



## Privacy Policy

We, Marble Power Limited, are a data controller in respect of your personal data. This Policy explains how we use your personal data, our legal basis for such use and your rights in relation to our processing of your personal data. Please read this Policy thoroughly so you know how we use your personal data, who we share it with and so that you understand your rights.

Should you have any queries about our processing of your personal data please email [contact@marble-power.com](mailto:contact@marble-power.com).

### What personal data do we hold on you?

We gather personal data about you whether or not you enter into a contract with us.

Reference to your **personal data** means any data which, by itself or with other data we may hold, can be used to identify you. If you are a limited company personal data we hold will relate to your directors' and employees' personal business contact details such as business email addresses and phone numbers. If you are a sole trader or partnership additional the data we hold on your business will be classified as personal data such as financial information and bank account details, MPANs and automated meter data.

The personal data we hold may include the following.

**Business name and address** (including previous business addresses)

**Home address** (including previous home addresses)

**Site addresses**

**Contact details** (office/site address, email address, landline and mobile phone numbers)

**Date of birth**

**Bank account and credit card details**

**Financial Details**

**Information from credit reference or fraud prevention agencies**

**MPANs and/or MPRNs**

**Meter Data**

### Our data sources

Other than data from you, we also collect data from third parties. This includes other industry organisations who are involved in the services we provide to you such as your distributor or shipper, meter equipment owners and meter readers and your previous energy supplier.

We may obtain personal data from brokers or consultants where you are using them to help you find energy products and services. We also use third parties to verify information you have provided to us such as Companies House (to verify directors details), your bank (to verify bank details) and credit reference and fraud prevention agencies (to obtain information about your repayment history or your credit rating or where we need to trace you for debt repayment purposes).

Where you are a tenant we may obtain information from your landlord or letting agent to help us set up your account.

If you have given consent, other third parties may share your personal data with us to allow us to market to you.

### Legal Basis of processing

This section explains the legal basis on which we use your personal data.

We processing your data to take steps to enter into a contract with you and/or to perform our contract with you including:

- Taking steps to verify your identity and the data you have provided to us
- Setting up and managing your account

- Preparing invoices and processing billing/tax information - Collecting debts
- Sharing personal data with industry participants such as metering agents
- Complying with any other contractual requirements

The following processing we undertake in our own legitimate interests:

- Recording calls to monitor activities on your account and for internal training purposes
- Preparing internal reports and forecasting to analyse and share data for good governance and improving customer service
- Managing your account appropriately
- Responding to and addressing complaints and/or claims.
- Sharing personal data with third party metering agents in order to manage your account
- Analysing data for auditing purposes - Searching credit reference agencies
- Reviewing payment plans for good governance and management of our business
- Recovering debts
- Obtaining feedback for market research and analysis for business improvement
- Carrying out data enrichment and ensuring the information we hold is accurate and up to date
- Reporting to and paying referral partners such as brokers
- Using Web analytics to analyse and better configure our website
- If you have a display unit with your automated meter we may send messages to its display unit.
- If you have an automated meter to record your energy use.

We will carry out processing where required to comply with a legal obligation. As an energy supplier we are subject to licence conditions and energy-specific law and regulations as well as general law. Some examples of the obligations we have as an energy supplier are as follows:

- Sending data to Ofgem and Elexon (or other relevant law enforcement or government agencies) to comply with our industry reporting obligations
- Preventing and detecting fraud and other criminal activity by alerting fraud prevention and credit reference agencies and law enforcement agencies such as the police and HMRC where we suspect fraud
- Helping to prevent and detect theft, fraud or loss of gas or electricity by preparing and sending reports to the entity contracted to run the Theft Risk Assessment Service (TRAS) on behalf of all electricity retailers.
- Sending information to relevant law enforcement agencies or government agencies where we have been asked to provide the information for legal or regulatory reasons
- Holding and using emergency contact details

We will only carry out the following activities where we have your consent to do so:

- Setting up direct debits with your bank (this will require the transfer of bank account information to our payment provider, Allpay Limited)
- Contacting you to offer additional services and products

You can withdraw your consent to the above at any time by contacting us at [contact@marble-power.com](mailto:contact@marble-power.com)

### **Sharing your personal data**

Some of the personal data we hold we may share with third parties such as agents and other service providers. We may do so for the following reasons:

- To enable us to assess your credit position we may share your data with credit reference agencies. We currently use Experian as a credit reference agency. Experian's role as a fraud prevention agency, the data it holds, the ways in which it uses and shares personal data, data retention periods and your data protection rights with Experian are explained in more details in the Credit Reference Agency Information Notice which is available from Experian at [www.experian.co.uk/crain](http://www.experian.co.uk/crain). The information we share may be supplied to other organisations to perform similar checks to those set out above and to trace your whereabouts.
- To a debt recovery agents to pursue debts on our behalf or we may use a credit reference agency or fraud prevention agency to trace you if necessary to recover your debt.
- With entities providing us with credit insurance and with credit insurance brokers
- To industry participants based on agreed industry processes which may include distributors/shippers, metering agents and other energy suppliers. If you are a supply customer and there is outstanding money on your account at the time

you request a transfer to a new supplier we may tell the new supplier about such debt

- Where we suspect someone has committed fraud or stolen energy by tampering with a meter associated with your account or by diverting supply we will record such details on your account and share such information with Ofgem and other energy suppliers as required to comply with our legal obligations. The TRAS Fraud Prevention Agency will hold this information and may provide it to other energy suppliers (where you have an energy account with them) or to Ofgem and other industry bodies.
- With regulatory and other government agencies to comply with our regulatory or legal responsibilities
- To any third party who acquires any of our business or assets
- To obtain professional advice
- If you have asked the Energy Ombudsman to assist you in dealing with a complaint, we may transfer personal data to them

### **Automated decision-making and profiling**

We do not carry out any decision making about you which solely relies on automated processing.

