

SSE Airtricity Privacy Notice



At SSE, we're committed to ensuring your privacy is protected. This privacy notice applies to the SSE Airtricity Retail business, which is operated by the following data controllers (all of which are members of the SSE Group):

- **SSE Airtricity Limited** operating under the trading name SSE Airtricity;
- **SSE Airtricity Energy Supply (NI) Limited** and **SSE Airtricity Gas Supply (NI) Limited**; and
- **SSE Airtricity Energy Services Limited** and **SSE Airtricity Energy Services (NI) Limited** our dedicated Boiler and Home Services Division.

When we refer to "SSE", "we", "us", and "our", we mean any of those data controllers, as appropriate. By "you" or "your" we mean any individual, sole trader and/or partnership that receives services from us, uses our website or otherwise interacts with the SSE Airtricity Retail business.

Please read this notice carefully as it provides important information about how we handle your personal information and the steps you can take to control it.

If you have any questions, comments or concerns about any aspect of this notice, please contact us using the details set out in section 11.

This privacy notice is divided into the following sections:

1. **What information do we collect and how do we do it?**
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1. **What information do we collect and how do we do it?**

We, or third parties on our behalf, collect your personal information when you use our website, communicate with us by phone, letter, email, social media or in person, receive our products and/or services, or request to join schemes which you are eligible for.

We may collect the following personal information and we refer to this as "**personal information**" throughout this notice:

- your name;
- billing address;
- supply address;
- telephone numbers;
- e-mail addresses;
- date of birth;
- details of a secondary contact (e.g. name, phone number & billing address);
- energy usage (e.g. meter readings and units of gas and electricity used over a period): if you are a Smart customer, we may receive from ESB Networks, interval (usage every 30 minutes) or non-interval (Bi-monthly reads) depending on the tariff you choose;
- financial information (e.g. bank account details);
- credit history;
- personal requirements and lifestyle, including details of any vulnerabilities;
- permissions (e.g. we will record if you have consented to marketing);
- your preferences (e.g. if you would prefer paperless billing);
- if you are a home owner or renter;
- survey responses;
- CCTV footage when you visit our sites or offices;
- information about any other accounts you hold for gas and/or electricity, including the name of the supplier and payment methods;
- for electricity customers, your Meter Point Reference Number (MPRN) to identify your electricity supply;
- for gas customers, your Gas Point Reference Number (GPRN) for ROI and (SMPN) for NI, that identifies your gas supply;

- details necessary for an SEAI Grant in ROI and details necessary for an NISEP Grant in NI;
- if you visit our website or use our mobile app and consent to the use of cookies, we will collect and process information from cookies and similar technologies, including browser and device information, your approximate geolocation, your behaviour on our website or app, etc. More information about how we use cookies can be found in our cookies policies on the relevant website or app;
- if you engage with us through social media, we collect your name and store a link to your relevant social media profile, which we combine with details of your previous correspondence with us. When interacting with us through a social media platform your personal data may also be shared with the social media platform providers. We recommend that you review the privacy policy of social media providers when contacting SSE Airtricity through social media channels;
- if we, or third party suppliers, carry out a home visit, we may collect personal information about you or a member of your household from that visit. E.g. we may record information that has been supplied to us and obtained fairly about you or a member of your household who may benefit from Priority Services;
- if we suspect that someone has committed fraud or stolen energy, e.g. by tampering with a meter or diverting the energy supply, we will record that information; and/or
- if you register an account for services with us, we create and record customer ID numbers for you and record the date of your application. We need this personal information so we can provide services and/or products to you. If you don't provide us with that personal information you may not be able to access certain products and/or services.

2. How do we use your personal information?

2.1 We, or third parties e.g. call centres, on our behalf, collect, use and store the personal information collected about you to:

