

Privacy Policy

Introduction

This is the Privacy Policy of Verdabelo ESCO Limited of 3 Shortlands, Hammersmith, London, W6 8DA.

We take confidentiality of our customer's data extremely seriously. We are committed to protecting the privacy of your personal information which we obtain about you when you apply to us to for an Energy Savings Agreement and throughout our relationship with you.

The Data Protection Act, 1998 (the "DPA") governs the way in which we, as a business, are required to handle, manage and store personal data on individuals. The following sections explain how we will use your personal data once you have applied to us for any of the services that we provide in order to show our commitment to compliance with the DPA. "Personal data" is personal and financial information about you which identifies you and which is necessary and relevant for us to collect in order to provide our services to you.

We will require your consent to process and use your personal data as set out below in order to provide you with the service you are applying for. This includes being able to utilize and have access to third party data for a number of purposes as part of our function to proceed with an application process for an Energy Saving Agreement. Please note that if we are unable to obtain your consent to use your personal data in the way described below we will not be able to provide the requested services to you.

The personal data held by us in relation to you will be held on our computer systems and/or our internal records to assist us. Whether it is processed in the UK or overseas or when it is sent to other members of the Verdabelo Group, your information will be subject to a strict standard of confidentiality applying to us, our employees and any applicable third parties. Your data will be processed in accordance with all applicable data protection legislation.

How we collect information about you

We collect personal and financial information about you when you provide us with data on our website, over the telephone or by email and when you send us documents, or from any third parties.

The information you give us may include your name, address, date of birth, email address and contact telephone number, employment status, occupation, financial information including your income, assets and current financial commitments. We will collect information about your household energy consumption and its cost.

We will also collect information about you to verify your identify and your home address. We may also verify such information by accessing external databases and agencies and also to prevent fraud and money laundering (see below).

We will only collect information about you where this is necessary in order for us to be able to provide you with our services.

Confidentiality

Your personal data will remain confidential. We will not otherwise disclose, sell or distribute your personal data to any third party without your permission or unless we are required to do so by law or have a public duty to do so. In addition we may disclose your personal details to:

- a. any organisation having a legal right to your personal information, including the Financial Conduct Authority or any other UK or overseas government body or regulator, the police and any other enforcement agencies and authorities;
- b. our auditors, lawyers and professional advisors who have agreed to treat your personal details as confidential;
- c. Subcontractors who will provide installation services at your home and who will have to have access to personal information of yours that it is necessary for them to have. Confidentiality agreements will be signed by these parties before they subcontract for us.
- d. other organisations which provide a service to us relating to your Energy Savings Agreement or other agreement you may have with us and which helps us to support and provide services to you, but always on the basis it is kept confidential;
- e. any organisation that we may transfer rights and obligations under any contract with you, including where we pass information to a third party funder as part of a securitization arrangement, this currently being EnerSave SCA Luxembourg;
- f. any licensed credit reference and fraud prevention agencies, debt collection agencies, legal advisers or other organisations which may assist us, including following any default or failure by you to meet your responsibilities under the applicable terms and conditions of any agreement you have with us; or
- g. any other third party with your consent.

How we will use your personal data

The information provided by you will be held on our computer systems or other records to assist us in providing the service for which you applied for and in our dealings with you.

We will also use your personal data for carrying out the following:

- a. Assessing your energy consumption and the condition of your home to determine the suitability of your obtaining an Energy savings Agreement with us.
- b. Making decisions about offering your credit
- c. Administering your account and collecting payments
- d. Assisting in verifying your identity
- e. Assessing credit and other risks
- f. Developing, testing, researching and improving products and services
- g. Business and statistical analysis
- h. Legal and regulatory compliance
- i. Preventing or detecting financial crime

Credit reference and fraud prevention agencies

In order to process your application, you agree that we may search your records at credit reference and fraud prevention agencies to obtain information about you to protect us against fraud, to help verify your identity and in our assessment of your suitability as a customer. As such we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take banking services from us we may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When you apply we perform a quotation (soft) search which can only be seen by you and us at a credit reference agency. We will convert this to a full (hard) search if you proceed with the agreement and installation. When CRAs receive a full (hard) search from us they will place a search footprint on your credit file that may be seen by other lenders.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in the CRAIN document that you will find in a PDF format on our website. CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document: Callcredit: <https://www.callcredit.co.uk/crain>; Equifax <https://www.equifax.co.uk/crain> ; Experian <http://www.experian.co.uk/crain/index.html> .

Information about products and services

Subject to the marketing preferences indicated by you, we may use and share relevant information about you, your transactions and your relationships with other companies within the Verdabelo Group, each of whom may send you information about their products, services and promotions which we/they think may interest you, by telephone, post, email or fax.

We may also provide information about your energy consumption to energy aggregators with a view to providing you with improved services, better prices or other benefits relating to energy services.

When you become a customer, we will ask you whether you are happy for us to contact you for marketing purposes. We will contact you from time to time to remind you of the opportunity to “opt in” or “opt out” of receiving such information.

Overseas transfers

We may need to transfer your personal data to data processor providers who are located outside of the UK. At present this is to be limited to countries within the European Economic Area (EEA). This includes EnerSave SCA Luxembourg, a company that is involved in the securitization of the monies payable under your agreements with us.

We will comply with our statutory obligations at all times in respect of ensuring that your data remains protected by adequate technical and security measures. In the event that we send you data to countries outside of the EEA and which do not have adequate data protection laws we will nevertheless ensure that your data remains adequately protected at all times.

Your right to see your records

You have rights to apply for a copy of certain personal records that we hold about you and to have any inaccuracies corrected. We may charge a fee of up to £10 for providing this data to you.

Retention of your records

The period that we retain your records depends upon the basis on which it was provided. We may retain copies of your personal data even after your relationship with us has ceased. Generally however:

- a. we will keep the information no longer than is necessary to enable us to provide you with a service that you have requested for as long as it takes us to provide that service
- b. we may retain copies of passports, driving license or other identification evidence that you provide in accordance with the verification process for the product or service you have applied for.
- c. we will keep your contact details for as long as we have your consent to send you marketing information and/or pass your contact details to third parties; and
- d. we will keep other information about you if it is necessary for us to do so to comply with our legal and regulatory obligations.

Telephone calls

To ensure that we carry out your instructions accurately, to help continually improve our service, for staff training and quality control purposes and in the interest of security, we will monitor and record our telephone calls with you. If a misunderstanding should arise and a recording is available, we will only use this under appropriate supervision. Any recordings will remain our sole property.

Complaints

You have a right to complain to the Information Commissioner's Office if you are unhappy with the way we handle your data. Their details are Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, telephone 0303 123 1113 or email casework@ico.org.uk. You can also download and complete a complaint form at <https://ico.org.uk/concerns/>

Changes to the Privacy Policy

We reserve the right to make changes to the Privacy Policy at any time.