

How we use your data

Privacy Notice (Version 1.0)

This privacy notice (**Privacy Notice**) provides information on how Sero Technologies Limited collects and processes your personal data when you download the Sero Life Application (**App**) and receive energy management services (**Energy Management Services**) from us.

It is important you read this Privacy Notice together with our website privacy policy (**Privacy Policy**) which contains more detail about our data processing and can be accessed [here](#).

Sero Technologies Limited is made up of different legal entities including:

Sero Technologies, Sero Life, Sero Homes.

When we mention “we”, “us”, “our” or “Sero”, we are referring to the relevant company in the Sero Group responsible for processing your data which will be clear to you when you use our services. Sero Technologies Limited is the controller responsible for the collection of personal data through the App and when providing Energy Management Services.

This Privacy Notice contains important information on who we are and how and why we collect, store, use and share your personal data which is any information relating to an identified or identifiable individual. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

If you have any questions about this Privacy Notice or our data protection practices, please contact us on hello@sero.life or on 029 2000 2882

1. Personal data we collect about you

We may collect and use the following personal data about you when you use the App or receive the Energy Management Services from us:

Identity data. Including your name, date of birth and national insurance number;

Contact data. Including your supply address, billing address email address and telephone number;

Account data. Includes your username and password for your account with us, your account preferences and your account number;

Financial data. Including your billing information, transaction and payment card information;

Credit data. Including information to enable us to undertake credit or other financial checks on you and information about your credit history;

Energy Metering data collected by Sero allows us to monitor your energy usage by generation source, allowing us to better learn how to balance your energy as well as ensure you get accurate bills. Energy data is linked to your Meter Point Administration Number (MPAN) and will be sent to Sero automatically. The breakdown of energy data is:

- Unregulated electricity usage
- Regulated electricity usage
- Energy usage for heating & hot water
- Solar generation and storage

Environmental data collected by Sero allows us to control and balance the energy in your home to match your ideal schedule as specified in the Sero app. The breakdown of environmental data is:

- Temperature data per zone
- CO2 & Humidity data

Usage data. Information about how you use our App, IT, communication and other systems.

Marketing data. Including your preferences in receiving marketing from us and our third parties and your communication preferences.

Aggregated data. 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.

Special category data. We may, in certain circumstances, with your consent, collect special category personal data about you, relating to your welfare requirements. This personal data may include data concerning your health. We will use this personal data in the following ways:

- to manage your welfare requirements and to mitigate any stopped or interrupted supply (where possible) and to allow us to react to an emergency situation whereby your energy supply is interrupted or stopped;
- manage our staff and contractors who are responsible for providing our services to you; and
- provide the Energy Management Services and any materials, literature or other documentation to you in the most appropriate way (which may include in large print or braille communication).

We may also share this special category data with the following organisations:

- relevant metering agents, network operators and the energy supplier for the purpose of them providing relevant metering services and supplying energy;
- other relevant organisations including local authorities or emergency responders who may be able to provide support with your welfare requirements.

Your personal data is required for the reasons set out in the table below which includes making the App available to you, and to provide the Energy Management Services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing the Energy Management Services or making the App available to you.

2. How your personal data is collected

We collect most of the personal data directly from you— through the App and through the metering collection points installed in your home. We may also collect personal data directly from you when you request Energy Management Services or contact us.

We may also collect information:

- directly from a third party (which is explored in more detail below);
- via our IT systems including automated monitoring of our App and other technical systems, such as our computer networks and connections and communication systems.

3. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, including:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you to provide Energy Management Services and/or make the App available to you, or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so.

What we use your personal data for

Type of personal data

Lawful basis for processing including basis of any legitimate interest

To register you as a new customer of Energy Management Services and to set you up as a user of the App.

- Identity data
- Contact data
- Financial data
- Credit data
- Special category data (*where applicable*)

For the performance of our contract with you or to take steps at your request before entering into a contract.

We will rely on your consent to process special category data if you notify us of welfare requirements.

To deliver the Energy Management Services including managing payments and collecting money owed to us.

- Identity data
- Contact data
- Financial data
- Account data
- Energy usage data

Performance of a contract with you
Necessary for our legitimate interests
(*to recover debts due to us*)

Credit reference checks via external credit reference agencies.

- Identity data
- Contact data
- Credit data

For our legitimate interests or those of a third party including the energy service provider who will supply the energy to you, to ensure our customers are likely to be able to pay for their energy usage and our Energy Management Services.

