

PRIVACY NOTICE

PS Energy UK Limited T/A Wasps Energy

THE DATA PROTECTION ACT 1998 (THE ACT) PLACES SPECIFIC OBLIGATIONS ON US IN THE WAY WE HANDLE YOUR PERSONAL INFORMATION.

ABOUT THIS NOTICE

This Notice governs the collection, storage and use of personal information about individuals collected by PS Energy UK Limited trading as 'Wasps Energy'. (**"we", "us" or "our" for short**).

This Notice was Last Updated : **16 February 2018**.

The content of this Notice may change from time to time. Please check the content of the Notice regularly to keep informed of any updates.

Please ensure you read this Notice carefully.

If you do not agree to use using your personal information as set out in this Notice then you should not use this website.

This Notice only covers Wasps Energy.

PS Energy UK Limited, trading as Wasps Energy is a wholly owned subsidiary of Npower Limited and is part of the Npower Group of Companies. As the official holders of the gas and electricity supply licences both Npower Limited and Npower Gas Limited will have access to the personal information collected by us.

Just so you know other than us, our Group Companies, including Npower Limited, who may have access to your personal information under this Notice include:

Npower Commercial Gas Limited	Plus Shipping Services Limited
Npower Financial Services Limited	Superior Plumbing Installations Limited
Npower Gas Limited	Octopus Electrical Limited
Npower Northern Limited	Scarcroft Investments Limited
Npower Yorkshire Limited	Homepower Retail Limited
Npower Yorkshire Supply Limited	Npower Direct Limited

THE AIM OF THIS NOTICE

The aim of this Notice is to let you know :-

1. When we collect personal information from you,
2. How we collect personal information from you,
3. How we store and use the personal information we collect,
4. How we may share your information.
5. How you can find out what personal information we hold about you.

WHEN WE COLLECT PERSONAL INFORMATION FROM YOU?

1. When you purchase products and services from us,
2. When you use our online customer portal website; and
3. When you use our mobile app.

HOW WE COLLECT PERSONAL INFORMATION

1. From You
2. From You via our mobile App.
3. From You via our secure site
4. From Third Parties

FROM YOU

We collect personal information directly from you (such as your name, address etc.) as requested by our signup process online or over the phone and contact forms together with any comments or remarks that you may provide in free text fields or may send to us.

We may also collect information about your property's characteristics (for example its age, number of bedrooms) for energy efficiency advice and occupier details (for example the number of people living in the property) for things like assessing vulnerability and providing you appropriate services.

We also obtain personal information from you when you interact with us whether in writing, e-mailed, or as a result of visits, interviews or recorded telephone calls, live chats, filling out the 'contact us' forms on our website or mobile app, posts on our social media sites or feedback given via our mobile apps.

FROM YOU VIA OUR MOBILE APP

If you are a customer and choose to use our Mobile App and the functionality

(services) it provides (such as updating meter readings, viewing invoices and transactions, paying energy bills, seeing your energy usage and contacting Wasps Energy we will collect information about you and your use of our Mobile App to help us understand how you are using them, track and administer them and diagnose problems.

The information about your mobile device includes the model and brand, the operating system version, the screen resolution, the date and time on it, video graphics card and memory available, the internet protocol address, and the email address you send any crash reports from. We also collect your customer and consumer number and Wasps Energy account customer name. We use Google Analytics tools in our mobile applications (see below for more information about Google Analytics).

FROM YOU VIA OUR SECURE SITE

Like most websites, our secure website www.waspsenergy.co.uk uses “cookies” - small text files that are saved to your computer. More details about cookies, how we use them and how you can disable them can be found at www.waspsenergy.co.uk/cookie-policy.

