

# Privacy Policy

Utility Aid Limited

Last Review Date: 01/06/2025

## Introduction

Welcome to the privacy policy for Utility Aid Limited.

Utility Aid Limited respects your privacy and is committed to protecting your personal data. This privacy policy explains how we handle your personal data when you visit our website (regardless of where you visit it from) and when we receive your personal data in other ways, such as from you directly or third parties. This privacy policy will tell you about your privacy rights and how the law protects you. Please use the glossary to understand the meaning of some of the terms used in this privacy policy.

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## 1. Important Information

### Purpose of this privacy policy:

This privacy policy aims to provide you information on how Utility Aid Limited collects and processes your personal data through your use of our website, including any data you may provide through our website when you ask us to get in touch with you in relation to our services and when we use your services as a supplier. This privacy policy will also provide you information on how Utility Aid Limited processes your personal data when you or a third party provide it to us through other means such as email or post.

Our website is not intended for children, and we do not knowingly collect data relating to children through our website or otherwise.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting

or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Controller:

Utility Aid Limited is the controller and responsible for your personal data (collectively referred to as "Utility Aid," "we," "us," or "our" in this privacy policy).

Charlotte Dixon is responsible for overseeing questions in relation to this privacy policy. If you need any clarification about this privacy policy, including any requests to exercise, please contact her using the details set out below.

### Contact details:

If you have any questions about this privacy policy or our privacy practices, please contact our Charlotte Dixon in the following ways:

Email: [cdixon@utility-aid.co.uk](mailto:cdixon@utility-aid.co.uk)

Post: 4th Floor The Hub, Navigation Wharf, Carre Street, Sleaford, Lincolnshire, NG34 7TW.

You are entitled to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

[Utility Aid Complaints Handling Statement](#)

### Changes to our Privacy Policy:

We keep our privacy policy under regular review and will update you as to any changes.

### Notification of Change:

It is your responsibility to inform us about any changes. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links:

Our website may include links to third-party sites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. Data We Collect About You

The majority of our business is conducted with other companies; however, as a representative of that business, you will still provide us with your personal data. We also deal with sole traders and partnerships and these individuals will

also provide us with personal data to enable us to provide our services.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data;** includes first name, last name, marital status, title, and gender.
- **Contact Data;** includes address, email address and telephone numbers.
- **Financial Data;** includes bank account and payment card details.
- **Technical Data;** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Transaction Data;** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Usage Data;** includes information about how you use our website and services.
- **Marketing and Communications Data;** includes preferences in receiving marketing from Utility Aid, Third parties and your communications preferences.

Through our website, we may also collect, use and share **aggregated data**, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law, as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **special categories** of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **If you fail to provide personal data:**

If we need to collect personal data by law or under the terms of a contract we have with you (for example, to provide the services you have requested), and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may not be able to perform the services, but we will notify you if that is the case at the time.

### **3. How Is Your Personal Data Collected**

We use different methods to collect data from and about you,

including through:

- **Direct interactions:** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email, through our website or otherwise. This includes personal data you provide when you ask about our service, contact us or ask us to contact you. All phone calls are recorded.
- **Automated technologies or interactions:** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please refer to our cookie policy for further details.
- **Third parties or publicly available sources:** We will receive personal data about you from various third parties and;
- **Technical data from the following parties:**
  - analytics providers
  - advertising networks
  - search information providers (Contact, Financial & Transactional from payment service).
  - Identity and Contact Data from our Partnerships, Data Brokers, Aggregators and from publicly available sources such as Companies House and the Electoral Register.

### **4. How We Use Your Personal Data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When it is necessary for our legitimate interests (or those of a third party), your interests and fundamental rights do not take precedence over them.
- Situations where we need to comply with a legal obligation.
- Performance of a contract with you

Please refer to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [Contacting Us](#).

### **5. Purposes For Which We Will Use Your Personal Data**

Utility Aid Limited is a utility broker for business. We provide competitive contract pricing and assist our customers in the setup and throughout their utility supply. To enable us to provide you with the right product or service to meet your needs, we will collect personal data from you.

We have listed below, in a table, how we will use your personal data and the legal bases we rely on. Where appropriate, we have also identified our legitimate interests.

