



# Data Protection Policy (Customer)

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## Introduction

EnDCo (EPG Energy Ltd) needs to hold certain information about its customers to allow it to:

- Provide and perform its contractual duties to the customer.
- Generate proposals to potential customers.
- Ensure Electricity Industry Governance may be complied with.
- Meet legal obligations and government requirements such as tax via HMRC.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this EnDCo must comply with the General Data Protection Regulations (GDPR). In summary these state that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

EnDCo staff who process or use any personal information must ensure that they follow these principles always. To ensure that this happens, EnDCo has developed this Policy.

## Customer Data Access

All customers are entitled to:

- Know what information EnDCo holds and processes about them and why;
- Know how to gain access to it;
- Know how to ensure it is kept up to date;
- Know what EnDCo is doing to comply with its obligations under GDPR;
- Know they have the right to withdrawn data use (full or partial) permission;
- Know they have the right to data deletion;
- Know they have 'the right to forget'. EnDCo must remove all data from all systems where reasonably practicable except:
  - where required to be kept by law (i.e. tax invoices) and;
  - where minimal data is maintained on a 'Do Not Contact List'.

## Data Security

When EnDCo collects information about other people, it must comply with the following data security requirements.

EnDCo is responsible for ensuring that:

- Only required data is collected for legitimate use or processing.
- Any personal data which is collected is kept securely.
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Should such a breach occur it must be reported to the Data Protection Officer who will subsequently report it to the ICO.

Unauthorised disclosure or data breaches will be reported to the ICO by the Data Protection Officer.

Personal information will be subject to restricted access:

If physical data (i.e. paper copy) the data will be kept in a secure location such as an office with physically restricted access, such as a key coded door. Where possible the data should also be kept in a lockable location such as a filing cabinet or desk draw.

If data is computerised, the data must be password protected on PC, server or other networked computer device, or kept only on an electronic storage media which itself is kept securely (e.g. USB disk, external hard drive). Where such media is used the media should be encrypted.

## Rights to Access Information

Any person who wishes to exercise their right to either request notification of the information currently being held on them, change/remove permission to hold or process their data or any other personal data related request, should make a formal request initially to EnDCo's Data Protection Officer, or in the DPO's absence, any other available Director. The request should be made in writing but the format is optional.

Normally no charge will be made regarding data management requests, however EnDCo reserves the right to charge the requestor £10 on each occasion a data management

request is made if EnDCo deems the requestor is making an unreasonable number and/or high frequency of requests.

EnDCo aims to comply with requests for access to personal information as quickly as possible, and will ensure that it is provided within 5 business days, unless there is good reason for delay. In the event of the 5 business days timeframe not being met EnDCo will advise the requestor of the reason for delay and an eta for the request completion.

## Subject Consent

EnDCo can only process personal data with the consent of the individual. All personal data held prior to 25/05/2018 has had explicit permission to be retained from the individual the data pertains to.

All new data required after 25/05/2018 will have explicit consent obtained prior to acquisition and subsequent use.

## Status of the Policy

Any member of staff, who considers that the policy has not been followed in respect of personal data about customers, should initially raise the matter with Data Protection Officer, or in the DPO's absence, any other available Director.

## The Data Controller and the Designated Data Controllers

EPG Energy Ltd (trading as EnDCo) is a Limited company and the ultimate data controller and processor.

EPG Energy is registered with the ICO, regno: ZA120042

(<https://ico.org.uk/ESDWebPages/Entry/ZA120042>)

The Board of Directors is ultimately responsible for implementation of this policy, however day to day enforcement and management of the policy will primarily reside with the Data Protection Officer.

## Queries

Any queries regarding this policy should initially be sent to:

Data Protection Officer  
EnDCo  
Hurst House  
131-133 New London Road  
Chelmsford  
Essex CM2 0QT

Tel: 01245 254 910

Email to [endco-dpo@endco.co.uk](mailto:endco-dpo@endco.co.uk)

