



Privacy Notice

Last Reviewed: 13th April 2018

About this Privacy Notice

Crown Gas and Power is committed to protecting your personal data when you are using our services. This privacy notice relates to our use of any personal data that we collect from you whether in the course of supplying natural gas, providing siteworks services, or providing you with access to our online portals.

We will comply with data protection law which requires that personal data we hold about you is:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

This privacy notice will, therefore, inform you as to who we are, what personal data we collect, the purposes for which we use it, how long we retain it, how we will keep it secure and your rights in relation to your personal data and how you can contact us to discuss or query the personal data we hold about you.

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1 Who We Are

Crown Gas and Power is a trading division of Crown Oil Limited and a member of the Crown Group of Companies. Crown Oil Limited is registered in England and Wales (company number 1315556) and has its registered office located at The Oil Centre, Bury New Road, Heap Bridge, Bury, Lancashire, BL9 7HY. Crown Oil Limited and Crown Gas and Power Limited are both **data controllers** and are registered with the Information Commissioner's Office (**ID Z9218091** and **ID ZA338076**).

Crown Oil Limited trading as Crown Gas and Power shall be responsible for all data processing activities. Should a change of responsibility occur this privacy notice shall be updated and communicated.

Crown Gas and Power supplies natural gas to premises throughout the mainland United Kingdom. We also provide sitework solutions for gas, electricity and water services connecting homes and businesses throughout the country.

How to Contact Us

Crown Gas and Power operate from one location and can be contacted directly on the details below:

Crown Gas and Power
Crown Point
Heap Bridge
Bury
BL9 7JR

Telephone Number: 0161 762 7744* (Monday to Thurs 08:30 to 17:30, Friday 08:30 to 17:00)

Email: hello@crowngas.co.uk

Website: www.crowngas.co.uk

*Please note that calls to and from the above number maybe recorded for quality and training purposes.

2 Why we process your personal data

We collect and process personal data in order to perform the contract we have entered with you (or discharge other contractual obligations) or to comply with our legal obligations. Also, we will collect and process personal data where we have a legitimate interest (and your rights do not override that interest), for example we collect Cookies to help improve your experience on our web portal.

We are licensed and regulated by Ofgem which means we have to operate and communicate with our customers in a way which is fair, honest and transparent. This means that we have to process personal data in a specific way so that we can comply with our license. For example, this may mean contacting you in advance to inform you of the ways you can renew your agreement with us.

Your safety is also important to us, so we may need to collect and process personal data to ensure we can meet current health and safety requirements as set out in current legislation (such as the Gas Act 1995) and industry codes of practice.

3 Our personal data sources

We can collect personal data from any of the sources listed below.

- Third-party intermediaries (**TPIs**) who are working on your behalf by producing a valid letter of authority
- Publicly available information. For example, we may use Companies House, the Royal Mail, UK Land Registry, and information provided to us via listed search engine results such as Google.
- Information that you provide to us. This can include contact details provided to us when a contract was agreed or upon contacting us by email or telephone.
- Industry parties including meter asset manager, automated meter read (**AMR**) service providers, meter reading agencies, debt recovery agencies, network transporters and other market participants such as suppliers and shippers.
- In the case of a change of occupancy, personal information (such as a contact name and telephone) may have been provided to us by your landlord or the previous occupier.
- Information you provide by visiting our website; completing online forms, contracting with us, or contacting us.

4 How we will inform you about our privacy notice

A free hard copy of this privacy notice can be requested by contacting our Customer Experience team on the details below:

Telephone: 0161 762 7744* (Monday to Thurs 08:30 to 17:30, Friday 08:30 to 17:00)

Email: hello@crowngas.co.uk **Website:** www.crowngas.co.uk

Where you have agreed a contract indirectly using a third-party intermediary (**TPI**), we will inform you where you can access this privacy notice within one month of your contract being agreed.

We will not use your personal data for any new, different or incompatible purposes from that set out below without first informing you. Changes made to this privacy notice will be updated on our website, web-portals and clearly signposted on key touch-point documents.

5 The purposes your personal data is collected and processed

We collect personal data with the overall aim of providing a better service to all of our customers and industry partners.

