



Privacy Policy

Introduction

We know that providing personal information is an act of trust and we take that very seriously. Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This Privacy Policy will tell you what we collect your data for and how we keep it safe for you. If you have any questions about this policy, please contact us.

If you have any questions about this privacy policy, please contact us at madhuban@carbonlaces.com

Our contact details

CarbonLaces Limited, registered in England and Wales (Company number 12196256) at 2b Achilles Road, London, NW61EA; VAT number 383318585.

Why do we have a Privacy Policy?

Most of the data we collect and hold about you is for the purpose of providing you with climate-finance. We also use data to make CarbonLaces' products and services better for our customers. We'll collect certain personal information from you when you use our website, when you get in touch with us about any of our products or services, and during any process to sign up, change or cancel your products and services.

The purpose of our privacy policy is to let you know:

- How and why we collect your personal information;
- How we use and disclose your personal information (and to whom);
- How we protect your personal information; and your legal rights and how the law protects you.
- Changes to our privacy policy

We keep our privacy policy under regular review. This version was last updated on the date listed in the footer of each page. If we make any changes to our privacy policy, we'll post changes on this page and, where appropriate, notified to you by e-mail and when you next start the App or log onto one of the Services Sites. Where you use the App or the Service Site, the new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

We may also notify you in other ways from time to time about the processing of your personal information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only if necessary for the purposes we have told you about.
- Kept securely.

When this Policy applies?

For the purposes of this Policy, "we", "us", "our" and "CarbonLaces" means CarbonLaces Limited. Unless otherwise stated, CarbonLaces is the Data Controller for your personal data. This Policy applies to how we use your information in relation to our products and services generally.

This Policy doesn't apply to other Companies' sites that you get to through our website or Social Media pages. So, sure you've read their policy before putting your personal information on their site. Your continued use of our services will mean that you accept and agree to any changes to the Privacy Policy.

Your legal rights

Your rights to your data

If we collect or handle your personal data, you have rights as an individual which you can exercise in relation to the information, we hold about you:

- To correct or update your personal information, you can log into your CarbonLaces account via the App or website
- To delete your personal information, you can email us. We will make every effort to delete any information we no longer need to hold, but we won't always be able to do this. For example, we may need to hold your information to continue to provide your energy under the contract or for future reporting purposes under the FCA or TCFD reporting. If this is the case, we'll explain why.
- To ask us to restrict processing of your personal information or transfer your personal information to a different organisation, you can email us
- To request the transfer of your personal information to another party ("data portability").

- To confirm how we are using your personal information or access to the personal information that we hold about you, in an easy to understand, portable and secure format you can email us with the subject line "Access Request".
- To object to the processing of your personal information, you can email us.
- To withdraw consent to process your data, you can email us.
- To opt-out of marketing communication, you can email us.

All email should be directed to support@carbonlaces.com

Once we receive a request from you, we will respond within 5 working days. Before actioning these requests, we will need to positively identify you through our normal security and data protection checks. If you have any data protection complaints, you're able to contact the Information Commissioner's Office (ICO) (www.ico.org.uk). We'd like to try and help with any concerns you may have before you contact the ICO, so please get in touch with us in the first instance.

Your personal information

Collecting your personal information

We (and/or our agents) will collect certain personal information from and about you during your sign-up journey, when you get in contact with us, use our website/App or community and as part of providing our services to you. Not all the information below will be collected at once and we will have a bespoke menu which we will adhere to and agree with the customer before moving forward. We may also monitor and record any communications we have with you, including phone calls, live chats and emails, to make sure we are providing you with the best service we can. It does not include data where the identity has been removed (anonymous data). The information we collect includes:

- **Contact data;** your name, email address, postal address, phone - number, date of birth and any other relevant information we need in order to contact or identify you;
- **Financial data;** your bank account and payment details relating to products and services you receive
- **Technical data;** internet protocol (IP) address, your login data (including your App and Community username and password), browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We track technical data by using cookies (see 'Cookies' section below for more details);
- **Usage data;** information about how you use our website, products and services;

- **Location data;** information that a mobile device, like a smartphone or tablet, provides about its current position in space;
- **Marketing and communications data;** your communication preferences for receiving marketing from us and our third parties;
- **Energy supply data;** your supply start date, meter technical details, tariff and if you have a smart meter installed at your property, we'll also capture your energy consumption data;
- **Special categories of data;** health and financial vulnerability data, if applicable, to include you on the Priority Services Register.

We may also use aggregated data, in order 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.

It's important that the personal data we hold about you is up to date so please let us know if your personal data changes at any time.

Using your personal information

Where we use your personal information to pursue our legitimate interests, we will only do so provided your interests and fundamental rights do not override those interests. We use your personal information for a variety of purposes. The following sub sections

Highlight the main ways we use your personal information and the legal basis on which we rely.