We use services such as Google Analytics and Google Experiments to collect information about our websites and mobile applications and help us analyse them, better configure our service and messages, track the performance of referring websites, administer our websites and monitor your interactions with our websites. These services collect a range of anonymised information, such as the number of visitors on our sites per day, which pages they visit, some content they enter, see and interact with when they visit and use our sites, their computer’s internet protocol address and operating system, the date and time of their visit, browser type and language, referring website addresses, and the types of devices using our websites and mobile applications. They also infer or collect demographic profiles about our website users, (e.g. age and gender) which are inferred through a range of techniques including cookies from websites you visit and in the case of Google Analytics from other Google services. See below for a description of the types of cookies we use.

When Google Analytics or Google Experiments receives aggregated anonymised personal information, that information is transferred, processed and stored on Google servers around the world by Google in accordance with Google’s privacy notice available at <http://www.google.com/privacy.html>.

FROM THIRD PARTIES

We will also collect information from third parties and industry sources who are

involved in your electricity supply (such as your distributor, meter equipment owners and meter readers).

We may also keep a record of references and information received from third parties (for example from agents you authorise to carry out your switch to npower, credit reference or fraud prevention agencies). In particular we receive information about your energy use as described below.

We will (unless it's impractical) tell you, if we obtain and store information from any other source (other than from another electricity industry participant in accordance with standard industry practises) and also how we intend to use it in accordance with this Notice.

You must let us know if your information for example your phone number or email address changes so that we can keep this information up to date.

FROM YOU ABOUT OTHER PEOPLE

If you provide information on behalf of anyone else then in doing so you are confirming that you have explained how their information may be used by us and they have given you permission for us to do so. If you have provided any sensitive information about yourself or others (such as health related information) you agree (and are confirming that any other person whom the information is about, also agreed) that we can use the information as set out in this Notice.

HOW DO WE STORE AND USE YOUR PERSONAL INFORMATION?

We (or others acting on our behalf) will only use the information you give us, or which we legally receive from another organisation or person (for example, our agents), to set up and manage your gas or electricity account (or both) with us.

We will share relevant information with relevant gas and electricity industry participants based on agreed industry processes. We may use it:

- to help us identify you so we know who we are talking to;
- to supply you with the services you have asked us for;
- to set up and otherwise manage your account, including loyalty and incentive programmes, including conducting credit checks or otherwise assessing your credit worthiness, collecting payments, recovering debts, analysing your account history and improving our service to you which will include sending you:
 - » notifications via our mobile app;
 - » service messages such as meter read and payment reminders, changes to our opening hours by mobile app notifications, text and/or email;
 - » account notifications and communications such as price and other terms

- and conditions changes by mobile app notifications, text and/or email;
- » emails relating to loyalty rewards, customer promotions and competitions run by Wasps Energy, as well as other services offered , if you opted to receive direct marketing. You will not be able to opt out of receiving service messages relating to matters like payment and your monthly account review.
 - to measure your energy use and to work out your bills;
 - to help prevent and detect debt, theft, fraud or loss of gas or electricity (or both);
 - assess health and safety, environmental and financial risks to you;
 - to arrange for other Npower Group Companies to provide services to you where we do not offer them, and to meet legal or regulatory obligations - for example, if you need or want a prepayment meter, are on a green deal, need energy efficiency advice, or you are not a domestic customer;
 - to train our staff and monitor our services. This will involve us recording our conversations with you or keeping copies of our correspondence with you to make sure we are providing you with a good service and are meeting our legal and regulatory obligations; and
 - for general business purposes, such as paying our affiliate referral partners such as broker websites like uswitch, carrying out internal reporting, profiling, modelling and analysis, market research, producing statistics, diagnosing problems, testing systems to help improve the way we provide our services and the products.

HOW WE MAY SHARE YOUR PERSONAL INFORMATION

We may share your information with:

1. Our agents and service providers
2. Credit reference agencies
3. The industry Theft and Fraud prevention agency, only if Theft or Fraud is suspected.

