

Data Protection Policy

Introduction

EPG Energy Ltd needs to hold and process certain information about its employees to allow it to:

- Recruit and pay staff.
- Monitor performance, achievements and health & safety.
- Meet legal obligations and government requirements, such as tax via HMRC.

EPG Energy needs to hold certain information about its customers to allow it to:

- Provide and perform its contractual duties to the customer.
- Generate proposals to potential customers.
- Ensure Electricity Industry Governance may be complied with.
- Meet legal obligations and government requirements such as tax via HMRC.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this EPG Energy must comply with the General Data Protection Regulations (GDPR). In summary these state that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against

accidental loss, destruction or damage, using appropriate technical or organisational measures.

EPG Energy staff who process or use any personal information must ensure that they follow these principles at all times. In order to ensure that this happens, EPG Energy has developed this Data Protection Policy.

Status of the Policy

This policy does not form part of the formal contract of employment, but it is a condition of employment that employees will abide by the rules and policies made EPG Energy from time to time. Any failures to follow the policy can therefore result in disciplinary proceedings.

Any member of staff, who considers that the policy has not been followed in respect of personal data about themselves, should initially raise the matter with their line manager. If the matter is not resolved it may then be raised as a formal grievance and processed via EPG Energy's internal grievance procedure.

Any member of staff, who considers that the policy has not been followed in respect of personal data about customers, should initially raise the matter with their line manager or the Data Protection Officer.

Notification of Data Held and Processed

All staff and customers are entitled to:

- Know what information EPG Energy holds and processes about them and why;
- Know how to gain access to it;
- Know how to ensure it is kept up to date;
- Know what EPG Energy is doing to comply with its obligations under GDPR;
- Know they have the right to withdraw data use permission;
- Know they have the right to data deletion;
- Know they have 'the right to forget' where EPG Energy must remove all data from all systems except:
 - where required to be kept by law (i.e. tax invoices) and;
 - where minimal data is maintained on a 'Do Not Contact List'.

Responsibilities of Staff

All staff are responsible for:

- Checking that any information that they provide to EPG Energy in connection with their employment is accurate and up to date.
- Informing EPG Energy of any changes to information which they have provided. i.e. change of address.
- Checking such information as EPG Energy may send out from time to time, giving details of information kept and processed about staff.
- Informing EPG Energy of any changes or errors of which they become aware. EPG Energy may not be held responsible for such errors unless the staff member informs EPG Energy of them.

Data Security

If and when, as part of their responsibilities, staff collect information about other people, they must comply with the following data security requirements.

All staff are responsible for ensuring that:

- Any personal data which they collect is kept securely.
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Should such a breach occur it must be reported to the Data Protection Officer who will subsequently report it to the ICO.

Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal information should be subject to restricted access:

If physical data (i.e. paper copy) the data should be kept in a secure location such as an office with physically restricted access, such as a key coded door. Where possible the data should also be kept in a lockable location such as a filing cabinet or desk draw.

If data is computerised, the data must be password protected on PC, server or other networked computer device, or kept only on an electronic storage media which itself is kept securely (e.g. USB disk, external hard drive). Where such media is used the media should be encrypted.

Rights to Access Information

Any person who wishes to exercise their right to either request notification of the information currently being held on them or access the information itself should make a formal request initially to EPG Energy's Data Protection Officer, or in the DPO's absence, any other available Director. The request should be made in writing but the format is optional.

EPG Energy reserves the right to charge the requestor £10 on each occasion that access to information is requested, only if EPG Energy deems the requestor is making an unreasonable number and/or high frequency of requests.

EPG Energy aims to comply with requests for access to personal information as quickly as possible, and will ensure that it is provided within 5 business days, unless there is good reason for delay. In the event of the 5 business day timeframe not being met EPG Energy will advise the requestor of the reason for delay and an eta for the request completion.

Subject Consent

EPG Energy can only process personal data with the consent of the individual. In some cases, if the data is sensitive, explicit consent must be obtained. Agreement to EPG Energy processing some specified classes of personal data is a condition of employment for staff. This includes information about any criminal convictions.

EPG Energy may ask staff for information about particular health needs or problems, such as allergies to particular forms of medication, or any conditions such as asthma or diabetes.

EPG Energy will only use the information in the protection of the health and safety of the individual.

The Data Controller and the Designated Data Controllers

EPG Energy is a Limited company and the ultimate data controller under the Data Protection Act 1998 and its Board of Directors is ultimately responsible for implementation of this policy. However day to day enforcement and management of the policy will primarily reside with the Data Protection Officer.

Queries

Any queries regarding this policy should initially be sent to:

Data Protection Officer
EPG Energy
Hurst House
131-133 New London Road
Chelmsford
Essex CM2 0QT

Tel: 01245 254 910

Email to epgenergy-dpo@epgenergy.com