- **To provide digital services** to you so that you can track your usage. For the legitimate interests of our business to provide services to you.
- **To learn about the usage of electricity,** gas by our users for the legitimate interests of our business to track how electricity is being used in order to improve our services.
- **To supply you with energy and climate services** we gather information about you and your home so we can accurately supply your energy. For example, we need to know your address to supply the right property, and we need to know how much energy you use so we can send you accurate bills or set up new services. Where necessary, we share this with other organisations in the energy industry, like your old supplier, Ofgem and the organisations that maintain the national energy databases. This will be for the legal basis of (i) performing a contract to which you are a party and (ii) for the legitimate interests of our business to provide services to you.
- **To make Us better** we collect data on how you use our website, App and other features. We track things like where you click on our site and what features you use. This lets us learn what's working well and which features we need to improve. We sometimes share this data in an aggregated form (non-personalised) with agencies or partners that are

helping us. For example, we might tell a telecommunications partner how many phone calls we get a week. This will be for the legal basis of the legitimate interests of improving the services we provide to you and to other customers.

- **To personalise and promote CarbonLaces** we use your data to help us grow and spread the word on renewable energy. If you're with CarbonLaces, we share data with social media, search engine, and other advertising platforms so that we stop asking you to join us, and instead show you content more relevant to you. This will be for the legal basis of the legitimate interests of improving the services we provide to you and to other customers.
- **To communicate with you** we will, in addition to sending you key information about your account by email, from time to time we'll also send you information about things we think will interest you. Where necessary, we share your data with organisations that send communications on our behalf. This will be for the legal basis of (i) performing a contract to which you are a party and (ii) for the legitimate interests of our business to provide services to you.

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Automated decision making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Sharing your information

We sometimes need to allow our service providers to process personal information we hold about you on our behalf for the reasons set out in this Policy or as otherwise required by law. We make sure that these third parties won't use your personal data for their own purposes, and we only permit them to use it in accordance with our instructions and the law. This includes the following types of organisations:

- **Trusted businesses or persons;** processing your information for us for the purposes set out above, based on our instructions and as set out in our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with member support, access services or payment processing.
- **Trusted third parties;** We also share Personal Data with certain third parties. This includes without limitation: certain cloud providers such as Microsoft and its Cloud Services and certain providers for analytics services, such as Google

- **Energy industry partners;** including other suppliers, National Grid, network operators and energy market administrators
- **Payment providers;** we may work with payment providers to process your payments.
- **Marketing agencies, search engines and social media networks;** to advertise CarbonLaces and to gather feedback on CarbonLaces such as through customer surveys.
- **People you have authorised us to share data with;** such as family members, energy brokers, solicitors and debt management companies, so we can fulfil your requirements.
- **Market regulators;** such as Ofgem and consumer protection organisations such as the Energy Ombudsman, where we are obliged to do so under regulations.
- **Aggregated (non-personalised) data;** with agencies that help us with advertising. For example, we might share with an agency how many of our members live in Scotland.

When you share your own information sometimes you may share your information publicly, such as by posting in our community or on social media sites. Remember, when you share information publicly it may become accessible through search engines.

Disclosing your personal information

It's important that you understand what we'll do with the data that we hold about you, as well as the lawful reasons we can do this. We may sometimes combine information that we collect from you with information we obtain about you from third parties and affiliates and information derived from any other subscription or analysis, product, or service we may provide. We use the information we hold about you for the following purposes:

Performing our contract with you means that we need to process information in order perform our obligations under the contract. For example, we may use your information (such as your contact information) to organise your switch to CarbonLaces, to take monthly payments and organise meter repair jobs or to help supply you with trusted suppliers

Fulfilling our legal and regulatory obligations means that many of the ways we manage your energy are based on requirements set out in our Supplier License Conditions and by Ofgem Codes of Practice, such as how we set out your annual statement and how we deal with disputes. We may also need to comply with court orders and disclose information to law enforcement agencies where we are obliged to do so.

Adding you to our Priority Services Register with your consent when you have let us know that you (or a member of your household) need extra care or have any vulnerabilities, means that we will ask for your explicit consent before we add your details to our Priority Service Register. This helps us take steps to ensure your safety in emergencies.

Taking smart meter readings with your consent means that we'll normally collect readings up to every half hour to ensure we optimise your energy and trading potential.

Analysing your smart meter readings to offer you new products and services with your consent, for example, with a smart meter, we could use your meter readings to understand how you use your energy, so we could build and offer you new products and services relevant to your needs.

For our legitimate business interests, where your information is necessary for us to build our business and provide our services to you. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include maintaining and improving our services for example, we may use information that we obtain through your emails and calls to train our team. We may also use your information to ensure that our services are working as intended – for example, understanding which parts of the website are easiest to use. We may also contact you for suggestions on how we can improve the way we provide our services to you. We look at the data to ensure this isn't going to affect you in any adverse manner and will put stipulations in place to ensure its not used to negatively impact your credit rating.

Providing personalised messages to make sure messages are relevant to you, we may let advertising platforms like Facebook and Google know that you are a member of CarbonLaces by sharing your contact details with them. This means we can stop asking you to join CarbonLaces once you're with us, and instead share information with you that we think you might be interested in.

Communicating with you about our services we may contact you about CarbonLaces news, updates and new products or services that we think might be of interested. We may also contact you to provide you with offers, competitions, marketing materials and other promotional materials, both online and through other marketing channels, such as third-party social networks, like Facebook.

