

# The Phoenix Works Privacy Policy

At The Phoenix Works we want to get to know you, but we want you to know that we are committed to protecting and respecting your privacy. This Privacy Policy explains how and why we use your personal data, to make sure you stay informed and can be confident about entrusting us with your data.

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## 1. Who are we?

We are Phoenix Renewables Ltd trading as The Phoenix Works (Company No. 7477370). Covering the whole of the UK, we offer a range of renewable technologies, specialising in optimised solar photovoltaic & battery storage systems and electric vehicle charging solutions. In this Privacy Policy, whenever you see the words ‘we’, ‘us’, ‘our’ it refers to Phoenix Renewables Limited.

How can you contact our team?

- Telephone: 0113 815 5366
- Email: [cs@thephoenixworks.com](mailto:cs@thephoenixworks.com) or our Data Protection Officer can be contacted at [privacy@thephoenixworks.com](mailto:privacy@thephoenixworks.com)
- Post: The Phoenix Works, Unit 59-62R Springfield Commercial Centre, Farsley, West Yorkshire, LS28 5LY

We are registered as a data controller at the UK Information Commissioner’s Office under number [Z3609883](https://ico.org.uk/organisations/data-controller-profile/23609883)

## 2. Our responsibilities

If you use any of our products or services, enquire about our services, interact with us via social media, email, call or write to us, or just visit our website, this Privacy Policy applies to you and we act as the ‘data controller’ of your personal data. This means we determine how and why your personal data is processed.

If you are a supplier or a member of staff (current team member, job applicant or previous team member) we have created specific policies for you, and they will have been made available to you at the appropriate point in time. The Phoenix Works is committed to ensuring the privacy and security of your personal data.

The following Privacy Policy sets out the personal data that we collect about you. This includes how and why we process your personal data, who we share it with, and lots of information about your rights and choices when it comes to the processing of your personal data.

We’ll keep this Privacy Policy updated to show you all the things we do with your personal data. In certain circumstances we may also provide an extra privacy notice, which will always refer to this page.

## 3. Your responsibilities

- ✓ To read this Privacy Policy
- ✓ If you are a customer of The Phoenix Works, please also check the terms and conditions and policies between us as they may contain further details on how we collect and process your data.

- ✓ If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information to us, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

#### **4. Use of any hyperlink and third-party views**

Neither we nor any of our affiliates are responsible for the content of any other website, including any website through which you may have gained access to this site or to which you may gain access from this site. We do not accept any liability in connection with any such websites or links.

Where we provide a hyperlink to a third party's website, we do so because we believe in good faith that such a website contains or may contain material which is relevant to that on our site. Such a hyperlink does not signify that we or our affiliates have reviewed or approve of the connected third party's website or its contents – indeed in certain instances a hyperlink may connect you to a third party's website containing views contradictory to those expressed on our site or otherwise held by us or our affiliates.

Any views or opinions of third parties are the personal views of the individuals or organisations that provided them and do not necessarily reflect the opinion or views of us or any of our affiliates.

Where possible we have provided you with a link to their privacy policy and their main business website. Please note that whilst we make every effort to keep these links up to date, there may be instances where the organisation has changed their website and the link may no longer work. If that is the case, then please find their main website and their privacy policy can usually be found linked in the footer at the bottom of the main webpage. Please also do not hesitate to alert us to this on our email address [privacy@thephoenixworks.com](mailto:privacy@thephoenixworks.com)

#### **5. Protecting your personal data**

The Phoenix Works team follow strict security procedures to protect your personal information. This includes following certain guidelines.

From time to time, our website, social media sites or documents may provide hypertext links to sites which are created by individuals and companies outside The Phoenix Works. We do this if the site is relevant to the topic you're reading about. Whilst we always try to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, or the accuracy or relevance of the content on them.

##### **Protecting your data on shared devices**

In order to ensure you are managing your data security as effectively as possible whilst using shared devices, the safest and most secure method is always to use a different user profile for each person using that device. This approach will ensure that all our account information, personal data, security settings, cookies and browser settings are kept separate.

If that is not possible or appropriate then it is important that whenever you have finished your browser session on any website then ensure that not only have you logged out of all your accounts, but also that you close down the browser completely before starting a new session by clicking the cross in the top right corner of the screen. You should also clear down the cookies at the end of your browsing session to ensure that your browser has 'forgotten' the information and cookies that have been provided within that browsing session.