OUR AGENTS AND SERVICE PROVIDERS

We may pass information about you to our agents and service providers for the purposes set out in this Notice for the following purposes:

- Agents acting on our behalf to provide the services you have asked for or to

carry out profiling, modelling and analysis, market research, statistical analysis and the testing of our systems to help improve the way we provide our services and the products that we are able to make available to you.

- Relevant gas and electricity industry organisations and agencies, based on agreed industry processes.
- Credit-reference and fraud-prevention agencies (see 'How we may share your personal information with credit-reference agencies' below for more details). We may use this information to help us assess your ability to pay our bills and to make decisions about the products and services that we offer you.
- If we suspect someone has committed fraud or stolen energy by tampering with the meter or diverting supply we'll record those details on your account and may share that information with Ofgem and other interested people such as other energy suppliers, landlords and housing associations (see 'Theft and Fraud Prevention' below for more details).
- Relevant law enforcement agencies or government agencies where we have been asked to provide the information for legal or regulatory reasons for example by a lawyer or Ofgem (if we receive a legitimate request for the information).
- If you do not pay a debt, we may ask a debt recovery agent to pursue that debt on our behalf or we may transfer your debt to another organisation and give them details about you and that debt or we may use a credit reference agency or fraud prevention agency to trace you if you have not provided your contact details or a forwarding address so that we can recover your debt or we may pass your details on as part of current or future legal action. We may also tell your future service provider of any debt you may have with us.
- For regulatory purposes to Ofgem (or any organisation which takes over Ofgem's role) or directly to an agent acting on their behalf, or as part of a government data-sharing initiative for example ones aimed at helping people who cannot afford to pay for their heating and electricity. They may pass that information to other agencies to be analysed or for other purposes relevant to their request or investigation.
- to comply with any applicable laws and lawful government requests.
- If an organisation takes over all (or nearly all) of our business or assets, we may pass your personal information to them with appropriate contractual and security safeguards and we

This may involve passing your information outside of the European Economic Area (EEA) to countries that do not have the same data protection standards as we do in the UK. If we, or our agents and service providers, do this, we will make sure that it happens with the relevant legal and security protection in place.

CREDIT REFERENCE AGENCIES

We will search the files of credit-reference agencies, and gather information from fraud-prevention agencies and use information we already hold about you for internal credit risk and debt management purposes and to help us assess your ability to pay our bills and to make decisions about the payment arrangements that are most suitable for you and the products and services that we can offer you. We may also use the information to verify your identity and to assist in the prevention of crime. Set out below is a brief guide to how we and the credit reference agencies and fraud prevention agencies will use your information.

We will check your details with one or more credit reference agencies. We may also use information that we already hold about you in relation to your account.

You must ensure that if you are providing information about other people that they agree to us having their information for the purposes you are providing it. If you give us false or inaccurate information and/or we suspect or identify fraud or theft of energy we will record this and may also pass this information to fraud prevention agencies and other organisations (such as the police) involved in crime and fraud prevention who may also use this information.

When credit reference agencies receive a search from us, for example, when you apply to take supply from us or when you move home, they will place a search footprint on your credit file that may be seen by other organisations.

We may share information on your accounts that we hold or open for you and how you manage it/them to credit reference agencies and where relevant with fraud prevention agencies. We may access and use information from such agencies to check any applications you make for credit, to check your identity, to recover debt. If you owe us money and when requested, do not repay in full and on time, credit reference agencies will record the outstanding debt. If we consider that your account is in default (i.e. you have not paid us and are in breach of your agreement with us) we will notify you and if you do not pay us we will report the unpaid debt to credit reference agencies who will record that default on your credit file. If you set up an instalment plan or some form of payment arrangement with us then a payment arrangement flag may be recorded on your file. We may record such a flag irrespective of whether or not you are a current customer with us or a previous customer whose account was closed with an outstanding debt that remains to be paid by you.

