

# Privacy Policy



**inenco**  
Better Business Greener World

# Version Control

Document Reference: Privacy Policy

Author: Head of Legal

Approved by: CEO and HR Director

Effective Date: 04/2024

Next Review Date: 04/2026

Controlled Document (Uncontrolled if printed)

Document History and Version Control		
Version	Date Approved	Author
1.0		Human Resources
2.0	04/2024	Legal

## Table of Contents

1.0	Introduction .....	4
2.0	Scope.....	4
3.0	Data protection .....	4
4.0	Marketing and Promotional materials.....	7
5.0	Privacy Controls .....	7
6.0	Cookies.....	7
7.0	Security .....	8
8.0	Sharing your personal information .....	8
9.0	International transfers of your personal information .....	9
10.0	Your Rights .....	9
11.0	Contact Details.....	10

## 1.0 Introduction

Inenco Group Limited is committed to ensuring that your privacy is protected, and we comply with the General Data Protection Regulation and other applicable data protection rules (including the Data Protection Act 2018 and marketing and cookies laws, together with associated guidance) **(the "Data Protection Laws")**.

Please contact us if you have any questions, comments or concerns about this policy or how we handle your personal information, or if such information changes at any time. This website (the "website") is run by Inenco Group Limited (company no. 02435678 with registered office at Ribble House, Ballam Road, Lytham St. Annes, Lancashire, FY8 4TS) (ICO registration: Z8251210) ("we" and "us"). For the purpose of the Data Protection Laws, we are the controller of the personal information processed for the purposes set out below and we are responsible for looking after it.

Please note: this policy does not cover third party websites that we may link to from our website, unless specifically mentioned in this policy. We are not responsible for the privacy policies and practices (including use of cookies) of such third parties even if you accessed the third-party website using links from our website. We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

Any changes to this policy in the future will be posted on this page and, where appropriate, notified to you by email. We will also post a notice on the website landing page and on appropriate pages on the website. Please check back frequently to see any updates or changes to this policy.

## 2.0 Scope

This policy explains how we use, store and share the information we collect about you, how you can exercise your rights in respect of that information and the procedures that we have in place to safeguard your privacy. This policy supplements any other fair processing or privacy notice that may be provided to you from time to time.

## 3.0 Data protection

Under the Data Protection laws, we are required to explain what information we collect from you and how and why we use your personal information (the "processing activity"). We are also required to have a "lawful basis" on which to process your personal information. This is summarised in the table below:

Processing activity: Why we use your information?	What information is collected?	Lawful basis of processing	Where is the information collected from?	How long do we keep the information for?
<p><b>Actual/prospective customers (including their end users/customers), suppliers and third parties.</b></p> <p>We require your information in order to respond to enquiries, set up, maintain and manage your account/ contract and in order to comply with our statutory and regulatory obligations. A failure to provide this information will therefore unfortunately mean you will not be able to work with us and/or receive our services.</p> <p>Calls are recorded for training, monitoring and account management purposes.</p> <p>.</p>	<p><b>Actual/prospective corporate customers, suppliers and third parties</b></p> <p>Name, title, job title, workplace address, phone number, email address (of any connected person, for example a worker, employee, consultant etc.).</p> <p><b>SME customers, suppliers and third parties (sole traders and partnerships)</b></p> <p>In addition to the above: Address, energy data (e.g., consumption levels, site and meter details, supply information), credit information (to allow for credit checking), date of birth.</p> <p><b>General</b></p> <p>In addition to the above, we</p>	<p><b>Actual/prospective corporate customers, suppliers and third parties</b></p> <p>The lawful basis on which we process this information is (a) because it is in our legitimate interests to do so, as we would not be able to work together without the use of this information; or (b) to comply with our legal obligations (e.g., in respect of HMRC/ taxation rules).</p> <p><b>SME customers, suppliers and third parties (sole traders and partnerships)</b></p> <p>The lawful basis on which we process this information is (a) to take steps at your request to enter a</p>	<p>Directly from you (or the party to which we have the relationship – e.g., your employer, or managing agent)</p>	<p>For the duration you work with us and for 6 years following this</p>

