ensure compliance when providing energy suppliers with your data.</p>
<p>To manage the relationship which we have with the organisation you represent as a customer, contractor or supplier, such as dealing with any enquiries or complaints.</p>	<p>Identity and Contact Data</p>	<p>This will be necessary for the performance of the contract that will be in place between us.</p> <p>This use of data is also in our legitimate interest in ensuring that the goods and services we provide are managed, such as to ensure goods and services are fit for purpose and provided in accordance with our business requirements.</p>
<p>To administer this website, including troubleshooting, data analysis, testing, system maintenance and support.</p>	<p>Identity and Contact Data Technical Data</p>	<p>This will be necessary for our legitimate interests in providing and improving our website and customer service to you, to improving the goods and services we offer and in ensuring our website operates properly and for network security.</p>
<p>To ensure our third-party providers can perform their obligations to us.</p>	<p>Identity and Contact Data Technical Data Financial Data</p>	<p>This will be necessary for our legitimate interest in ensuring that our third-party providers, such as insurers, external contractors, such as IT providers and marketing consultants, are able to provide those services.</p>
<p>To deal with new enquiries and contacts.</p>	<p>Identity and Contact Data Financial Data Career Data</p>	<p>This will be necessary for our legitimate interests in the operation of our business in order to be able to respond to and deal with new enquiries, for example, to assess your application if you apply for one of our job vacancies via the vacancies page on our website.</p>

In addition, we may disclose information about you to the extent that we are required to do so by law, regarding any legal proceedings or prospective legal proceedings, in order to establish,

exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk) and / or where we may otherwise do so in accordance with applicable data protection legislation.

HOW IS YOUR PERSONAL DATA COLLECTED?

Most of the personal data which we hold is collected directly by way of letter of authority, through the website, by email, over the phone or during meetings and will be directly from you or in some cases might be provided by your colleagues. For example, you might provide certain identity information by completing our letter of authority via DocuSign.

Some of the technical data which we collect may be collected automatically as you interact with our website for example via the use of cookies and similar technologies.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, under the terms of a contract we have with the organisation you represent or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require or otherwise properly deal with your request.

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 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 also 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.

If you would like further information about how we use personal data and the purpose which we might use it for, please contact us.

DISCLOSURES OF YOUR PERSONAL DATA

We will transfer the personal data contained in the letter of authority to third parties, exclusively energy suppliers.

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 who have a business need to know it. 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.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

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 requirements.

In some circumstances, we may anonymise personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them. You have the right to:

- **Request access** to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data: 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.** You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.
- **Object to processing** of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. You can also object to direct marketing. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data’s accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

EXERCISING YOUR RIGHTS

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

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 personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests in which case we will keep you updated.