



## **Privacy and Cookies Policy**

Your privacy is important to us. This privacy policy explains what personal data we collect from you and why, as well as how we use it and keep it secure. If you have any questions about this privacy policy, or if you wish to exercise your rights you can contact our Data Privacy Manager by email at [data@sustainablebusinessservices.co.uk](mailto:data@sustainablebusinessservices.co.uk) or writing to Data Privacy Manager, Sustainable Business Services, 38 Gillas Lane, Houghton Le Spring DH5 8EE

### **Who are we?**

We are Sustainable Business Services Ltd, (Company Number 13014827). We are a business providing expert utilities buying and management solutions Our registered office is 38 Gillas Lane, Houghton Le Spring DH5 8EE. In this Policy, Sustainable Business Services Ltd is referred to as “we”, “us” and “our”. This Policy is our privacy and cookies policy in relation to the personal data we collect from visitors to our website, <https://www.sustainablebusinessservices.co.uk/> (the “Website”) and those who use our services.

We respect each person’s privacy and are committed to protecting personal data. This Policy sets out how we look after the personal data we collect from those who visit the Website or procure our services, and it outlines a person’s privacy rights and how the law protects them.

We may update this Policy from time to time. If we do, we will post a new version on the Website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to the Policy by email if you have asked us to keep in touch with you by email.

### **What this Privacy Policy covers**

At Sustainable Business Services, we take your privacy very seriously and are committed to putting our customers first by being transparent on how we collect, use and protect personal information.

Sustainable Business Services Ltd is a data controller, according to the applicable data protection laws, means a person who determines the purposes for which and the manner in which any personal data is to be processed. Sustainable Business Services Ltd is the data controller for any personal data provided to us through the Website and/or for the provision of our services



We want you to be confident that your personal information is safe and secure. Except as provided for in this Privacy Policy, we will not share your personal information with third parties for any other purpose, unless we are permitted to do so by law.

This privacy policy explains:

- what personal information we collect about you.
- the source of your personal information.
- what we use your personal data for.
- purposes for which we will use your personal data.
- how and when you can withdraw your consent.
- when personal information may be transferred outside the UK or EEA.
- marketing-related information.
- how we share information with third parties.
- what you should do if your personal information changes.
- whether you need to provide your personal information to us.
- if any monitoring is involved in processing your personal information.
- about other automated decision making.
- how long your personal information is retained by us.
- your rights under data protection laws.
- your right to object.
- your marketing preferences and what they mean; and how to contact us.

We may make changes to this policy from time to time, for example to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will notify our customers of changes by prominently posting a notice on our website ([www.sustainablebusinessservices.co.uk](http://www.sustainablebusinessservices.co.uk)). We encourage you to regularly check back and review this policy, so that you will always know what information we collect, how we use it and who we share it with.

**What information do we collect?**



Personal information we will process about you may vary based on what service we provide to you. Typically, we need details such as:

- Name
- Company / Organisation Name
- Company Position
- Email Address
- Telephone Number(s)
- Trading Status / Business Ownership
- Business Size Information
- Business Sector
- Business Activity
- Energy usage data
- Your interaction with Sustainable Business Services i.e. your query, conversation and any outcome
- Details of your visits to our site and the resources that you access.

When visiting our website, you may also be providing us with certain information via our use of website cookies, such as your IP address. Our website contains links to other websites. Please note that when you follow one of these links, these websites have their own privacy policies and we do not accept any responsibility or liability for their content, or any personal data provided to them.

We also monitor email communications and may restrict delivery under certain circumstances.

We comply with the data minimisation principles of data protection laws, and we will not collect any personal data that we do not need to be able to provide services to you.

**What is the source of your personal information?**



We collect personal information from the following sources:

- Information you give to us or that is generated about you when you use our products or services, for example information that allows us to contact you or bill you for our services.
- Other sources such as Fraud Prevention Agencies, HM Revenue and Customs (HMRC), Credit Risk agencies and other organisations to assist in prevention and detection of crime, police and law enforcement agencies or as part of our debt collection process.
- From other trading parties in the water retailer, energy suppliers, aggregators of these services plus partner businesses

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

The table below explains the ways in which we process all personal data that we collect, and the legal bases we rely on to do so. Where necessary, we have also identified our legitimate interests.