Each browser handles cookies differently and as we don't know what browser you are using, we are not in a position to provide detailed guidance on this. However, please find below links for invalidating or deleting cookies from the most popular browsers.

- Google Chrome
- Internet Explorer (Win 10/8.1)
- Safari (Mobile Devices)
- Safari (Mac)
- Firefox

### **Fraudulent use of your data**

If you are concerned your personal details have been used fraudulently then please alert us immediately.

We would also like to share with you some steps that you may find useful if you find yourself in this situation.

#### **Seek immediate advice from your bank**

If you are concerned that your bank details may have been used fraudulently you should always speak to your bank to alert them so that they have the opportunity to protect you and your accounts.

#### **Securing your online accounts**

If you have reason to believe your email account may have been compromised, then change your password immediately.

Personal credentials such as your usernames and passwords, can be stolen directly from you by criminals using tricks such as phishing emails. They can also be stolen by hackers from the services you use, if they suffer a data breach. If you suspect either has happened, you should change your password as soon as possible.

If you have used the same password on any other accounts, you should change it there too.

#### **Reporting Incidents of Fraud or Identity theft**

If you are concerned that you have been defrauded or been the victim of a scam or you have experienced cyber-crime or identity theft, then you should always report it. Reports like yours will help the police in their fight against criminal activity.

#### **Report it to Action Fraud**

If you are concerned that you have been scammed, defrauded or experienced any type of cyber-crime you should report it to Action Fraud.

Run by the City of London Police, Action Fraud is the UK's national fraud and cyber-crime reporting centre. They are the UK's national reporting centre for fraud and cyber-crime where you should report fraud if you have been scammed, defrauded or experienced cyber-crime in England, Wales and Northern Ireland, they will ensure that your fraud reports reach the right place.

You can report fraud or cyber-crime using their online reporting service any time of the day or night. They will also provide help and advice over the phone.

When you report it to them you will receive a police crime reference number. Reports taken are passed to the National Fraud Intelligence Bureau. Action Fraud does not investigate the cases and cannot advise you on the progress of a case.

- Online: <https://www.actionfraud.police.uk/report-a-fraud-including-online-crime>
- Telephone: 0300 123 2040

### **Report it to 101 The Police non-emergency number**

101 is the number to call when you want to contact your local police in England, Wales, Scotland or Northern Ireland

Visit them online at <https://www.police.uk/contact/101/>

Please be aware that if you do report it to the Police on 101, they may also advise you to call Action Fraud

### **If your company data has been used fraudulently - speak with your IT Support Team**

Your organisations IT Support Team may be able to offer you a level of support in this space and should be able to help you secure your online accounts and wider systems, so we would advise reaching out to them and asking for support as soon as possible.

### **Other useful links**

- National Cyber Security Centre – advice for individuals and families  
<https://www.ncsc.gov.uk/section/information-for/individuals-families>
- Citizens Advice – advice on banking security and fraud  
<https://www.citizensadvice.org.uk/debt-and-money/banking/banking-security-and-fraud/>
- Get Safe Online <https://www.getsafeonline.org/>

## 6. When and how we collect your personal data

From the first moment you interact with The Phoenix Works, we are collecting data.

Sometimes you provide us with data, sometimes data about you is collected automatically and sometimes industry partners or other organisations such as installation directory websites will provide us with data about you.

Included below is a visual representation we've created that explains when and why we do this. Some of the interactions illustrated may happen multiple times within your journey with us (e.g. you receive communications from us, or you enquire about service) or in a different order, so each journey will be unique, but we hope this will allow you to develop and understand where there are touch points and interactions are between your data, our business and the wider energy industry.