- (a) Provide, or obtain on your behalf, relevant products and/or services, benefits, and rewards;
- (b) Facilitate the payment of your energy bills;
- (c) Respond to any enquiries or issues you have;
- (d) Identify you;
- (e) Detect and prevent crime, fraud or loss;
- (f) Contact you, or authorised third parties, about our services and/or products, such as sending you information when you sign up or change tariffs, service announcements and administrative messages;
- (g) Train our staff and improve our products and services, which may mean that we monitor and record communications that we have with you including phone conversations, emails, SMSs and web or video chats;
- (h) Conduct, and contact you in relation to, market research e.g. through customer satisfaction surveys and questionnaires;
- (i) For the purposes of detection, prevent and reporting criminal or potentially criminal activity;
- (j) Obtain government funding for the supply of energy efficiency measures to individuals;
- (k) Identify offers and advice tailored to your needs or lifestyle;
- (l) Ensure the health and safety of our staff, visitors and members of the public;
- (m) Make decisions about the products and/or services and terms and conditions that we can offer to you e.g. if you ask for certain tariffs we will assess if anything prevents us from offering that tariff to you;
- (n) Make personal projections about the amount of energy you are likely to use in each period;
- (o) If you are a Smart customer, we will use your consumption information to provide insights on your actual usage;
- (p) Use information collected from your visit to our website for administrative purposes; for troubleshooting, data analysis, testing, research and statistical and survey purposes; to ensure content is presented in an effective manner; and to enable you to participate in interactive features;
- (q) Respond to or resolve any enquiries or requests that you may have from social media;
- (r) Enable internal corporate reporting, business administration, adequate insurance coverage, the security of company facilities, research and development, and to identify and implement business efficiencies;
- (s) Comply with any procedures, laws and regulations which apply to us – including where we reasonably consider it is in our (or others) legitimate interests to comply;
- (t) Establish, exercise or defend our legal rights – including where we reasonably consider it is in our (or others) legitimate interests; and
- (u) We may also use your date of birth to help identify you when you contact us, and to prompt inclusion on the relevant Priority Services or Special Services Register.
- (v) When you engage with the Airtricity Virtual Assistant (chatbot), you are engaging with a tool which utilises artificial intelligence and machine learning (AI) which is trained using publicly available data. It has not been trained using SSE personal data. The AI is used to interpret your enquiries and provide

you with a response. These can be either general questions or limited account information such as account balance or next bill date. Where you make an enquiry about your account, you will be asked to provide your account number and the last 4 digits of your phone number. A separate tool within the Virtual Assistant will be used to match these details with our customer database and provide you with a response. Your personal data will only be processed during your chat session and will not be used in any other way by the AI. However, you do not need to share your personal data with Airtricity Virtual Assistant to use the services for general enquiries.

2.2 Marketing Communications

With your consent, we may contact you in writing, by phone and via email or SMS with information on products, services and rewards that we, other companies within the SSE group, and occasionally our carefully selected partners, offer.

Our carefully selected partners are:

- Activ8
- Eddy Emerging control
- MyEnergi

We may use third parties to send marketing communications. Unless you have asked us not to, we may also use your email address to show you digital advertisements via your social media newsfeed, on search engine results pages, or on other websites.

Unless you have asked us not to, we may profile your data to provide you with marketing and offers that are relevant to you. If you opt out of profiling we will still run analysis that includes your data, but any decisions or marketing output that result from that analysis will not be used to market to you. You will be sent generic marketing that may not be relevant to you.

To opt out of receiving marketing messages, or to object to our use of profiling for direct marketing purposes, contact us at any time using the details in section 11.

2.3 What happens when you have more than one account with us?

If you have multiple accounts with us, we will use information from each of your accounts stored by the relevant data controllers (as listed above) to try to create a single view of you as a customer. We will use this information to send you service messages and information relating to your accounts. We will also use this information to enhance your experience with SSE in any communications with you about relevant offers, promotions, competitions and surveys, where you have consented.

3. How do we use your sensitive personal information?

We treat the information that we collect about your (or a member of your household's) requirements for your welfare (e.g. due to age, health, disability or financial circumstances) as being particularly sensitive. We will use this information in the following ways:

- (a) ensure your welfare and the welfare of other householders e.g. ensuring network operators do not stop your supply and can respond appropriately during a major incident or emergency. To do this, we will share this information with network operators;
- (b) provide products and/or services to you in the most appropriate way e.g. if you require large print or braille communications;
- (c) manage staff and third party contractors; and
- (d) provide you with the most appropriate customer experience where you attend an SSE event.

With your consent, we may also share this information with the following individuals or organisations:

- social services, charities, healthcare and other support organisations; and/or
- other relevant organisations, such as emergency responders or local authorities, which may be able to provide support.

4. What information do we receive from third party sources?

We also receive your personal information from the following third party sources:

- (a) **Other energy suppliers** – where you are joining SSE from another supplier, we may receive information relating to outstanding debt on your account in line with relevant market guidelines;
- (b) **Network Operators** - including meter readings and equipment and when you ask to switch your account to us. We may also receive details of suspected fraud or energy theft for the purposes of identifying and preventing fraud or crime;
- (c) **Credit reference or fraud prevention agencies** – More information can be found at 6(n) and 6(o)

- below;
- (d) **Debt Collection Agencies** – in relation to debt associated with your utility account;
 - (e) **Data providers** – we collect information from third party data providers, including aggregated geo-demographic and lifestyle data, and combine this with account information to conduct statistical analysis. These customer insights help us to plan our marketing activities and conduct market research and business development;
 - (f) **Councils, local authorities or housing associations** – we may receive your name, address and contact details where they would like carbon-saving measures applied to your property under relevant government funding schemes;
 - (g) **Letting agents, landlords, cohabitants or previous tenants** – if you have recently moved into a rental property that we supply energy to or if that third party introduces you to SSE, for the purposes of setting up your account;
 - (h) **CRU (Commission for Regulation of Utilities) in Republic of Ireland and UR (Utility Regulator) in Northern Ireland** – as a regulated entity, we may receive your personal information from our regulators, to satisfy our regulatory obligations;
 - (i) **Law enforcement agencies** (such as An An Garda Síochána and the PSNI) to identify and prevent fraud or crime;
 - (j) **SSE group companies** - for internal administrative purposes such as ensuring consistent delivery of our services to customers; and
 - (k) **Third party introducers** (such as price comparison websites) to set up an account for you and to provide the services that you have requested.