Depending on the purpose, we may process your data for

more than one lawful reason. Please contact us if you need details about the specific legal ground we are relying on to process your personal data; more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
Registration as a new client	A) Identity B) Contact	A) Performance of a contract with you B) Necessary for our legitimate interests
To provide the included services: (a) manage payments, fees and charges (b) collect and recover money owed to us	A) Identity B) Contact C) Financial D) Transaction E) Marketing & Communications	A) Performance of a contract with you B) Necessary for our legitimate interests (for example, to recover debts due to us)
To manage our relationship, which include: (a) notification of change to terms and/or privacy policy (b) requesting a review or responding to an inquiry	A) Identity B) Contact C) Marketing & Communications	A) Performance of a contract with you B) Necessary to comply with legal obligation C) Necessary for our legitimate interests (maintain accurate record management to enable analytics on how clients utilise our services)
For training and quality purposes which will include conducting call reviews and delivering training as a result where required.	A) Identity B) Contact C) Financial D) Technical E) Usage F) Marketing & Communications	Necessary for our legitimate interests (for running our business, training and monitoring of staff, and for the effective provision)
For the purposes of dealing with disputes or complaints	A) Identity B) Contact C) Financial D) Technical E) Usage F) Marketing & Communications	A) Performance of a contract with you B) Necessary for our legitimate interests (resolving complaints and disputes)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	A) Identity B) Contact C) Financial D) Transaction E) Technical F) Usage G) Marketing & Communications	A) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) B) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	A) Identity B) Contact C) Usage D) Marketing & Communications E) Technical	Necessary for our legitimate interests (to analyse how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	A) Identity B) Contact C) Financial D) Transaction E) Technical F) Usage G) Marketing & Communications	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	A) Identity B) Contact C) Financial D) Transaction E) Technical	Necessary for our legitimate interests (to develop our services and grow our business)

**Marketing:**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact information, technical information, and data to form a view of what we think you may want, need, or be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or are using our services. We will offer you the opportunity to opt out of receiving marketing.

**Third-Party Marketing:**

We will get your express opt-in consent before we share your personal data with any company outside Utility Aid for marketing purposes.

**Opting Out:**

You can ask us or third parties to stop sending you marketing messages by [Contacting Us](#) at any time. Where you opt out of receiving these marketing messages, this policy will not apply to personal data provided to us as a result of the services you have purchased or any other transaction with us.

**Cookies:**

You can set your browser to block all or some cookies or to alert you when sites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please refer to our cookie policy. (Detailed below)

**Change of Purpose:**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose.

Contact us for an explanation of how the new purpose's processing is compatible with the original. If we need to use your personal data for unrelated purposes, we will notify you, and we will explain the legal basis that allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where such processing is required or permitted by law.

**6. Disclosures Of Your Personal Data**

We may share your personal data with the parties listed below for the purposes set out in the table above.

- The Glossary lists External Third Parties.
- We may choose to sell, transfer, or merge parts of our business or our assets to third parties. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- We require third parties to respect your data's security and treat it legally. We do not allow our third-party service providers to use your personal data for their purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**7. International Transfers**

Some of our external third parties are based outside the European Economic Area (EEA) so we may be required to transfer your personal data outside the EEA from time to time.

We ensure that your data is protected and that proper safeguards are in place when we transfer it out of the EEA.

**8. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorised way. In addition, we limit access to your personal data to employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have procedures to handle suspected data breaches and will notify you and any applicable regulator if required by law.

If you require further information in relation to our security, please contact Charlotte Dixon.

**9. Data retention****How long will you use my personal data for?:**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, including satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data and whether we can achieve those purposes through other means; and the applicable legal, regulatory, tax, accounting or other requirements.

Usually, we will not retain your data for longer than 6 [six] years after you cease being customers. In some circumstances you can ask us to delete your data; see your legal rights below for further information.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please find a detailed list of these rights below:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- You can object to the processing of your personal data.
- You have requested a restriction on the processing of your personal data.
- Request transfer of your personal data.
- You have the right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact [Charlotte Dixon](#).

### No fee is usually required:

You can access your data and exercise your rights for free. However, we may charge you a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### What we may need from you:

To verify your identity and your right to access your data (or exercise any other rights), we may need to ask you for specific information. We implement this security measure to prevent the disclosure of personal data to unauthorised individuals. To expedite our response, we may also reach out to you for additional information related to your request.

### Time limit to respond:

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## 11. Glossary

### LAWFUL BASIS

**Legitimate Interest:** refers to our business's interest in conducting and managing our operations to provide you with the best service/product and the most secure experience possible. Before processing your data for our legitimate interests, we consider and balance any potential impact on you (both positive and negative) and your rights. We don't use your data for our benefit if it harms you (unless we have your consent or are legally required to). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract:** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation:** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## THIRD PARTIES

### External Third Parties:

- Energy Suppliers
- Service providers function as processors, providing IT and system administration services.
- Professional advisers, such as lawyers, bankers, auditors, and insurers, function as processors or joint controllers, offering consultancy, banking, legal, insurance, and account services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

### You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This step enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This action enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This provision enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You can ask us to delete your data if you have successfully objected to processing, if we processed your data unlawfully, or if we must erase your data to comply with local law. However, we may not be able to comply with your erasure request for legal reasons, which will be notified to you at the time of your request.
- Object to processing, If you feel that processing your data on the basis of a legitimate interest (or that of a third party) affects your fundamental rights and freedoms, you can object to it. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which would override your rights and freedoms.
- Requesting restriction, You can request that we restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful, but you do not want us to erase it.
  - You require us to retain the data, even when we no longer need it, for the purpose of establishing, exercising, or defending legal claims.
  - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. This right only applies to automated information you consented to use or that we used to fulfil a contract with you.
- Withdraw consent at any time we are relying on it to process your personal data. However, your decision will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.