

Energy Marketing and Trading Privacy Notice

Energy Marketing and Trading (London), and your personal data

For our London-based energy marketing and trading activity, the data controller is Centrica Energy Limited, Centrica LNG Company Limited, Centrica LNG UK Limited.

This is our privacy notice for our energy marketing and trading activity. It explains your statutory rights and how we collect and use your personal data. It describes the processing activities that we carry out, the purposes for which these activities are performed and the legal bases that we rely upon for these processing activities.

This notice applies to personal data we hold about individuals (such as company directors, or contacts on business accounts). It does not apply to information which we hold about companies and other legal organisations. In the vast majority of cases, the data which we process for EM&T activity is not personal data.

We may update this privacy notice from time to time to ensure it is always up to date and accurate. Any changes we may make to our privacy notice will be posted on this page, and we will communicate any significant changes to you.

You can contact Centrica's data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact our data protection officer at privacy@centrica.com.

Personal data we collect

We collect the following types of personal data:

- Your contact details and the contact details of people associated with you: information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your business account.
- Purchase and account history: records relating to the products and services which you have purchased or used.
- Official identification numbers: information that allows us to verify your identity, including your passport number, national insurance number, and your driver's licence number, social security number.
- Exercising your rights: if you exercise any of your statutory rights under Data Protection Law, we will keep a record of this and how we respond.
- You are not required to provide to us any of the personal data described above, however, if you do not do so, you may not be able to trade with us.

What we use your personal data for and why

WHERE WE PROCESS YOUR PERSONAL DATA BECAUSE WE'RE LEGALLY OBLIGED TO

We process these items of your personal data because we have a legal obligation to, including:

Reason or purpose	Personal data used
Comply with Port, Terminal, or Vessel rules and The International Ship and Port Facility Security Code	Your contact details and the contact details of people associated with your business account
Screening and due diligence, including 'Know Your Customer' obligations	Official identification numbers Your contact details and the contact details of people associated with your business account
Comply with legal obligations and licence conditions	Official identification numbers Your contact details and the contact details of people associated with your business account
Understand the information we hold to ensure compliance with data protection legislation	All personal information we collect as listed in Section 2
Internal and statutory audits	Your contact details and the contact details of people associated with your business account

WHERE WE PROCESS YOUR PERSONAL DATA BECAUSE WE HAVE A LEGITIMATE INTEREST TO

We process these items of your personal data because we have a legitimate interest to do so. We process the following categories of personal data, including:

Reason or purpose	Personal data used
Running and improving our business, including trading activities	Your contact details and the contact details of people associated with your business account
Managing counterparties	Purchase and account information Your contact details and the contact details of people associated with your business account
Producing and delivering our Energy Market Report	Purchase and account information Your contact details and the contact details of people associated with your business account
Management information reporting	Your contact details and the contact details of people associated with your business account
Maintain accuracy and relevance of your data	All personal information we collect as listed in Section 2

Reason or purpose	Personal data used
For the establishment, exercise or defence of legal claims	All personal information we collect as listed in Section 2

WHERE WE PROCESS YOUR PERSONAL DATA SO YOU CAN'T BE IDENTIFIED ANY MORE

We may anonymise and aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and developing new products and services.

Sources we collect your personal data from

We will collect personal data from a number of sources. These include:

- Directly from you
- Other companies we work with: provide us with information to help us deliver our products and services to you. These include:
 - Companies in the same group of companies as us: who may provide relevant information about the products and services bought from them.
 - Counterparties and brokers: companies with which we have trading or related relationships
- Know your client” due diligence service providers: companies which provide us with KYC services

Who we share your personal data with

We share personal data with the following parties:

Who	Examples
Companies in the same group of companies as us	Our parent company, Centrica Plc
“Know your client” due diligence service providers	Thomson Reuters InfoSpectrum Crisk
Authorities, including the government or our regulators	Port authorities Information Commissioner’s Office (ICO) Office of Gas and Electricity Markets (Ofgem) Financial Conduct Authority
Debt purchasers and potential purchasers	
Police and law enforcement	

Direct Marketing

Email, SMS, post and telephone marketing: from time to time, we may contact you by email, SMS, telephone or post with information about our products and services we believe you may be interested in. When you call us we may also provide you with information about products and services we believe you may be interested in.

If you have not consented to receiving direct marketing communications, we will only send these communications to you when permitted to do so by law, but in all circumstances we will respect your marketing preferences which you set when you first create your business account with us (or you first deal with us), or which you update from time to time.

You can let us know at any time that you do not wish to receive marketing messages by sending an email to us at privacy@centrica.com. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any email marketing messages or by replying STOP to the number indicated on any marketing text messages we may send to you.

Transferring your personal data internationally

We are part of a global organisation and in common with other organisations, we use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our customers are located. This includes countries outside the European Economic Area ("EEA") and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

How long we keep personal data for

We will keep your personal data for as long as necessary in order to achieve the processing purposes.

Your rights in relation to your personal data

You may have the following rights in relation to your personal data:

- the right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the blocking or deletion of your personal data in some circumstances;
- the right to request that we port elements of your data either to you or another service provider; and
- the right to object to us processing your personal data ((1) where we have a legitimate interest to do so, as listed in section 3, but your rights override ours based on your particular

situation (which you will need to explain to us), (2) where we are processing it for the purpose of direct marketing, or (3) because we are using automated means to make decisions that have a legal or similarly significant effect).

You only have the benefits of some of the above rights in limited circumstances, which depend on the legal reason why we collected your personal data.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details below.

Getting in touch

If you have any privacy-related questions or comments, please contact Centrica's data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact our data protection officer at privacy@centrica.com.

If you are unhappy with the way we are using your personal data you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.