## 7. Types of data that we collect

‘Personal data’, or ‘personal information’, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

	<p><b>Contact details and data that identifies you</b> Your name, contact address, installation address, telephone number, email address, title.</p>
	<p><b>Financial &amp; transaction information</b> Purchase and account history relating to the products and services which you have purchased or used, deliveries we have made to you. Information that allows us to understand your creditworthiness and financial position. Please note we do not store any data that allows card payments to be made – this data is handled by our secure third party Barclaycard who are PCIDSS compliant.</p>
	<p><b>Your account information</b> Unique account number, contract details, household details, property type, marketing preferences, incident details, dispatch appointment details, and notes added to your account.</p>
	<p><b>Our communication with you</b> Records of your discussions with our Customer Services Team and other staff members, including call recordings and emails. When you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes when you send us emails, phone our Customer Service Team or contact us through social media including Twitter, Facebook, Instagram, and LinkedIn. Exercising your rights: if you exercise any of your statutory rights under data protection law, we will also keep a record of this and how we respond.</p>
	<p><b>Data about your energy equipment, usage and property details</b> Meter details, solar photovoltaic details, electric vehicle charge points, property details, energy use, energy consumption level and pattern, energy generation, ancillary energy products (e.g. home battery). Photos and images of your property collected by our team during the solution survey and installation process. Photos or other images of your property you share with us or are provided to us by a third party e.g. Industry partners as part of the quotation or maintenance process.</p>
	<p><b>Technical data that identifies you</b> Your IP address, login information, device type, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.</p>
	<p><b>Data on how you use The Phoenix Works services</b> Information about how you use our website, products and services. Your URL clickstreams (the path you take through our websites), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions. Responses to surveys, competitions and promotions, including records of any surveys you respond to or your entry into any competitions we run.</p>
	<p><b>Sensitive data</b> If you feel that either yourself a member of your household are in a vulnerable situation and needs extra care (for example due to age, the presence of young children, health or</p>

	<p>medical conditions, disability or financial circumstances), we will collect the information you share with us so that we can manage your installation appropriately. Information passed to us by the Police, Crime Stoppers or Action Fraud.</p>
	<p><b>Other types of data</b>          We also use aggregated data, to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity. Any other information that you provide us with as part of your enquiry, quotation and installation process.</p>
	<p><b>Enquiries or complaints</b>          We will obtain or request the following information if you contact us with an enquiry or complaint.</p> <ul style="list-style-type: none"> <li>• Any information that you disclose to us as part of your enquiry or complaint.</li> <li>• All the personal data which is necessary for us to deal with your enquiry, question, or complaint, which will depend on the nature of your request.</li> </ul>
	<p><b>Children's data</b>          The Phoenix Works is a business-to-consumer and business-to-business service directed to and intended for use only by those who manage a home or business premises. We do not target at children, and we do not knowingly collect any personal data from or about children.</p>

## 8. How and why we use your data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

### To provide you with products & services and fulfil our contractual agreement with you

We process your personal data where is necessary for a contract that you have with us, or because we have asked you to take specific steps before entering into that contract.

Reason or purpose	Personal data used includes
Where requested by you we will provide you with a quotation for any of our products and services	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Account information and details of other people linked to your account</li> <li>Data about your energy equipment, usage, and property details</li> </ul>
To deliver our products and services to you	All personal information we collect as listed in Section 7
To collect payments for products and services, debt collection, manage your payment plans	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Account information and details of other people linked to your account</li> <li>Financial &amp; transaction information</li> <li>Data about your energy equipment, usage and property details</li> <li>Purchase and account history</li> <li>Location information</li> <li>Technical data</li> </ul>
To deliver our service communications to you (such as annual servicing and maintenance reporting)	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Financial &amp; transaction information</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>
To manage and answer your complaints or questions. This includes communication media such as email, telephone and social media.	All the personal data which is necessary for us to deal with your enquiry, question or complaint, which will depend on the nature of your request and your contact preferences
Showing you information about your energy consumption and generation	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Your account information and details of other people linked to your account</li> <li>Data about your energy equipment, usage and property details</li> </ul>
Providing industry flows and managing the forecasting and calculation of energy generation	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> </ul>

and consumption data to ensure we provide the correct solution to meet your requirements

- Your account information and details of other people linked to your account
- Data about your energy equipment, usage and property details

**To comply with our legal obligations** (and for the establishment, exercise or defence of legal claims)

We process your personal data because we need to comply with a legal or regulatory obligation, including:

Reason or purpose	Personal data used includes
Competent persons scheme e.g. NICEIC to register installations with building control	<ul style="list-style-type: none"> <li>• Your contact details and detail of work carried out</li> </ul>
Attending to and handling emergency situations (including major electrical fault)	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Sensitive data</li> <li>• Data about your energy usage or generation</li> </ul>
To resolve any disputes relating to your service usage with us	All the personal data which is necessary for us to deal with the dispute, which will depend on the nature of the dispute
For the detection and prevention of crime, including any investigations into potentially fraudulent activity, such as energy theft. These requests may be coming from the Police or other government bodies/agencies. Please note that we may restrict the amount of information passed to the police or other governmental agencies if we feel the request is unnecessary or the data being asked for is disproportionate	The personal data which is necessary for us or the agencies to investigate the issue, which will depend on the nature of the problem. At a minimum, this will include your name and contact information and information about your account and transaction history.
To secure and protect our data processing network and infrastructure	All personal information we collect as listed in Section 7
Internal and statutory audits	All personal information we collect as listed in Section 7

**Because it is in our legitimate interests as a business to use your information:**

We'll use your personal information if we consider it necessary for our legitimate business interests, or the legitimate interests of a third party, so that we can operate as an efficient and effective business and a responsible sustainable energy solutions provider. This is subject to ensuring that those interests are not outweighed by your own rights and interests in relation to the relevant personal data and to that end where we wish to use legitimate interest, we will carry out legitimate interest impact assessment for each of these.

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

Reason or purpose	Personal data used includes
<p>To maintain, develop and improve The Phoenix Works products and services e.g. for quality assurance purposes, to optimise our business processes and procedures, to support efficient business operations and the management and training of our staff, to analyse performance of webpages and provide you with relevant content</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Purchase and account history</li> <li>• Lifestyle and demographic insight information</li> <li>• How you use our online applications and websites</li> <li>• Location information</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Advertising and direct marketing preferences and responses</li> <li>• Technical data</li> </ul>
<p>Identify, and let you know about The Phoenix Works products and services that may interest you e.g. to understand your existing sustainable energy solution set up and provide details of complimentary products or services This is only done to support our primary business objectives of the provision of renewable energy solutions and services</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your Account information and details of other people linked to your account</li> <li>• Purchase and account history</li> <li>• Advertising and direct marketing preferences and responses</li> <li>• Technical data</li> </ul>
<p>Develop new products and services e.g. new renewable energy solutions and technology, new website or online functionality</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information</li> <li>• Purchase and account history</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Technical data</li> </ul>
<p>Management information reporting. This includes the creation of aggregated and anonymised information for further use It is important to be clear that for the use of Management Information, personal data is not accessed in its raw format directly by management. Our MI team create aggregated data which forms the bulk of such reporting ensuring that the data is not granular enough to identify individuals</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Technical data</li> </ul>

For market research purposes, to help us continually improve our offering to our customers	All personal information we collect as listed in Section 7
To provide you with advice, guidance and information on green energy solutions or tariffs that are appropriate to your circumstances	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Your account information and details of other people linked to your account</li> <li>Financial &amp; transaction information</li> <li>Purchase and account history</li> <li>Lifestyle and demographic insight information</li> <li>Data about your energy equipment, usage, generation and property details</li> <li>Sensitive information</li> <li>Advertising and direct marketing preferences</li> <li>and responses</li> </ul>
<p>Direct Marketing.</p> <p>If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to by law.</p> <p>However, we will never send you direct marketing materials where you have opted out of receiving direct marketing communications</p>	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Your account information and details of other people linked to your account</li> <li>How you use our online applications and websites</li> <li>Advertising and direct marketing preferences and responses</li> </ul>
Protection of our staff	All personal information we collect as listed in Section 7
Staff training	All personal information we collect as listed in Section 7
For the establishment, exercise or defence of legal Claims	All personal information we collect as listed in Section 7
Debt recovery	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> <li>Account information and details of other people linked to your account</li> <li>Financial information</li> <li>Transaction and payment information</li> <li>Delivery information</li> <li>Purchase and account history</li> </ul>

**Where we have your consent:**

This means that you have given clear consent for us to process your personal data for a specific purpose.

You can change your mind! If you have previously given us consent to process your data for a specific purpose you can freely withdraw such consent at any time. You can do this by emailing us at [privacy@thephoenixworks.com](mailto:privacy@thephoenixworks.com) or unsubscribing where appropriate.

If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights.

Please note, where you update your consent directly with us, we will process this as soon as possible but this change may take up to 30 days to take effect.

