

Privacy Notice for Heat Network Consumers

How we use your personal information

Heat Supplier / data controller	Emerald House RTM Company Limited
Heat network / site	Emerald House
Privacy contact	Data Protection Officer c/o Ginger Energy Email: privacy@gingerenergy.co.uk Telephone: 0345 307 3433 Registered address: Stonemead House, 95 London Road, Croydon, Surrey, United Kingdom, CR0 2RF

Please read this notice. It explains how the Heat Supplier uses personal information about people connected with properties supplied by the heat network. Complete the site-specific details above before issuing it.

Who this notice applies to

This notice applies to people who receive, pay for, live at, own, manage or contact us about a property served by the heat network. This includes residents, occupiers, tenants, leaseholders, landlords, managing agents and authorised representatives.

Who is responsible for your information

The data controller is the organisation named above. It decides how and why personal information is used for the heat-network services it is responsible for.

The data protection contact details for the Heat Supplier are set out in the document information table above.

We may appoint organisations to operate the network, manage the building, administer accounts, bill customers, collect payments, provide metering, communicate with residents or carry out maintenance. They may process information for us. Where another organisation decides how and why it uses information for its own function, it may be a separate or joint controller. The site-specific Data Roles Schedule and resident information identify the relevant parties and contact routes.

If Ginger Energy administers your account, it does so on behalf of the Heat Supplier unless we tell you otherwise for a particular activity.

Information we collect

We collect only the information needed to provide and manage the heat-network service, support residents and meet legal and regulatory responsibilities. This may include:

- name, address, contact details, account reference and property details;
- tenancy, leaseholder, occupier, landlord and authorised-representative details;
- billing, payment, direct-debit, refund, arrears and payment-plan information;
- meter readings, consumption information and read-validation records;
- enquiries, complaints, correspondence, communication preferences and accessibility needs;
- PSR, vulnerability, health, disability or welfare information where relevant; and
- fault, outage, emergency, access, safety, audit, dispute and regulatory-reporting records.

Meter readings and consumption data can be personal information when they can be linked to an identifiable person, account or property.

Where we get information from

We may receive information directly from you, from someone authorised to act for you, from a leaseholder, tenant, occupier, landlord or managing agent, and from our billing, payment, metering, customer-service and operational systems. We may also receive relevant information from operators, contractors, payment providers, complaint bodies, regulators, auditors, courts, tribunals, or a previous or successor supplier/operator where needed for continuity of service.

Why we use information and our lawful bases

We use your information to manage accounts; supply heat and hot water; issue bills; take payments; process refunds; manage meter data; respond to enquiries, maintenance needs, faults and outages; deal with complaints and payment difficulty; prevent fraud; maintain records; meet legal, regulatory, audit and consumer-protection duties; and provide PSR, vulnerability, welfare or emergency support.

We rely on one or more lawful bases depending on the purpose: performance of a contract or steps taken at your request; compliance with a legal obligation; legitimate interests in operating a safe, secure and reliable heat network; vital interests in an emergency; and consent where we specifically ask for it. Where we use health, disability or other special-category information, we apply the additional condition required by data-protection law. We will ask for explicit consent where that is the appropriate condition.

Priority Services Register and additional support

The PSR is free and confidential. A resident or occupier can tell us about a need for extra support; they do not have to be the named account holder. We use the minimum information needed to provide appropriate help, for example during an outage, emergency or service interruption, or to provide communications in an accessible format.

We treat information about health, disability, age, communication needs, financial hardship, vulnerability and PSR support as particularly confidential. We do not use it for marketing, to disadvantage you, or to apply pressure in payment discussions.

Who we share information with

We share personal information only where necessary, proportionate and lawful, and only the minimum required. This may include appointed billing, account-administration, payment, debt-support and communications providers; the operator, managing agent, contractors and metering providers; professional advisers and auditors; complaint-handling or Ombudsman bodies; Ofgem, other regulators, courts, tribunals and other lawful authorities; emergency services or welfare organisations; and a successor supplier or operator where needed for continuity of service.

Where suppliers process information for us, we require appropriate contractual and security safeguards. They must not use information for unrelated purposes unless they have their own lawful basis and are legally entitled to do so.

Representatives, occupants and emergencies

We take reasonable steps to check identity and authority before discussing account-specific information. We may speak to a person you have authorised, within the scope of that authority. Occupiers and third parties may report faults, emergencies, outages, access issues, complaints or support needs, but we will not disclose account, payment, debt, billing or complaint information to them unless they are authorised or another lawful exception applies.

In an emergency or serious welfare or safety situation, we may share the minimum information necessary to protect life, health, safety or essential supply.

International transfers and automated decisions

We will not transfer personal information outside the UK unless the transfer is lawful and appropriate safeguards are in place. We do not make solely automated decisions with legal or similarly significant effects unless this is lawful and we have told you about it. We will not make a significant account decision, including restricting supply or withdrawing support, solely by automated means without appropriate human involvement, unless permitted by law.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected, unless a longer period is required for legal, regulatory, audit, complaint, dispute, safety or continuity reasons. We will not delete information needed for an open complaint, billing dispute, regulatory request, audit, investigation, legal claim or continuity handover. Complaint records are retained for at least five years. The detailed retention schedule is available on request. When records are no longer needed, they are securely deleted, destroyed or anonymised.

How we protect information

We use appropriate organisational and technical measures to protect information against unauthorised access, loss, misuse, alteration, disclosure or destruction. These measures may include access controls, confidentiality obligations, secure transfer methods, encryption where appropriate and secure disposal.

If a personal-data breach is likely to result in a high risk to your rights and freedoms, we will notify you and the Information Commissioner's Office (ICO) where required by law.

Your rights

Depending on the circumstances, you have the right to be told how your information is used; ask for access; ask us to correct inaccurate or incomplete information; ask us to erase information where it is no longer needed and we have no lawful reason to keep it; ask us to restrict or object to certain processing; ask for portability of information you have provided, where applicable; and ask for human intervention where a qualifying decision has been made solely by automated means.

To exercise a right, or to ask for this notice in another format, use the privacy contact details at the start of this notice. We may need to confirm your identity. We may be unable to meet a request in full where we have a lawful reason to keep or use the information.

Concerns and complaints

If you have concerns about how we use your personal information, please use the Data Protection Officer contact details in the document information table above.

You may also complain to the Information Commissioner's Office (ICO):

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

Keeping information accurate and changes to this notice

Please tell us if your name, contact details, billing address, communication preferences, nominated representative, access needs or PSR/additional-support needs change. We may update this notice from time to time. The current version will be available at [insert website/portal/location] or on request. Where a change is material, we will take reasonable steps to bring it to your attention.