### **Meter Data**

We receive information about your energy use from your meter equipment owners and meter readers. This is the Metering Point Administration Number (MPAN) or Meter Point Reference Number (MPRN), the meter serial numbers and the meter reads. We receive this information from all meters.

If you have an Automated Meter we receive this information automatically

We can use your Automated Meter data to

- produce your bills;
- calculate any debts you owe us;
- provide energy information for industry purposes in line with regulations; and
- predict the amount of energy you and other customers will need.

We will always collect data at least monthly. We will also take ad hoc meter reads to maintain accurate billing where we need to send you a bill after changes to your account, if we need to resolve a query from you or if we think your automated meter has been damaged or been compromised in any way. We may also collect more frequent information, up to half hourly, for the following extra purposes

- To send you more accurate bills, so that we do not need to estimate your bill if you move site or change your energy plan.
- To help us predict how much energy you will need and identify patterns in your energy use, so that we can make sure we are developing the right energy plans and services for our customers
- To give us more detailed information about your usage, so that we can respond to your questions or complaints more easily
- To help us identify if your meter has been damaged or isn't working properly – so that we can be sure you are paying the right amount for the energy you have used
- To give you feedback about your energy use – so that we can help you manage it better.

We will only collect your energy data on a half hourly basis from your automated meter if:

- we are under a legal or regulatory obligation to do so; or
- where we do not have a legal or regulatory obligation to do so, we have a legitimate interest to do so unless you contact us by the methods set out below to request that we do not collect your energy data on a half hourly basis. In this scenario we will not collect data half hourly if you request us not to.

The half hourly data will only be collected by us once a day.

### **If you have an automated meter at a Premises and you move out of those Premises**

You must notify us in advance if you or any tenants are leaving your premises so we can ensure the Automated Meter Data is not available to the new occupier as we can only prevent access to your data from the date that you tell us that you have moved.

### **Limitations**

If you are the account holder for electricity, and not the account holder for gas (or vice versa) at a premise we supply, both account holders will have access to the Automated Meter Data.

### **Overseas Transfers of Data**

We do not currently send personal data outside of the European Economic Area (EEA).

## How long do we keep your personal data for?

We will keep your personal data for as long as we need it to provide you with the products and services we are contracted to provide you and to comply with our legal obligations, to enable us to resolve any disputes and to enforce our legal rights. This may vary depending on the type of personal data we hold but our policy is to not retain any data for longer than we need to. We hold Automated Meter Data for up to 24 months.

## Your rights under data protection law

You have the following rights in relation to the personal data we hold on you:

- **The right to be informed about our processing** – the information in this Policy is intended to inform you about the processing we carry out
- **The right to have personal data corrected if it is inaccurate or incomplete** – you can ask us to change or complete any inaccurate or incomplete or incorrect personal data that we hold about you
- **The right to withdraw consent** – if you have given us consent to process your personal data you have the right to withdraw that consent at any time by contacting us at [contact@marble-power.com](mailto:contact@marble-power.com)
- **The right to object to processing based on it being in our legitimate interests** – where we rely on the legitimate interests legal basis to process your personal data you have the right to object to us using your personal data for those purposes. We do not have to stop processing your personal data if we can show that it is in our overriding interests to carry on processing your personal data and it will not cause you unjustified harm.
- **The right to restrict processing** - you can ask us to restrict the personal data we use about you where you have asked for it to be erased or you have objected to our use of it
- **The right to have personal data erased** – you have the right to have personal data deleted where it is no longer necessary for us to use it, you have withdrawn consent or we have no lawful basis to keep it
- **The right to request access to your personal data and information about how we process it** – You have the right to a copy of the personal data we hold about you and certain information about how we process it. We will not charge a fee unless your request is manifestly unfounded or excessive (particularly if it is repetitive) when we may charge you a reasonable fee based on our administrative costs
- **The right to move, copy or transfer personal data** – you can ask us to provide you or a third party with personal data you have provided to us in a structured, commonly used electronic form.

You can request any of these by emailing [contact@marble-power.com](mailto:contact@marble-power.com).

You also have the right to raise a complaint with the Information Commissioner's Office if you have concerns about how we process your personal data.

## Use of our Website

### External links from our website

From time to time we may include links to sites which are created or owned by third parties. We do not take any responsibility for the information or practices of the companies whose sites these are, nor the information contained within them. This Policy does not cover the links within this site linking to other websites. You should you to read the privacy statements on the other websites you visit.

### Visitors to our website

We collect standard internet log information and details of visitor behaviour patterns. These analytics enable us to see how people use our website and enable us to improve the accessibility of our website. We do this in a way that does not involve personal data.

### Cookies

We use third party analytical tools (such as Google Analytics) to analyse how our website is being used. These tools use "cookies" (small text files placed on your computer) to collect standard internet log information and visitor behaviour information in an anonymous form. Full details of the types of cookies we use and how we use them are set out in our Cookie Policy.

We do not use cookies to collect personal data.

## Changes to this Policy

We may update this Policy from time to time and therefore advise you to check it regularly to ensure that you are aware of any updates. Significant changes to the personal data we hold on you or the way in which we use your personal data will always be highlighted to you.