Reason or purpose	Personal data used includes
Direct Marketing - To provide you with information about products and services that we think you would benefit from in accordance with your marketing preferences	<ul style="list-style-type: none"> <li>Your contact details</li> <li>Direct Marketing preferences</li> </ul>
Finance solutions – In our role as an introducer of Phoenix Financial Consultants to arrange a loan from its panel of lenders for up to 100% of the cost of your solar PV or battery storage system	<ul style="list-style-type: none"> <li>Your contact details</li> <li>Location information</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>

**Where we need to protect your or someone else’s vital interests:**

Reason or purpose	Personal data used includes
Where we have reason to believe that someone is at imminent risk of harm. In these circumstances we may alert third parties such as the Police or Social Services to check everyone’s safety.	All the personal data which is necessary for us to deal with the concerns, this will depend on the nature of the concerns

**Where we process your personal data so you cannot be identified any more**

We may anonymise and aggregate any of the personal data we hold (so that you can no longer be identified by it).

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.

## 9. Sources we collect your data from

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by the industry partners. This means that we will collect personal data from several sources. These include:

Source	Further information on what we collect
Directly from you	When you enquire about our services, become a customer of The Phoenix Works, purchase products or services from us, submit information via our websites, provide us with meter readings, complete forms we provide to you, enter our competitions and promotions, make a complaint, exercise your statutory rights, contact us by phone, email or communicate with us in any way such as via social media.
Price Comparison Websites (PCW) and third-party sellers	Your personal data can be passed onto us from price comparison websites and related third-party sellers should you choose to interact with them to generate a quote. This includes organisations such as Rightcharge and GoCharged.
Other companies' apps and products	They provide us with information if you connect them to our products or services. An example of this would be social media platforms.
Our website and other online or mobile applications	We collect information about how you use them and any smart devices you connect to them.
Smart devices such as smart meters, solar panels and other devices that we provide to you or that you connect to your account such as IoT devices	We collect information about how you use them, your energy consumption and the health of the equipment.
Other companies we work with	The companies provide us with information to help us deliver our products and services to you. These include: <ul style="list-style-type: none"> <li>• Network operators and distributors: to connect your meter to the energy network.</li> <li>• Meter installation booking companies</li> <li>• Debt collection agencies</li> <li>• Price comparison websites and other lead generation providers</li> <li>• Businesses providing, managing and monitoring our IT infrastructure</li> <li>• Companies in the same group of companies as us: who may provide relevant information about the products and services bought from them.</li> <li>• Industry partners who we carry out installations for</li> <li>• Bodies who require specific permissions e.g. planning permission or permit to work</li> </ul>
Credit, anti-fraud agencies and the Police or other law enforcement agencies	They provide us with information about your financial, transaction and credit history and any information required to investigate cases of criminal activity of fraud, this will depend on the nature of the case or investigation

The Government, Ombudsman Services, Regulators and Citizens Advice:	These governmental or quasi-governmental organisations provide information to us for various purposes, including in relation to complaints they have received, to help us deliver services to you and to enable you to exercise your rights under various other laws and regulations.
Public registers	These registers, such as the Land Registry, provide us with information about your property
Private registers	These registers, such as Google Maps, Google StreetView, Zoopla, provide us with information about your property
Third parties approved by you	You may authorise them to make requests on your behalf.
Mailing and delivery companies	For print and mail fulfilment or to deliver products to you

## 10. Third parties who process your data

The Phoenix Works utilise industry partners where an essential element of the solution we are providing cannot be facilitated with in house operatives. We also use third parties to help us host our infrastructure and applications, communicate with customers, power our emails etc as we believe they are the best in their field at what they do.

We pass your information to a very limited number of third parties for the following reasons:

- To deliver the services you have requested from us, which might include giving information to members of your family, household, or other people who have an interest in the property, for instance, landlords or letting agents.
- To deliver services that we have a legal obligation to provide to you.
- For legal or regulatory purposes including the detection of crime and fraud prevention.
- If we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy.

Here are the details of some of our key third-party service providers, and what data they collect or we share with them, where they store the data and the purpose for which they need it.

### Industry service providers

We collect or share your data with various categories of third-party agencies. This is an essential element of the works we carry out to ensure all permissions, grants and applications are carried out.