Measuring our performance and developing new services, for example, we use data to understand how our services are used. We also use aggregated data to understand our members and their energy usage better. We also use data to help to prevent and detect fraud or debt and recover unpaid bills. We also use the data to create new data services for climate impact.

Protecting your personal information

It's all about keeping your information secure. Whilst we cannot guarantee that unauthorised access to or unauthorised alteration, disclosure or loss of information will never occur, we work hard to prevent it. In particular:

- We use managed infrastructure of Microsoft Azure located in the UK or the European Economic Area to store and process your data, adhering to Microsoft best practices (i.e. encryption) to keep your data private while in transit and at rest.
 - For data at rest, all data written to storage is encrypted and the keys that protect your data are managed by the cloud service provider.

- For data in transit, all data moving between user devices and cloud providers datacenters or within and between the datacenters themselves adhere to IEEE 802.1AE MAC Security Standards. Applications delivered by CarbonLaces makes use of industry-standard encrypted transport protocols, such as Transport Layer Security (TLS) and Internet Protocol Security (IPsec).
- Your account information is protected for your privacy and security through B2C and B2B identity providers. As a business user you will be required to authenticate with the business identity provider used by your organisation. Whereas as a private user you will be able to authenticate with the username and password configuration or through the social identity provider you have chosen during signup. CarbonLaces and our agents will never ask for your password. and our agents will never ask for your password.
- We review our practices for collecting, processing and storing personal information, including physical security measures to guard against unauthorised access to systems and backups to prevent the loss of information. We will continue to enhance our security procedures as new technology becomes available.
- We restrict access to personal information wherever possible to people who need to know that information to process it and who are subject to contractual confidentiality requirements.
- You can also help to keep your account and your personal information secure; you should not disclose your password details to anyone. You should make sure your CarbonLaces account password is different from your email address password, and we recommend you change your passwords from time to time.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Sources of the Personal Data

We receive personal data directly from you. In some cases, this will be via the devices installed at your premises and through your consent for our smart meter.

Receiving/Sending your data outside the European Economic Area and the UK

Sometimes our agents and service providers may be based outside the European Economic Area, so when working with them, we may pass your information outside of the European Economic Area to countries that do not have the same data protection standards as the UK. If we do this, we will ensure that any information is protected in line with this Privacy Policy.

Some of the third parties with whom we share Personal Data are also located outside the EEA. Certain third countries, such as Canada and Switzerland, have been officially recognized by the European Commission as providing an adequate level of protection.

Transfers to third parties located in other third countries outside the EEA take place using an acceptable data transfer mechanism as, the EU standard contractual clauses for data transfers, Binding Corporate Rules, approved Codes of Conduct and certifications, or in exceptional circumstances based on permissible statutory exceptions.

Transfers or access of data from third parties located in the UK relating to Data Privacy Rules of Ofgem and its administrators and partners.

How long will we keep your personal information?

We keep the personal information we collect for no longer than is necessary for the purposes for which we collected it. The length of time depends on the purposes for which we use it, or otherwise to meet our legal obligations under the period of consent given by the customer.

We will delete or anonymise any information as soon as we no longer have a valid reason to hold it, or consent is withdrawn. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Personal account data will be deleted without undue delay if the request for deletion is made and at the latest within one month.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Cookies

Cookies are small text files generated by the website you're viewing. They allow the website to store information as you browse. Web cookies contain data that can be used to make your browsing experience better. Cookies are safe for your computer. They only store information used by your browser. They can't access any other content on your computer, nor do they create malware or viruses.

How and why we use cookies?

We use cookies to remember you. They're needed to allow our website and App to function properly, and we also use them to improve your online experience and to help us deliver personalised messages to you. By using our website, we're assuming you're happy with our use of cookies, and you are providing your consent to us storing and using cookies in accordance with this policy.

Here are the keyways we use cookies and the third parties we allow to place cookies. We've included some examples below:

- **Logging in cookies** remember that you're logged in to your CarbonLaces Account.
- **Preferences cookies** remember your preferences such as the language you use

- **Website optimisation** we may use tools to test different web designs by showing you a version of our website that is different to everyone else's, so we can see which is best.
- **Chat** to allow you to continue the same chat conversation even if you come back later.
- **Web Analytics** we use programs like Google Analytics to help us find out how many people visit our websites, where they came from, what devices they used, which pages they visited, and what information they are searching for.
- **Help articles we use Zendesk** to help us to analyse what our members are searching for in FAQs, and whether the articles we have are useful.
- **Web sessions recording tools** allow us to view your web session in real-time. By replaying your journey through our website, it helps us see the website through your eyes and helps our tech team find and fix errors and improve the usability of the website.

How can you manage cookies and where can you find more information?

Most browsers enable cookies by default, but you can delete or block cookies in your browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org. You can also get in touch with some of the third parties we work with to adjust your cookie settings. Many websites offer helpful information about how you can delete or block

Cookies in different browsers. Blocking cookies will mean that parts of our website, and other websites you visit, may no longer function properly.