Personal data we collect from you is not sensitive. For example, we will never ask or process data relating to race, religion or ethnicity.

Most personal data is collected indirectly using a third-party intermediary (**TPI**), although we may have collected it through other alternative sources for a legitimate purpose as set out in Section 12. We will only work with a TPI where we have a formal agreement in place and the TPI can prove that they are instructed to act on your behalf by providing us with a valid letter of authority.

The personal data categories identified below are relevant and specific for the services that we offer. The listing also describes how and why we process them.

5.1 Contact details (including company details, contact names, telephone numbers and email addresses)

This data allows us to contact you for matters relating to invoicing, your contract, your account, your agreement or metering equipment.

- Contractual purpose
- Legal purpose

Such data will also be used to provide you with electronic billing information and provide you with access to our web portal services.

Company details (such as a company name) allow us to carry out a credit check so that an accurate quotation can be provided for new business or renewal purposes.

On occasions we will share your contact details with our agents (such as meter reading or meter asset management company) who may need to contact you on our behalf to obtain a meter reading, rectify a query with your metering equipment or contact you should there be an emergency or a matter related to theft.

Most contact details are provided to us initially by a third-party intermediary (**TPI**) prior to or during the agreement of a contract. In some cases, we may need to obtain alternative contacts (for example a facilities manager) who may be best suited to assist us should we have a specific query. Where we have no contact details, we may sometimes take proactive steps to collect data using desktop research (such as internet searches) or sending representatives to your premises on our behalf.

There may be an impact on the level of service that we can provide should there be no, or inaccurate, contact details. For example, we may need your contact details so that we can inform you of changes to your agreement or discuss an invoice.

5.2 Meter point details (including meter point reference number, meter serial number, address and meter readings)

Premises which are connected to the utility network typically have a unique identification such as a meter point reference number which can be linked to a meter serial number and/or other apparatus such as an automated meter reader (**AMR**). These items are linked to your address and are stored on a central Industry database.

- Contractual purpose
- Legal purpose

Meter readings (provided by you, a third-party intermediary (**TPI**) or by an **AMR** or Smart Meter) are processed against your meter point reference number so that we can charge you. Readings are shared with the Industry for costing and statistical purposes.

We collect meter point details through a **TPI** or by the Industry prior to or during the fulfilment of a contract. This data enables us to switch your supply, invoice you accurately and instruct any third party agencies (such as a meter reader) to attend your premises in the performance of our contract or in an event of an emergency.

Where no formal gas supply agreements exist (for example where there is a change of occupancy or erroneous transfer) we will process such data in line with our supply license and

applicable legislation such as the Gas Act of 1995.

5.3 Bank or Payment Details

This data may be provided to us upon or during the term of a contract and is provided to us either directly by you or by a third-party intermediary (TPI). Such data can be information related to the setting up of a direct debit, which we will process in accordance with the direct debit guarantee scheme.

- Contractual purpose
- Legal purpose

We also take credit and debit card payments over the telephone and may ask you to confirm your bank details by email in order to make payments directly into your account.

These processing activities enable us to charge you for the energy you consume, services we provide or make payment as part of our wider contractual obligations owed to you.

5.4 Telephone call recordings

External telephone calls are recorded for training, security and auditing purposes.

Sometimes a contract can be agreed verbally by a third-party intermediary (TPI) or by us directly as part of our service offering. In such cases it will be made clear to you that your expressed consent will be used as the basis for which a contract has been agreed and personal data can be processed.

5.5 Electronic and hardcopy correspondence

We may collect and process electronic and hardcopy correspondence (such as emails, invoices, consumption statements and letters) as part of either a contractual obligation or a wider legitimate interest.

- Contractual purpose
- Legal purpose
- Legitimate interest

When you contact Crown Gas and Power for any reason, we may keep a record of our communication to help solve a query and to support our customer service delivery operation.

5.6 IP addresses and Cookies

When you access our website and web portal we may collect data relating to your computer including its IP address. Such data is anonymous in its form and allows us to carry out statistical analysis of browsing behaviour.

- Consent
- Legitimate interest

Our website uses cookies such as Google Analytics to collect information about how you use our website. The cookies provide us with anonymous information showing us the number of visitors to our website, the device they have accessed it by and which web browser they are viewing it on. This data allows for statistical analysis and helps us understand our customer behaviour better and optimise your online experience.