Service Provider	Data collected or shared	Purpose	Useful links
Independent connection providers	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Data about your account</li> <li>• Data that identifies you</li> <li>• Data about your energy equipment, usage, generation and property details</li> </ul>	To facilitate new connections and upgrades to existing connections	
Other energy companies, network companies and industry bodies	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Data about your account</li> <li>• Data that identifies you</li> </ul>	To comply with rules and regulations set by Ofgem; as part of industry initiatives; the Theft Risk Assessment Service; or to help make it easier for you to switch suppliers in line with industry guidelines.	
Microgeneration certification scheme	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Data that identifies you</li> <li>• Data about your energy equipment, usage, generation and property details</li> </ul>	Compliance with building control regulations and proof of competency	<a href="#">Privacy Policy</a> <a href="#">Website</a>

NICEIC	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data that identifies you</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	Compliance with building control regulations and proof of competency	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Distribution network operator	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data that identifies you</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	To comply with rules and regulations set by the energy networks association.	<a href="#">Privacy Policy</a> <a href="#">Website</a>

### Financial services including payment partners, debt collection, credit checking & fraud

Service Provider	Data collected or shared	Purpose	Useful links
Barclaycard	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Financial information</li> <li>Financial &amp; transaction information</li> </ul>	Secure payment collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Elavon	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Financial &amp; transaction information</li> </ul>	Payment collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Stripe	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Financial information</li> </ul> Financial & transaction information	Secure payment collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>

### Organisational Management & Infrastructure

Key companies that help us run our business and support our IT & Technology infrastructure

Service Provider	Data collected or shared	Purpose	Useful links
Microsoft Azure	All personal information we collect as listed in Section 7	The platform on which we build, manage and deploy online applications	<a href="#">Privacy Policy</a>
Microsoft Office365	All personal information we collect as listed in Section 7	The provision of our office applications for document creation, management and email communication	<a href="#">Privacy Policy</a>
Jumpstech	All personal information we collect as listed in Section 7	Workflow management tool for installation teams	<a href="#">Privacy Policy</a>
Our parent company			

## Analytics

Service Provider	Data collected or shared	Purpose	Useful link
Google Analytics	<ul style="list-style-type: none"> <li>• How you use The Phoenix Works</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	Google Analytics is a web analytics service: we use it to track your use of our online services, prepare reports on user activity and help us ensure our content is accessible on different platforms and devices. We are not able to identify you from our Google Analytics data	<a href="#">Privacy policy</a>
Third parties commissioned to do specific analysis	All information required to undertake the analysis.		

## Integrations (including those by your request) & social media

Service Provider	Data collected or shared	Purpose	Useful links
Google	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• How you use The Phoenix Works</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	This enables you to authenticate via Google and connect with Google services such as location mapping	<a href="#">Privacy policy</a>
Facebook	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	This enables you to authenticate via Facebook and interact with us via Facebook pages or messaging	<a href="#">Privacy Policy</a>
NPS scoring	<ul style="list-style-type: none"> <li>• Contact details if provided by customer</li> </ul>	To enable customers to share feedback of their solutions provided by The Phoenix Works so we can make improvements to our ways of working	<a href="#">Privacy Policy</a>
Free index	<ul style="list-style-type: none"> <li>• Location</li> <li>• Date of installation</li> <li>• Contact details if provided by customer</li> </ul>	To enable customers to share their feedback of their solutions provided by The Phoenix Works so we can make improvements to our ways of working	<a href="#">Privacy Policy</a>
Which	<ul style="list-style-type: none"> <li>• Location</li> </ul>	To enable customers to share their feedback of their solutions provided by	<a href="#">Privacy Policy</a>

	<ul style="list-style-type: none"> <li>• Date of installation</li> <li>• Contact details if provided by customer</li> </ul>	The Phoenix Works so we can make improvements to our ways of working	
Twitter	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	This enables you to interact with us via the Twitter platform	<a href="#">Privacy policy</a>
Linked In	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	This enables you to interact with us via the LinkedIn platform	<a href="#">Privacy Policy</a>
Instagram	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Various other personal data as set out in their privacy policy</li> <li>• Cookies</li> </ul>	This enables you to interact with us via the Instagram platform	<a href="#">Privacy Policy</a>

## Communications

Service Provider	Data collected or shared	Purpose	Useful links
Mailchimp	<ul style="list-style-type: none"> <li>• Email address</li> <li>• How you use The Phoenix Works</li> <li>• Data that identifies you</li> <li>• Technical data</li> <li>• Our communication with you</li> </ul>	For sending, storing and tracking emails	<a href="#">Privacy Policy</a>
UKMail	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Our communication with you</li> </ul>	For sending postal mail	<a href="#">Privacy Policy</a>
EV Assist	<ul style="list-style-type: none"> <li>• Contact details</li> </ul>	To provide 24/7 driver support for customers using our EV charger installations	

## Industry Partners

Service Provider	Data collected or shared	Purpose	Useful links
Fortum	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Financial information</li> <li>• Our communication with you</li> <li>• Details of other people linked to your account</li> </ul>	Provider of software platform for managing EV chargers.	<a href="#">Privacy Policy</a>

## 11. How we use cookies

We use cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies are anonymous, so they don't store any personal information of any kind.