	also collect information you volunteer to us when you contact us (e.g., by phone or email).	contract with you and for the ongoing performance of such contract or (b) to comply with our legal obligations (e.g., in respect of HMRC/ taxation rules).		
<p><b>To market our services to prospective/ existing customers.</b></p> <p>Calls are recorded for training, monitoring and account management purposes.</p>	Name, title, job title, phone number, workplace address, email address	<p><b>Prospective/ existing corporate customers</b></p> <p>The lawful basis on which we process this information is because it is in our legitimate interests to do so (as we consider it necessary to review and address leads for new business)</p> <p><b>Existing SME customers (sole traders and partnerships)</b></p> <p>The lawful basis on which we process this information is legitimate interests (as set out above)</p> <p><b>Prospective SME customers (sole traders</b></p>	Directly from you or selected third party providers. We may also occasionally verify data we hold to check accuracy with third party providers.	<p>Prospective customers: Our prospect base is reviewed and refreshed every 12 months.</p> <p>Existing customers: this information also forms part of the account data (see above).</p>

		<b>and partnerships)</b> The lawful basis on which we process this information is consent.		
<b>For recruitment purposes</b> For recruitment and to process employment applications	Please see our Applicant Privacy policy			

We have determined, acting reasonably and considering the circumstances, that we are able to rely on legitimate interests as the lawful basis on which to process your personal information in certain circumstances (we have stated this above and set out our legitimate interests). We have reached this decision by carrying out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual.

We consider that it is reasonable for us to process your information for the purposes of our legitimate interests outlined above as: (a) we process your information only as far as is necessary for such purpose; and (b) it can be reasonably expected for us to process your information in this way.

You should not provide us with any other individual’s personal information, without their knowledge.

## 4.0 Marketing and Promotional materials

We may use your personal information to provide you with marketing and promotional materials (as stated above). We do so for our own purposes and will never share your personal information with third parties for marketing purposes. You may opt-out of receiving marketing and promotional materials from us at any time by contacting us, asking us to (where this is on the telephone) or using the 'unsubscribe' link in the marketing or promotional email. You may also update your preferences to receive marketing or promotional materials by emailing [enquiries@inenco.com](mailto:enquiries@inenco.com).

## 5.0 Privacy Controls

By emailing [enquiries@inenco.com](mailto:enquiries@inenco.com), you can request access to your information and specify how we are able to contact you.

## 6.0 Cookies

We use cookies on our website. If you would like to learn more about cookies and how to manage them please view our Cookie policy on our website which can be found at <https://www.inenco.com/cookie-policy/>.

## 7.0 Security

We have in place appropriate policies, rules and technical and organisational measures to protect your personal information from unauthorised or unlawful processing, and against accidental loss, destruction or damage.

We also have procedures in place to deal with any data security breach. We will notify you and any applicable regulator of a data security breach where we are legally required to do so.

However, the Internet and email are not secure. Your communications may route through a number of countries before being delivered, may be intercepted by third parties and may not always reach the intended recipient – this is the nature of the world wide web/Internet. We cannot accept responsibility for any such unauthorised access or loss of personal information that is beyond our control.

You are responsible for protecting your username and password and must not share it with, or disclose it, to anyone.

## 8.0 Sharing your personal information

We will only disclose your personal information to:

- companies within our group;
- our professional advisors (including without limitation tax, legal, insurance or other corporate advisors who provide professional services to us);
- other third-party suppliers who support us in delivering services to you. This may include (for example) the sharing of contact information to enable a third-party supplier to attend your site and carry out on-site installations of equipment/ meters;
- other third-party suppliers, business partners and sub-contractors for business administration, support, processing, services, or IT purposes;
- analytics or search engines, which enable us to optimise and improve your Website experience;
- third parties that you approve (including without limitation, social media sites);
- our regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, the police and any other authorised bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters; and
- HMRC or other tax bodies or agencies to comply with our legal and regulatory obligations.