What we use your personal data for	Type of personal data	Lawful basis for processing including basis of any legitimate interest
To manage our relationship with you including notifying you of changes to the App or to the Energy Management Services	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data 	Performance of a contract with you Necessary to comply with our legal obligations <i>(to inform you of any changes to our terms and conditions)</i>
To make personal projections about the amount of energy you are likely to use, and make decisions about forecasting your energy usage	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data • Special category data <i>(where applicable)</i> 	Performance of a contract with you for providing Energy Management Services Necessary for our legitimate interests <i>(to ensure our energy forecasting is as accurate as possible)</i> We will rely on your consent to process special category data if you notify us of welfare requirements
To monitor trends in energy usage so we can improve the Energy Management Services	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data • Usage data 	Necessary for our legitimate interests <i>(to develop our products/ services and grow our business and to ensure our energy forecasting is as accurate as possible).</i>
To enable us to work out your energy bills	<ul style="list-style-type: none"> • Identity data • Account data • Energy usage data 	Necessary for performance of a contract with you Necessary for our legitimate interest <i>(to settle your account and to recover any debts due to us)</i>
To prevent and detect fraud against you or energy theft	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data 	For our legitimate interests or those of a third party, to minimise fraud that could be damaging for us and for you
Transfer your personal data to another energy supplier if you no longer wish to use us, or the energy supplier providing energy to your property	<ul style="list-style-type: none"> • Identity data • Contact data • Financial data • Account data • Energy usage data • Special category data 	For our legitimate interests in assisting in swapping over energy providers and facilitating your request to transfer provider We will rely on your consent to process special category data if you notify us of welfare requirements
Information we collect to comply with law, regulations, industry codes and government instructions, and deal with complaints this includes reporting to regulatory bodies and investigating and responding to any complaints about the services we provide	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data 	Necessary for us to comply with our legal and regulatory obligations For our legitimate interests in resolving complaints we receive
Marketing our services to: - existing and former customers; - third parties who have previously expressed an interest in our services.	<ul style="list-style-type: none"> • Identity data • Contact data • Account data • Energy usage data • Marketing data 	For our legitimate interests <i>(to promote our business to existing and former customers and to develop our services and grow our business).</i>

3. Automated decision making

We may use automated decision making to carry out credit vetting to decide whether we can provide our Energy Management Services to you based on a credit check. We will consider:

- the information you provide when you request Energy Management Services;
- information we receive from credit reference agencies;
- information from fraud prevention agencies (if appropriate).

A decision will be made automatically, depending on the outcome of the credit check, whether we are able to provide Energy Management Services to you. This will be based on your credit worthiness.

If this personal data is not provided, or you notify us that you do not agree to us using automated decision making to carry out the credit check, we may not be able to provide Energy Management Services to you.

4. Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about our Energy Management Services.

We have a legitimate interest in processing your personal data for promotional purposes (see above '**How and why we use your personal data**').

This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us on the contact details provided above;
- using the 'unsubscribe' link in marketing emails you received from us.

5. Who we share your personal data with

We routinely share personal data with:

- companies within the Sero group;
- third parties we use to help deliver our Energy Management Services to you;

- other energy suppliers if you chose to leave us, or wish to switch your energy supply from the current energy supplier – if you chose to use another energy supplier, we may share your personal data with other suppliers to assist in the switching process;
- credit reference agencies – where it becomes necessary to credit check you;
- law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations, this may include Ofgem;
- fraud prevention agencies to help us identify any fraud and energy theft – details of your account may need to be shared with these fraud prevention agencies to help identify any such fraud or energy theft;
- network operators such as the National Grid;
- HM Revenue & Customers and our professional advisers which include lawyers, bankers, auditors and insurers who provide tax, banking, legal, insurance and accounting services.

We will share your personal data with third parties we use to help deliver our Energy Management Services to you. Only aggregated data will be shared in an anonymised format. This aggregated data is derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity to third parties. However, if at any time we combine or connect this 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 Notice.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

Law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share your personal data to third parties to whom we may choose to sell, transfer or merge parts of our business or assets. 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, but only in the same way as set out in this Privacy Notice.

6. How long your personal data will be kept

We will keep your personal data while you are receiving Energy Management Services or you are using the App. Thereafter, we will keep your personal data for as long as is necessary for us to comply with applicable laws and to establish, exercise or defend our legal rights.

How long we need to keep your personal data will depend on whether you still have an active account for Energy Management Services or have any outstanding debt against your account.

See table 6.1 on next page.

We will not retain your personal data for longer than necessary for the purposes set out in this Privacy Notice. When it is no longer necessary to retain your personal data, we will delete or anonymise it. We will anonymise your personal data (we will not be able to associate the personal data with you) if we need to use the data for research or statistical purposes. This may include to improve our Energy Management Services and analyse trends in energy usage for forecasting purposes. We may use anonymised data indefinitely without further notice to you.

In some circumstances, you can ask us to delete your personal data: see 'your legal rights' in the Privacy Policy for further information.

7. Transferring your personal data out of the UK and EEA

We do not transfer the personal data collected when providing Energy Management Services, and/or making the App available to you, outside of the European Economic Area (EEA), except when we share your personal data when using Google Analytics and Microsoft SharePoint. This involves transferring your data outside the EEA.

Whenever we transfer your personal data out of the EEA for these purposes, we ensure a similar degree of protection is afforded to it by ensuring safeguards are implemented.

8. Your rights

Under certain circumstances, you have the rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). You can find more detail about your rights in our Privacy Policy.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the **Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation**.

9. How to contact us and changes to this Privacy Notice

This Privacy Notice was published on 21 August 2020.

Please contact us by email or telephone if you have any questions about this Privacy Notice or the personal data we hold about you.

Table: 6.1 How long we keep your personal data

Type of personal data	Retention period
Identity data	6 years from the date you cease to use the App
Contact data	6 years from the date you cease to use the App
Account data	6 years from the date you cease to use the App
Financial data	For as long as you receive the Energy Management Services
Credit data	For as long as you receive the Energy Management Services
Energy metering data	For as long as you receive Energy Management Services, and in an anonymised format thereafter
Usage data	For as long as you use the App
Marketing data	For as long as you receive Energy Management Services
Special category data	For as long as you receive Energy Management Services