Unless you adjust your browser settings to refuse cookies, we (and our third parties) will issue cookies when you use our website to distinguish you from other users of our website. These may be 'session' cookies, meaning they delete themselves when you leave The Phoenix Works website, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide you with a tailored service. This helps us to provide you with a brilliant experience when you browse our site and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

### We use the following cookies:

**Necessary cookies** — we need these for our site to operate. These cookies, for example, enable you to obtain a quote or to log into secure areas of our site.

**Performance cookies** — these help us to improve the way our site works by analysing how people move about our site enabling us to help you to find things more easily.

**Functionality cookies** — let us greet you by name and provide you with a more personalised service.

**Targeting cookies** — record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please note that where third parties use cookies we have no control over how those third parties use those cookies, and you should check their cookie policies for further details.

### How can I block cookies?

If you don't want us to use cookies in your web browser, you can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can also delete cookies through your browser settings.

However, please remember that some parts of our website require cookies to function properly and if you use your browser settings to disable, reject, or block cookies (including essential cookies), you

may not be able to access all or parts of our website. More information about cookies including what they are and how to block or delete them can be found at [www.aboutcookies.org](http://www.aboutcookies.org)

## 12. Your privacy choices and rights

### Your Choices

	<p><b>You can choose not to provide us with your personal data</b></p> <p>If you do choose to do this, you can continue to use the website and browse its pages or interact with us on social media but we will not be able to provide you our services or process transactions without personal data.</p>
	<p><b>You can turn off cookies in your browser by changing its settings</b></p> <p>You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and browse its pages.</p>
	<p><b>You can ask us not to use your data for marketing</b></p> <p>We will inform you (before collecting your data) if we intend to use your data for marketing and if any third parties are involved. You can opt out from marketing by managing your settings by contacting us:</p> <p>Telephone: 0113 815 5366</p> <p>Email: <a href="mailto:cs@thephoenixworks.com">cs@thephoenixworks.com</a> or <a href="mailto:privacy@thephoenixworks.com">privacy@thephoenixworks.com</a></p> <p>Post: Unit 59-62R - Springfield Commercial Centre, Farsley, West Yorkshire, LS28 5LY</p>

