# **ALTO ENERGY - PRIVACY POLICY**



#### Introduction

This Privacy Notice sets out how we'll use your personal data. Your personal data is data which by itself or with other data available to us can be used to identify you. We use your personal data in accordance with Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR).

#### The types of personal data we collect and use

We'll use your personal data for the reasons set out below.

The sources of personal data collected indirectly are mentioned in this statement. The personal data we use about you may include:

### Your Name

When you sign up, we need to know your first and last name so that you can be identified. This is necessary to provide our service to you.

### E-mail Address

We will store your e-mail address for the purposes of managing your request or contract with us. This will be used for transnational emails that relate directly to our services to you. We may also use your e-mail address to send you messages about our services which may include notifications about newly launched products. If you would rather not receive these messages, please let us know

#### **Telephone Numbers**

We will store your telephone number for the purposes of managing your request or contract with us.

#### Postal Address

We require your postal address in order to write to you and provide you with an invoice for our services. This information is collected as a legal obligation and will be stored on our systems along with invoices for a minimum period of 7 years.

#### **Retention**

If you have requested a quotation or information to be sent to you your name will be retained for a period of 12 months before it is deleted unless you request it to be deleted before that time. As a customer who we have carried out work for, your name may be kept with your billing records where we have a legal obligation to store this information for a period of 7 years.

#### Providing your personal data

You must provide your personal data so we can provide you with the service that meet your needs (unless you're a customer and we already hold your details).

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# Using your personal data: the legal basis and purposes

We'll process your personal data:

- 1. As necessary to perform our contract with and deliver services that meet your needs:
  - a. To take steps at your request prior to entering into it;
  - b. To manage and perform that contract:
  - c. To update our records; and
- 2. As necessary for our own legitimate interests or those of other persons and organisations, e.g.:
  - a. For good governance, accounting, and managing and auditing our business operations;
  - b. To search at credit reference agencies (CRA's) at your home address;
  - c. To monitor emails, calls and other communications;
  - d. To send you marketing communications
- 3. As necessary to comply with a legal obligation, e.g.:
  - a. When you exercise your rights under data protection law and make requests;
  - b. For compliance with legal and regulatory requirements;
  - c. For establishment and defence of legal rights; and
  - d. For activities relating to the prevention, detection and investigation of crime;
  - e. To verify your identity, make credit, fraud prevention and anti-money laundering checks;
- 4. Based on your consent, e.g.:
  - a. When you request us to disclose your personal data to other people;
  - b. To send you marketing communications where we've asked for your consent to do so.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we can't do certain things for you.

### Sharing of your personal data

Subject to applicable data protection law we may share your personal data with:

- Product providers in relation to our seeking to source products that meet your needs;
- Companies and other persons providing services to us;
- · Our legal and other professional advisors;
- Fraud prevention agencies;
- Government bodies and agencies in the UK and overseas (e.g. HMRC and with regulators e.g., the Financial Conduct Authority, the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect your vital interests;
- To protect the security or integrity of our business operations;
- To other parties connected with your products and services
- When we restructure or sell our business or its assets or have a merger or re-organisation; and
- Anyone else where we have your consent or as required by law.

## Identity verification and fraud prevention checks

The personal data we've collected from you at application or at any stage could be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment in future. We may also search and use our internal records for these purposes.

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### Criteria used to determine retention periods (whether or not you become a customer)

The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries. We'll retain your personal data as long as necessary to deal with your queries (e.g. if your application is unsuccessful);
- Retention in case of claims. We'll retain your personal data for as long as you might legally bring claims against us; and
- Retention in accordance with legal and regulatory requirements. We'll retain your personal data based on our legal and regulatory requirements.

### Your rights under applicable data protection law

Your rights are as follows:

- The right to be informed about our processing of your personal data;
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to your personal data and information about how we process it;
- The right to move, copy or transfer your personal data ("data portability"); and

#### Contact

If you have question, want to exercise your rights or make a complaint, please contact us using the contact details below:

#### Write To Us

Alto Energy Limited, Orchard Works, Carterton Industrial Estate, Carterton, Oxfordshire, OX18 3EZ

### Call Us

01993 220699

# Email Us

info@altoenergy.co.uk

### Visit Our Website

www.altoenergy.co.uk

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