Cookies, also, provide a convenience feature to save you time. For example if you personalise a web page or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. This simplifies the process of delivering relevant content and eases site navigation.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can set your browser not to accept cookies and the above websites will inform you how you can remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

6 Who we will share your personal data with

We may share your personal data with:

- A regulatory authority (such as Ofgem) or the police in the course of meeting a supply license requirement or in matters relating to fraud prevention, detection or other legal concerns.
- A third-party intermediary (**TPI**) should they be able to provide us with a valid letter of authority (**LOA**) that shows that they are legitimately working on your behalf. Your personal data will not be shared where an **LOA** is invalid.
- Third-party agencies such as meter read organisations, meter asset managers and debt collection agencies. This is done so that we can meet our license obligations and/or for contractual purposes.
- Utility networks and infrastructure companies in the course of fulfilling a contractual obligation (such as a service installation) or for health and safety purposes as required by law.
- Credit agencies who can minimise our credit risk.
- Gas suppliers, shippers and transporters for matters relating to supply, billing and/or query resolution. Such processing is required for supply license reasons and industry codes.
- Third parties should we sell any or all of our business and/or our assets to a third-party.

7 Transferring your data outside of the European Economic Area

Some of our processing activities may involve your personal data being transferred to a third-party agency who may in turn process your data outside of the European Economic Area (**EEA**). In such instances the transfer of data outside of the EEA is necessary for the performance of a contract between ourselves and that of our processing partner.

8 Safeguarding your personal data

Crown Gas and Power takes all reasonable steps to ensure that appropriate safeguards are in place to protect your personal data. For example we ensure that our staff are properly trained so that they can process your data securely and safely.

Safeguards are regularly reviewed by senior management as part of our wider data protection policy which has an overall objective of preserving the confidentiality, integrity and availability of personal data.

9 How long we retain your personal data

Your personal data will be retained by us for as long as there remains a valid lawful basis for retaining it. When personal data is no longer relevant, associated processing activities will become severely restricted. For example, if you switch supplier we will no longer process data related to you.

Accounting information (such as invoices) will be retained for at least 6 years in line with current tax legislation.

10 Your rights as a data subject

To ensure fair and transparent processing it is important that we inform you of your rights with regards to how your personal data is processed. Where you wish to exercise a right, we have signposted the best contact details for you to get in touch with us. Naturally we will need to confirm your identity before your request can be processed.

10.1 Your right to be informed

This is our privacy notice which informs you of who we are, why we are processing your personal data, with whom we share your personal data with and how we have collected it. These details are set out above.

Our privacy notice can be found on our website and is signposted on our web portals and other key business documentation (such as on contracts). Our staff are trained to provide this notice on request, or orally.

If you would like to discuss this privacy notice or suggest ways which we could improve the content or its communication then please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will point your enquiry to the right department.

10.2 Your right to access

As a data subject you have the right to access the personal data we hold about you and check that we are lawfully processing it. A documented process and form is available from our website.

To raise a data subject access request (**DSAR**) is free and can be done in writing by emailing us at datamanager@crowngas.co.uk or alternatively writing to us at:

The Data Manager
Crown Gas and Power
Crown Point
Heap Bridge
Bury
BL9 7HY

You can also speak to a member of staff on 0161 762 7744 who will put you in contact with the data manager should you have any questions or queries relating to a DSAR.

In line with legal requirements we do not have a data protection officer due to the nature and volume of our processing activities. However, we have appointed a data manager who will act in an equivalent capacity.

Once we receive your request we will ask you to verify your identity and ask you to specify the data or processing activity that you require so that we can confirm your expectations and respond within one month.

We do have the right to refuse a DSAR should it be manifestly unfounded or excessive and we can apply a reasonable fee and/or extend the time to respond should the request be complex (in which case you would be informed within 1 month). We do have the right to charge a reasonable fee if you make numerous requests for the same information.

10.3 Your right to rectification

Where personal data is inaccurate or incomplete you have the right for it to be rectified on our systems. In such cases we will act promptly to put things right.