### Your Rights

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

	<p><b>You have the right to access information we hold about you</b></p> <p>This includes the right for us to provide you with on supplementary information about:</p> <ul style="list-style-type: none"> <li>• the categories of data we're processing</li> <li>• the purposes of data processing</li> <li>• the third parties or categories of third parties to whom the data may be disclosed</li> <li>• how long the data will be stored (or the criteria used to determine that period)</li> <li>• your other rights regarding our use of your data all of which is covered in this policy.</li> </ul> <p>We will provide you with the information within one month of your request, unless one of the following exemptions applies:</p> <ul style="list-style-type: none"> <li>• Doing so would adversely affect the rights and freedoms of others (e.g. another person's confidentiality or intellectual property rights) or the law allows us to extend this period of time. We'll tell you if we can't meet your request for such reasons.</li> </ul> <p>Some or all of the personal data is exempt from such requests in a particular circumstance. If this exemption applies, we will tell you this when responding to</p>
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	<p>your request. Should you wish to exercise this right, please contact us with a description of the information you would like to see.</p>
	<p><b>You have the right to make us correct any inaccurate personal data about you</b>          You have the right to ensure that any information we hold about you is accurate and kept up to date.</p>
	<p><b>You can object to us using your data for profiling you or making automated decisions about you</b>          We may use your data to determine whether we should let you know information that might be relevant to you (for example, tailoring emails to you based on your energy generation, consumption or location).          Otherwise, the only circumstances in which we will do this is to provide The Phoenix Works services to you.          You have the right not to be subject to any decisions made based solely on automated processing, including profiling, which produces legal effects or significantly affects you. Where such decisions are made, you have the right to:</p> <ul style="list-style-type: none"> <li>• Obtain human intervention</li> <li>• Express your point of view</li> <li>• Obtain an explanation of the decision and challenge it</li> </ul>
	<p><b>You have the right to export your data to another service</b>          We will give you a copy of all the personal data applicable to this right in CSV or JSON format so that you can access it and / or provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.</p>
	<p><b>You have the right to be 'forgotten' by us</b>          You can ask us to delete your personal information in certain circumstances. You can do this by asking us to erase any personal data that we hold about you, if it is no longer necessary for us to hold that data for any of the purposes set out in this Privacy Policy that still apply to you relating to the provision of The Phoenix Works products or services.          The right to erase your personal data is can be made on the following grounds:</p> <ul style="list-style-type: none"> <li>• Your personal data is no longer necessary in relation to the purpose for which it was collected or processed</li> <li>• If the processing is based on consent, you choose to withdraw your consent and there is no other legal ground for processing</li> <li>• You object to processing, and there are no overriding legitimate grounds to continue the processing</li> <li>• Your personal data has been processed unlawfully</li> <li>• Your personal data must be erased for compliance with a legal obligation</li> </ul>
	<p><b>Restrict processing</b>          You have the right to request the restriction of processing of your personal data under specific conditions, unless we have a lawful reason to continue, such as for the establishment, exercise or defence of legal claims.</p>
	<p><b>Object to processing</b>          You have the right to object to processing which is based on:</p> <ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Tasks carried out in the public interest</li> <li>• Direct marketing</li> </ul>



**You have the right to lodge a complaint regarding our use of your data**

We would ask that if you do wish to do this that you please tell us first so that we have a chance to address your concerns.

If we fail in this, you can address any complaint to the UK Information Commissioner's Office, either by calling their helpline or as directed on their website at [www.ico.org.uk](http://www.ico.org.uk).

We'll always endeavour to respond to all requests within one month as per the requirements of the data protection legislation. If your request is complex or if you make lots of requests, the law allows us to extend our time to respond – if this is the case, we'll let you know.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may charge a reasonable fee taking into account the administrative costs of providing the information or refuse to provide the information.

Where we refuse a request, we will explain our reasons for the refusal, and remind you of your right to complain.

**How to exercise your rights**

You can contact The Phoenix Works data protection officer by writing to:

The Data Protection Officer

The Phoenix Works, Unit 59-62R - Springfield Commercial Centre, Farsley, West Yorkshire, LS28 5LY

You can also contact our data protection officer via email at [privacy@thephoenixworks.com](mailto:privacy@thephoenixworks.com)

## 13. How long do we store your data?

We will only store your personal data for as long as is necessary to fulfil the purposes outlined in this Privacy Policy or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights.

This means that your data will be retained in line with statutory and regulatory requirements.

As a paper free organisation, we do not routinely store copies of documents we receive. These are handled appropriately and then securely destroyed through our confidential waste system.

The criteria used to determine these retention periods includes:

- To comply with the minimum regulatory retention requirements as set by MCS, NICEIC
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- Where our retention periods are not governed by legislation, our retention policy is based on commercial justifications, which have been set in accordance with the principle of retaining personal data for no longer than is necessary for the purposes for which it is processed. These include:
  - To demonstrate compliance with our Supplier Licence Conditions
  - To enable us to provide you with our products and services
  - To allow us to resolve any disputes or complaints

- For the detection and prevention of fraud

## **14. Information Security**

The Phoenix Works have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with.

This includes robust security mechanisms, business continuity and resilience plans and ongoing testing of these measures.

We update and test our physical, logical and procedural security controls on an ongoing basis. These include limiting access to your personal data to those who need it and training our employees about the importance of maintaining the privacy and security of your personal data.

## **15. Making this Privacy Policy great**

Well done for getting to the bottom of this Privacy Policy! We are conscious that there is a lot of information here and we will be working over the coming months to continue ensuring that this Privacy Policy is as clear and simple as possible.

We have designed it to be as transparent, useful and engaging as possible and we would love to hear your feedback on how we can make it even better.

This is a dynamic document that will change regularly so please don't make this the last time you read it as we will post any changes on this page – any significant changes will, of course, be notified to you by email.

Most recent update: November 2020