5. Legal Bases for Processing

We've assessed that the legal bases for using your personal information as set out in this notice are as follows:

- (a) **Contract** – our use of your personal information is necessary to perform our obligations under any contract we have with you; or
- (b) **Legal Obligations** – our use of your personal information is necessary for complying with our legal obligations;
and/or **Substantial public Interest** - Our use of your personal information is necessary as there is a substantial public interest in vulnerable individuals receiving additional customer support when receiving services. or;
- (c) **Our Legitimate Interests** – to:
 - (i) Run, grow and develop our business;
 - (ii) Detect and prevent fraud;
 - (iii) We may transfer information relating to your utility account to a debt collection agency in respect of unpaid/outstanding debt;
 - (iv) Enhance the security of our network and information systems;
 - (v) Ensure that our own processes, procedures and systems are as efficient as possible;
 - (vi) Better understand how people interact with our website;
 - (vii) Analyse and enhance the information that we collect;
 - (viii) Determine the effectiveness of our promotional campaigns and advertising; and
 - (ix) Enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers.

If you have concerns about the processing activities based on our legitimate interests, please see section 11.
- (d) **Consent** – We rely on your consent to use your personal information to send you marketing information by post, phone, mobile phone, email or SMS. If you later change your mind, you may withdraw your consent via electronic communications by clicking on the unsubscribe link and/or by contacting us using the details in section 11 and we will stop using your information in this way.

6. Who do we share your personal information with?

We will share your personal information with the following categories of third parties:

- (a) **our third-party suppliers, partners and sub-contractors** that provide, review and/or receive services in relation to our website, services and/or products, which include: payment processors; suppliers of technical, support and installation services; insurers; logistics providers; security providers; cloud services providers and via API integrators; research agencies; and if you are entitled to claim government funding for energy efficiency measures, installers, energy performance assessors and sales advisers.
- (b) **any company that is a member of the SSE group;**

- (c) where appropriate, **family members or cohabitants, previous tenants, landlords, or letting agents** who/which may require information about you or your premises, or who introduced you to SSE;
- (d) if we're under a duty to disclose your information to comply with any legal obligation, **government or law enforcement officials** as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (e) **other energy suppliers** if you choose to leave us, we'll share your information with the other suppliers to assist the switching process, including energy usage and any debts on the account. We may also share your personal information where they carry out services for us, e.g. if they carry out meter readings at your property for us;
- (f) **regulators or other legally appointed bodies** (such as CRU/UR) for legal or regulatory purposes, e.g. if requested we may send your information to CRU to prove that you qualify for relevant government funded schemes;
- (g) **companies or partner organisations** which provide services in relation to, or use information as part of, market research;
- (h) **third parties that help us with advertising and marketing.** For example, we share limited personal information with the following third parties who serve advertising on their platforms on our behalf: Amazon, Viant, Facebook and Google Adwords;
- (i) **relevant gas transporters, metering agents or network operators;**
- (j) **debt collection and tracing agents** if we provide you with services and you fail to make payments;
- (k) **authorised third parties or named account holders** on any account you hold with us;
- (l) if we sell, merge, or perform any internal re-organisations in relation to any of our (or any third party's) business or assets, the personal information will be one of the transferred assets to the **relevant buyer and/or new data controller** of such business or assets;
- (m) **any third party** where required to:
 - (i) enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; and
 - (ii) protect the rights, property or safety of SSE, our staff, customers or others.
- (n) **credit reference agencies**
 If you are a Home Energy customer based in Northern Ireland, where it is necessary to credit check you, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an on-going basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at www.experian.co.uk/crain/index.html. If you are a Business Energy customer (in Northern Ireland and/or the Republic of Ireland), where it is necessary to credit check your business, we will supply your business information to credit reference agencies (CRAs) and they will give us information about your business, such as about your business' financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about your business with CRAs on an on-going basis. CRAs may share this information with other organisations.
 The use of credit reference agencies is not in use for domestic Electricity/Gas (Home Energy) customers in the Republic of Ireland.
- (o) **fraud prevention agencies**
 - (i) To help us identify fraud and energy theft, we will give details of your account to fraud prevention agencies who will use the information to check public and other databases they hold and may provide information to us to help identify fraud and energy theft. Checks will be performed on a regular basis whilst you hold an account with us.
 - (ii) If we suspect or can confirm theft of energy has occurred, a record will be kept by fraud prevention agencies which may include sensitive information about alleged criminal offences. The fraud prevention agencies may provide the information to other energy companies to help identify fraud and detect energy theft but only in limited circumstances where you have accounts with them. Where theft has been identified, your account terms may change, but we will notify you separately if this is the case.