So that we can quickly resolve your query we may ask you to provide some supporting evidence to show that the data needs to be altered. For example, in order for us to update the address associated with your meter point reference (**MPRN**) we will require the address to be updated with Royal Mail first. As a second example, in order for us to update a meter serial number we would require a clear photograph of your meter.

If you require your personal data to be rectified please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will pass your request on to the relevant team.

10.4 Your right to erasure

This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to processing it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to withdraw consent (see below).

Sometimes, however, we may refuse a request to erase such data in order, for example in order to comply with a legal obligation.

If you require your personal data to be erased please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will assist you in your query or pass you on to the relevant team.

10.5 Your right to restricted processing

This enables you to ask us to restrict the processing of your personal data. For example, if you do not want us to erase your data you may ask us to restrict our processing activities instead. A good example would be electronic invoicing.

If you wish for restricted processing to be applied to your personal data please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will pass your request on to the relevant team.

10.6 Your right to data portability

To help strengthen your control over your data, you have the right in certain circumstances to receive personal data from us in a format which allows you to easily access it. For example, you may want your meter readings in an Excel format.

We may ask you to specify what data you wish us to provide you, or we may direct you to an existing service that we already provide where you can freely obtain the information. Where we can we will try and provide you the data in a common format which is transferable with other data controllers.

Should you wish to exercise your right to data portability please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will pass your request on to the relevant team.

10.7 Your right to withdrawing consent

In circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing activity at any time. For example, it could be the case that you need to notify us that a Letter of Authority has been revoked.

To withdraw your consent, please contact Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will pass your request on to the relevant team.

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so such as a contractual or legal reason.

10.8 Your rights relating to automated decision making

Details of what automated decision-making activities we carry out are described below in Section 13. If you wish to speak to a member of our team to understand the decision made, obtain an explanation of the decision and challenge it then please contact our Customer Experience team on 0161 762 7744 or hello@crowngas.co.uk who will pass your request on to the relevant team.

We may reject your request not to be subject to automated decision making where such activity is a necessary step in our contracting process or is required in the performance of a contract between us.

11 Reporting a concern to us or to the Information Commissioner's Office

If you have a concern regarding how we handle your personal data then we kindly request that you inform us about it first so that we can work with you in an effort to resolve it.

You can report a concern or raise a complaint with us initially by contacting us at complaints@crowngas.co.uk or contacting our customers service team on 0161 762 7744 who will pass you onto the relevant person.

Alternatively, you can write to us by sending your letter to:

Crown Oil Limited t/a Crown Gas and Power
Crown Point
Heap Bridge
Bury
BL9 7HY

We aim to acknowledge your complaint within two business days and provide a resolution within 28 days. If we are unable to meet this timescale we will write to notify you in advance.

If you are not satisfied with our proposed resolution to your complaint you can raise the matter directly with the Information Commissioner's Office (ICO). The ICO will take steps to address your concern and provide guidance and support to us so that we can put things right.

Crown Oil Ltd is a **data controller** and is registered with the Information Commissioner's Office (ID **Z9218091**).

Details as to how to get in touch with the ICO or report a concern can be found on their webpage <https://ico.org.uk/concerns/>

12 Your right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data infringes any of your rights set out in paragraph 9 You have the right to lodge a complaint with the relevant supervisory authority in the European State that you reside, or work or in the place of the alleged infringement; the relevant supervisory authority for the UK is the Information Commissioner's Office.

The supervisory authority with which the complaint has been lodged shall inform you of its progress and the outcome of the complaint including the possibility of a judicial remedy.

13 The automated decision-making processes we operate

There are some automatic decision processes that we operate to which we should draw your attention. The purpose of this automation is necessary for us to agree or renew a contract with you or to allow us to meet a contractual obligation.

Automated decision making can include credit checks, the provision of an estimated bill or determining the annual energy consumption for your premise. Where we process your data for a contract purposes we are not compelled to explain the decision made. However, to show good customer service we will try and provide you with an explanation where we can within a reasonable time.

14 Other Websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

15 Getting in touch with us

If you would like to discuss this privacy notice or suggest ways in which we could improve the content or its communication then please contact our customer services team on 0161 762 7744 or hello@crowngas.co.uk