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 would like more details about the specific legal ground on which we are relying 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 manage our relationship with you which will include: (a) Notifying you about changes to this Policy. (b) Providing you with information when you ask for it. (c) Contacting you when you have asked us to contact you	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary to comply with a legal obligation. (b) Performance of a contract with you (c) Necessary for our legitimate interests (to keep our records updated, and direct marketing).

To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical (d) Usage	(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 use data analytics to improve the Website, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep the Website updated and relevant, to develop our business and to inform our marketing strategy).
To communicate marketing and sales messages to you relating to our services and products.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).
To process and deliver our services to you including: (a) Manage payments, fees and charges. (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).

#### **Is personal information transferred outside the UK or the European Economic Area?**

We are based in the UK, but sometimes your personal information may be transferred outside the EEA to our contracted suppliers who work on our behalf. This may include sensitive information for the purposes of providing the service requested by you. If it is necessary to transfer your personal information outside of the EEA, we will only do so where:

- the European Commission has decided that the country or organisation we are sharing your information with will protect your information adequately;
- the transfer has been authorised by the relevant data protection authority; and/or



- we have ensured that suitable safeguards are in place, for example we have entered into a contract with the organisation with which we are sharing your information.

### **Marketing**

From time-to-time, we may tell you about products and services that we think may be of interest to you, for example services that help improve efficiency in your business or could lower your utility costs. These might come from ourselves or carefully selected third parties. Each time you are contacted with such information, you are given the opportunity not to receive any more. You may ask us at any time to stop sending you these communications.

Please let us know via our website by completing a general enquiry form on our website, or by writing to us at the address set out in the "Contact Us" section at the end of this privacy policy. If you receive a marketing email from us, you will always have the option to remove your consent by using the unsubscribe option. Please note though, you may still receive non-personalised information about us or our services through your letterbox.

### **Promotional offers from us**

We may use the Identity, Contact, Technical, Usage, Profile, and Marketing and Communications Data from Website visitors and customers to form a view on what they may want or need, or what may be of interest to them. This is how we decide which products, services and offers may be relevant; we call this marketing.

Website visitors and customers will receive marketing communications from us if they have requested information from us or purchased services from us and, in each case, they have not opted out of receiving that marketing.

### **What are marketing preferences and what do they mean?**

We may use your supply or business address, phone numbers and email addresses to contact you according to your marketing preferences. You can stop our marketing communications at any time by using the "Contact Us" information at the end of this document.

### **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, where this is required or permitted by law.

### **Third-party marketing**

We will get your express opt-in consent before we share any personal data with a third party for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us 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 contracts we have in place with you, or other transactions.

### **Cookies**

The Website uses cookies. Cookies are tiny text files which identify your computer to our server as a unique user when you visit certain pages on the Website and they are stored by your Internet browser on your computer's hard drive. Cookies can be used to recognise your Internet Protocol address, saving you time while you are on the Website.

We only use cookies for your convenience in using the Website and not for obtaining or using any other information about you (for example targeted advertising). Your browser can be set to not accept cookies, but this would restrict your use of the Website.

If you want to find out more information about cookies, go to <http://www.allaboutcookies.org> or to find out about removing them from your browser, go to <http://www.allaboutcookies.org/manage-cookies/index.html>.

Please note that we collect data from the Website about use of the Website using a web analysis tool which uses cookies that are (able to be) used to generate pseudonyms for a user's profile. This means that use cookies (which may be stored on your computer after you leave the Website) can store information about your visit.

The Website uses the following cookies: - **to add here**



## Disclosures of your personal data

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

- Internal Third Parties as set out below.
- External Third Parties as set out below.
- 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 Policy.
- The Information Commissioner's Office or another regulator or relevant body (such as the Police) when we are asked or required to do so.

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.

## 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, consultants, 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.

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





## How long we use your personal data for

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.

By law we have to keep basic information about our customers and suppliers for six years after they cease being customers or suppliers (as appropriate). For other personal data, details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your 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 notice to you.

**Your legal rights** Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

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

**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 may 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 may 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.

### **Your right to make a complaint to the ICO**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.

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



## THIRD PARTIES

**Internal Third Parties** Other companies in our corporate group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

### External Third Parties

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