7. International Data Transfers – How is your personal information transferred outside of the EEA?

Your personal data may be transferred to or processed in a country which is outside your resident country (this includes outside of the United Kingdom and European Economic Area ("EEA")). This may include transfers to other companies within the SSE group, and to third parties.

We take organisational, contractual, and legal measures to ensure that adequate levels of protection have been implemented to safeguard your personal data such as:

- Where the country has been granted an adequacy decision by the European Commission and/or the Information Commissioner in the UK. This means that the destination country provides an adequate level of protection which is equivalent to that applied in the UK, and the EEA;
- Put in place a contract with the third party receiving the personal data, which incorporates the Standard Contractual Clauses (“SCCs”) which has been issued by the European Commission (in relation to transfers of European residents’ personal data) and the UK addendum to the SCCs which has been issued by the ICO (in relation to transfers of UK residents’ personal data), that means the third party who receives the personal data must protect it to the same standards set out in the GDPR;
- Where an appropriate derogation as set out in Article 49 of the GDPR applies; or
- Where the EU-US Data Privacy Framework and/or the UK Extension to the EU-US Data Privacy Framework arrangements apply.

8. How long do we hold your personal information?

8.1 We keep your personal information for no longer than is necessary of the purposes for which the personal information is processed. The length of time we retain it for depends on the purposes for which we use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

8.2 This means that some of your personal information will be kept for a short time e.g. we may keep copies of correspondence and complaints for up to three years following resolution. Other information may be kept for a longer period, e.g. we keep your contact details for a period of up to seven years after your account has settled (but for a shorter period if that is possible), and where you have participated in a marketing campaign your unconverted lead will be kept for 12 months.

9. How will we change this privacy notice?

We may update our privacy notice from time to time. Any changes we make to our privacy notice in the future will be posted on the SSE Airtricity website and, where appropriate, notified to you by post or email.

10. What choices and rights do you have in relation to your personal information?

10.1 You may contact us using the contact details provided in section 11 to request that we:

- confirm whether your personal information is being processed;
- provide you with further details about how we process your personal information;
- provide you with a copy of any personal information which we hold about you;
- where we rely on your consent as a legal basis to justify using your personal information, withdraw your consent to that use;
- consider any valid objection to the processing of your personal information (including the right to object to processing where we are relying on our legitimate interests as a legal basis for processing);
- ask us to update or delete personal data which we hold about you;
- restrict the way that we process your personal data;
- provide you with a copy of your data in a machine-readable format. Where technically feasible we will consider any valid request to transfer your personal data relating to an energy account to a third-party provider of services (data portability); and
- where we carry out automated decision-making that has legal or similarly significant effects on you, ensure that we manually review that decision, provide an explanation of that decision and/or consider your appeal of that decision.

10.2 We will consider all those requests. However, certain personal information may be exempt from those requests in certain circumstances, which may include needing to keep processing your personal information for our legitimate interests or to comply with a legal obligation.

10.3 If an exemption applies, we will tell you this when responding to your request. We may ask you to provide us with information necessary to confirm your identity before responding.

11. **How can you contact us?**

11.1 If you would like to contact us in relation to your rights or if you are unhappy with how we've handled your information, you may contact us by sending a letter:

Republic of Ireland

Data Protection Specialist
SSE Airtricity, Red Oak South,
South County Business Park,
Leopardstown,
Dublin 18,
D18 W688

Northern Ireland:

Data Protection Specialist
SSE Airtricity,
25 Great Victoria Street,
Belfast
BT2 7AQ

or sending an email to irelanddataprotection@sse.com

11.2 If you would like to contact our Data Protection Officer, you may do so using the following details:

Email: GroupDPO@sse.com

Postal: Data Protection Officer, No. 1 Forbury Place, 43 Forbury Road, Reading, RG1 3JH

11.3 If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the relevant Data Protection Office:

Republic of Ireland:

Data Protection Commissioner

Dublin Office:

21 Fitzwilliam Square
Dublin 2
D02 RD28

Portarlington Office:

Canal House, Station Road, Portarlington

Northern Ireland:

Information Commissioner's Office:

Wycliffe House,
Water Lane
Wilmslow,
Cheshire SK9 5AF