We will disclose your personal information to third parties:

- in the event that we consider selling or buying any business or assets, in which case we will disclose your personal information to any prospective sellers or buyers of such business or assets;
- in the event we are the subject of any insolvency situation (e.g., the administration or liquidation);
- if we, or substantially all of our assets, are acquired by a third party, in which case personal information held by us about our customers, suppliers and third parties will be one of the transferred assets;
- in order to enforce or apply our terms and conditions for the provision of services, or our terms of use applicable to the Website;
- to protect our rights, property, or safety, or that of our staff, our customers, or others. This includes exchanging information with other companies and organisations (including without limitation HMRC, the local police or other local law enforcement agencies) for the purposes

of staff and customer, supplier or third-party safety, crime prevention, fraud protection and credit risk reduction; and

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

Please note, the further processing of your personal information once shared in the way(s) set out above, is not covered by this policy. We expect (but cannot confirm) the third parties listed above will each have their own privacy policies and practices, for which we are not responsible. It is each third party's responsibility to furnish you with a copy of its privacy notices/policy. Notwithstanding the foregoing, if you feel we can support you with this, please do contact us (as set out below) and we will see what we can do to help.

## 9.0 International transfers of your personal information

We may transfer personal information to countries other than the country in which the data was originally collected (for example, outside the UK/EEA) in order to provide you with our services. These countries may not have the same data protection laws as the country in which you initially provided the information and may not provide the same level of protection. In particular, many of our standard IT providers (not unlike most other businesses) are based in the United States and may provide support from other locations.

If we transfer personal information to countries outside of the EEA, we may rely on a decision from the European Commission determining that the country provides an adequate level of protection to the Data Protection Laws. Alternatively, we may rely on appropriate safeguards in respect of transfers of personal information to a country outside of the EEA, for example, by agreeing standard contractual clauses adopted by the European Commission.

A copy of the standard contractual clauses are available on the European Commission's website.

## 10.0 Your Rights

Right	Description
To be informed	A right to be informed about the personal information we hold about you.
Of access	A right to access the personal information we hold about you.
To rectification	A right to require us to rectify any inaccurate personal information we hold about you.
To erasure	A right to ask us to delete the personal information we hold about you. This right will only apply where (for example): <ul style="list-style-type: none"><li>• we no longer need to use the personal information to achieve the purpose we collected it for;</li><li>• where you withdraw your consent if we are using your personal information based on your consent; or</li><li>• where you object to the way we process your data (in line with Right 5 below).</li></ul>
To restrict processing	In certain circumstances, a right to restrict our processing of the personal information we hold about you. This right will only apply where (for example): <ul style="list-style-type: none"><li>• you dispute the accuracy of the personal information held by us;</li><li>• where you would have the right to ask us</li></ul>

	to delete the personal information but would prefer that our processing is restricted instead; or • where we no longer need to use the personal information to achieve the purpose we collected it for, but you need the data for the purposes of establishing, exercising or defending legal claims.
To data portability	In certain circumstances, a right to receive the personal information you have given us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal information to another organisation, at your request.
To object	A right to object to our processing of the personal information we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process the personal information which override your rights or which are for the establishment, exercise or defence of legal claims.
In relation to automated decision making and profiling	A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you.
To withdraw	A right to withdraw your consent, where we are relying on it to use your personal information.

## 11.0 Contact Details

We welcome your views about our website and this policy. If you would like to contact us with any queries or comments, request further information or exercise any of your available rights set out above, please contact us using the following details:

- By post: Inenco Group Limited, Ribble House, Ballam Road, Lytham, Lancashire, FY8 4TS
- By email: [enquiries@inenco.com](mailto:enquiries@inenco.com)
- By telephone: 01253 785 000

If you are an existing customer, supplier or third-party partner working with us, you can also contact your usual Inenco contact or account manager for support.

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your personal information and if you are not satisfied with a resolution, or have further queries or concerns, our Data Protection Lead can be contacted at [RiskandCompliance@inenco.com](mailto:RiskandCompliance@inenco.com)

If you are still not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to our supervisory authority, which is the UK's Information Commissioner's Office. Details of how to contact the Information Commissioner's Office can be found on its website. <https://ico.org.uk/>.

[www.inenco.com](http://www.inenco.com)