The information we share may be supplied to other organisations (such as banks, other utility companies, companies who offer you credit to purchase goods and services) by credit reference agencies and fraud prevention agencies to perform similar checks to those set out in d) above and to trace your whereabouts if you have moved without providing a forwarding address so that they (and we) can

recover debts that you owe. The credit reference agencies keep records for 6 years after your account has been closed, you have paid the debt or action has been taken against you to recover the debt.

We and other organisations may access and use, from other countries, information recorded by fraud prevention agencies.

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.

If you would like more information, you can find a full version of how your data will be used and shared with credit reference and fraud prevention agencies at www.waspsenergy.co.uk/privacy-policy or you can call us on 0800 048 0514 (generally free from most landlines and should be free from a mobile) and we will email you further details.

If you would like to see what information a credit reference agency or fraud prevention agency holds about you, you can contact those currently operating in the UK. The information they hold may not be the same so it is worth contacting them all. They will charge a small statutory fee.

CallCredit, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0330 0247574 or log onto www.callcredit.co.uk

Equifax PLC, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0800 014 2955 or 0333 321 4043 or log on to <http://www.equifax.co.uk>

Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0344 481 0800 or 0800 013 88 88 or log on to <http://www.experian.co.uk>.

THEFT AND FRAUD PREVENTION

If we suspect that someone has committed fraud or stolen energy by tampering with the meter or interfering with the supply we will record this information on your account and we may share this information (for as long as you have an account with us) on a regular basis (including occupier details, property type and consumption data), with the industry appointed TRAS Fraud Prevention Agency (including their sub-contractors (if any)) who will use that information and that of other customers (whether or not supplied by us) to check public and other databases they hold or have access to so that they can profile geographical, behavioural and other similar trends for the purpose of theft and fraud risk assessment and to generate leads based on that analysis which they will pass on to us for the purpose of preventing and detecting the theft of energy and the prosecution of offenders ("theft leads").

The **TRAS Fraud Prevention Agency** will hold this information and may provide it to other energy suppliers (where you have an energy account with them) or to Ofgem and other industry bodies in accordance with agreed industry processes and the information may continue to be used even following termination of this agreement where you are supplied by a different supplier.

We may use any information we have collected as well as any theft leads received from third parties including the TRAS Fraud Prevention Agency to (where relevant and appropriate) detect, investigate, pursue (including prosecute) and prevent (in so far as possible) theft and fraud.

If we suspect or confirm that you have committed energy theft a record of this will be kept by us and the TRAS Fraud Prevention Agency and this may include recording sensitive personal information such as alleged criminal offences you have been accused of. We may use this information to assist us in making decisions about your payment arrangements and the products and services we offer you in the future.

HOW YOU CAN FIND OUT WHAT PERSONAL INFORMATION WE HOLD ABOUT YOU?

Just ask us! You are entitled to see the personal information that we hold about you at any time. (If you write to, email or phone us and ask to see this information, it is known as a 'subject access request' or 'SAR' for short). You can do so by:

- telephoning us on **0800 048 0514** (free from most landlines) ;
- Contacting us using the 'Contact us' forms on our website www.waspsenergy.co.uk/contact-us or our mobile app; or
- writing to us at Data Protection Officer, **Wasps Energy, Level 9 Quayside Tower, 252- 260 Broad Street, Birmingham B1 2HF.**

When we receive your request we will send you a form to fill in, and we may also request you identify yourself. If you do not return the form, we will not be able to deal with your request.

Even if you don't want a copy of your personal information, you can still contact us to check that the personal information that we hold is accurate, or to let us know of any changes to your personal information. We always try to ensure that the information that we hold is accurate, up to date and relevant. We'll be more than happy to make changes or to correct any inaccuracies.

WHO IS YOUR DATA CONTROLLER?

PS Energy UK Limited trading as Wasps Energy is the data controller for your information. You can contact us to exercise any of your rights by:

- telephoning us on **0800 048 0514** (free from most landlines) ;
- Contacting us using the 'Contact us' forms on our website at www.waspsenergy.co.uk our mobile app; or
- writing to us at Data Protection Officer, **Wasps Energy, Level 9 Quayside Tower, 252- 260 Broad Street, Birmingham B1 2HF.**

DATA RETENTION

After you cease to be a customer we will still use your personal information for our general business purposes such as in aggregated consumption data), to call you if you switch away to finalise your account and get your feedback, and if you owe us money we will still use your personal information to recover money from you or if we want to list any payment defaults with a credit agency.

PRIORITY SERVICES REGISTER

If you elect to go on our Priority Services Register or PSR, we may use your information to enable us to consider what additional help and support we can provide you, if you consent to us storing this information.

You or a member of your household may need this extra help as a result of your (or their) health, age, disability or financial circumstances or it could be because you are vulnerable for another reason (we assess and record who may require extra help as a result of their circumstances).

If you don't consent to us storing this information about you, we will not be able to provide services that are tailored to meet any needs you have.

If you consent to us sharing this information we will also pass it on to relevant industry bodies like electricity distributors, gas transporters, any sub-contractors like metering companies that provide field services for us and other trusted charities such as the British Red Cross (as applicable), to enable:

- the electricity distributor and gas transporters, so they can tailor their services to help you,
- trusted charities who may assist during incident situations to support us in safeguarding you;
- us to commission our contractors like metering companies to provide extra help and services to you.

If you don't consent to us sharing the information, we will not be able to provide services that are tailored to you or meet your needs. For example we cannot tell your distributor, so you will not get advanced warning of supply interruptions.

Any details supplied to us as part of the PSR will never be used for any other purposes such as marketing.

- You need to let us know if anything changes so we can ensure we provide the most appropriate support for you. If you no longer want to be part of the PSR just let us know. However, if you do this, we will not be able to provide services that are tailored to you or meet your needs. More information is available at www.waspsenergy.co.uk/priority-services-register.

SECURITY

We take security seriously, and we comply with the law to take adequate technical and organisation measures to keep your personal information secure. If you are a Wasps Energy customer, you are responsible for keeping your email address and password secure.

Your user name and password should only be used in connection with the supply of energy to your property or properties. You should not tell anyone else your password or user name, and if you do, you are responsible for what they do with it.

When you use your debit card or credit card during signup or on our online web portal, the debit card or credit card information is transmitted using Secure Socket Layer (SSL) protocol, this encrypts your information.

Wasps Energy keeps only some of your debit card or credit card details. However your full credit card and debit card details will be encrypted and securely stored by our online payment providers (currently Mastercard and Lloyds).

Make sure you always logout when you have finished using the Wasps Energy customer website, especially if you access Wasps Energy from a shared computer.

IF YOU HAVE CONSENTED TO US SENDING YOU MARKETING MATERIAL...

If you have consented to us sending you marketing material you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes by calling our call centre on 0800 048 0514 or by unsubscribing from the emails using the link in them.

EXTERNAL LINKS FROM OUR SITE

From time to time we may include hypertext links to sites which are created by individuals and companies outside of Wasps Energy or PS Energy. We do this

when there is a particular relevance to the topic you're reading about. Whilst we endeavour to check that the content of these sites is suitable, we unfortunately cannot take any responsibility for the practices of the companies who publish the sites that we link to, nor the integrity of the content contained within them.

WHAT IF WE UPDATE THIS NOTICE OR YOU HAVE ANY QUESTIONS?

We do keep our privacy notices under regular review but we will email our customers regarding any changes. You'll be notified of any changes by email as soon as they happen.

- If you have any questions or if you feel that we are not complying with the terms of this Notice please do contact us through using the 'Contact Us' forms on our website or our mobile app, calling our call centre on **0800 048 0514** or emailing privacy@waspsenergy.co.uk.

Phone calls: Calling us on a 0800 number is normally free when you call from a landline but charges may vary if you use a mobile.