

ENSTROGA LTD. (hereinafter "ENSTROGA") informs users/customers (hereinafter "YOU") that it complies with the current legislation regarding the protection of personal data, user privacy and the secrecy and security of data, adopting the necessary technical and organizational measures to avoid the loss, misuse, alteration, unauthorized access and theft of the personal data provided, taking into account the state of the technology, the nature of the data and the risks to which they are exposed. Through this Privacy Policy, ENSTROGA informs you of our website, www.enstroga.co.uk, as well as our webmail service, of the treatment and uses to which the personal data collected on the web are submitted, so that you can decide, freely and voluntarily, if they wish to provide the requested information.

ENSTROGA reserves the right to modify this Policy in order to adapt it to new legislation, jurisprudential criteria, industry practices or company interests. Any modification of this policy will be announced in advance to inform YOU.

1) Who is responsible for my data?

The person responsible for the processing of your personal data is ENSTROGA LTD. (hereinafter "ENSTROGA"), with company registration number: 09812700 and registered office at Alexandra House, 43 Alexandra Street, Nottingham, NG5 1AY.

Contact details of the data protection officer responsible:

Postal mail: Alexandra House, 43 Alexandra Street, Nottingham, NG5 1AY

Contact email: DPO@enstroga.co.uk

2) What data do we collect from you?

The type of data we collect can include:

1. **Identifying data:** Name, surname, user name or similar identifier.
2. **Contact information:** address of the supply point, billing address, telephone numbers, email addresses.
3. **Payment information:** bank account information / credit card information.
4. **Profile data:** username and password, in case you use the customer portal of our website.
5. **Usage Data:** includes information about how you use our website, products and services.
6. **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
7. **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, as well as your journey through our digital platform We may also analyse which marketing activity led to your taking specific action on our digital platforms.

As you interact with our website, we may also automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other

websites employing our cookies. Please see our [cookie policy](#) for further details.

All personal information we collect about you will be registered, used and protected by ENSTROGA in accordance with the applicable data protection legislation and with this privacy policy. Sometimes, we can supplement the information that YOU provide us with the information derived from our relations with YOU.

ENSTROGA does not intentionally collect data from children under 16 years of age.

3) How do we collect personal data?

We use different methods to collect data about YOU.

- a. **Direct interactions:** You may give us your data by filling in forms, using our website, using Wi-Fi, by corresponding with us by post, phone, email or otherwise.
- b. **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources, such as:
 1. Technical Data from analytics providers such as Talent or Google; advertising networks and search information providers all based inside or outside the EU.
 2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU;
 3. Identity, Contact, Marketing and Communications Data from research or marketing agencies.

4) Use and purposes.

Information about our customers, guests and invitees is an important part of our business and we do not sell it to others. We only share it in the circumstances set out below.

The purpose of the collection and processing of personal data responds according to each specific case, to the management of the provision of electricity and/or gas supply services, i.e. carrying out the execution of a contract or compliance with the obligations deriving from it, as well as for the purpose of managing and responding to requests for information, queries or suggestions, or in the publications or any services or activities, events or events offered by ENSTROGA. Likewise, the data may be used to send information, by any means, about the above aspects and in relation to other services or products of ENSTROGA, including the sending of commercial communications whenever you have authorized it.

When contracting regards to your energy supply, all data necessary to manage your connection to the grid will be communicated to the respective administration systems, which may be accessed by parties determined by the current legislation at all times.

As your supplier we are also acting on behalf of your network operator to make an agreement with you. The agreement is that both you and your network both accept the National Terms of Connection (NTC) and agree to keep to its conditions. The NTC is a legal agreement. It sets out rights and duties in relation to the connection at which your network operator delivers electricity to, or accepts electricity from your home or business.

If you want a copy of the NTC or have any questions about it, please write to:

Energy Networks Association,
 6th Floor, Dean Bradley House,
 52 Horseferry Road, London SW1P 2AF:
 Phone 0207 706 5100,
 or visit the website at www.connectionterms.co.uk.

If you (or a member of your household) need extra care (for example, because of your age, health, disability or financial circumstances), we keep record and share this information with the following people to ensure your supply is not interrupted and/or meet your special needs:

- other energy suppliers if we believe you are considering changing supplier;
- outsourced service companies that manage a wide range of energy industry data interactions on our behalf;
- the electricity distributor; and
- the relevant gas transporter, metering agents or network operator.

5) Personal Data retention

The personal data of the clients will be kept as long as necessary for the provision of the satisfying any legal, accounting, or reporting requirements. In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

6) Right of use

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the reasons we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Reason for data collection	Type of data	Legal basis for usage	In which cases can data be collected?
Execution of the existing contract between the USER and ENSTROGA: - Fulfilment of the obligations deriving from it.	Identification data: Name and surnames. Contact information: address of the supply point, billing address, telephone numbers, and email.	Contractual relationship. Compliance, development, control and execution of the contractual relationship established between the USER and	Information provided by the USER. Contact forms.

<p>- Compliance with the legal obligations that result from application.</p>	<p>Payment information: bank account / credit card number.</p>	<p>ENSTROGA</p>	
<p>Sending commercial and promotional communications that includes:</p> <ul style="list-style-type: none"> - Sending marketing communications. - Promotion of our products. - Offering new products that may be of interest to the USER. 	<p>Identification data: Name and surnames.</p> <p>Contact information: address of the supply point, billing address, telephone numbers, and email.</p>	<p>Consent.</p>	<p>Contact forms.</p> <p>Contract concluded between the parties.</p>
<p>Customer service, including:</p> <ul style="list-style-type: none"> - Answering any questions submitted through our websites, contact emails, contact postal mail. - Resolving any complaints or claims that may arise as a result of the disagreement with the provision of the service, billing, or any other inconvenience that may arise. 	<p>Contact information: address of the supply point, billing address, telephone numbers, and email.</p> <p>Payment details: bank account / credit card number (provided the query / claim is about billing)</p>	<p>Consent.</p> <p>Fulfilment of a contractual relationship.</p> <p>Legal duty.</p>	<p>Contact forms.</p>
<p>Maintenance of updated deletion lists to avoid being contacted, if requested by the USER.</p>	<p>Identification data: Name and surnames.</p> <p>Contact information: address of the supply point, billing address, telephone numbers, and email.</p>	<p>Legal obligation:</p> <p>The GDPR enables us to keep your details on a deletion list, if you have asked us not to send you more commercial communications.</p>	<p>Contact forms.</p> <p>Contract concluded between the parties.</p>

The refusal to provide the requested personal data, or the delivery of inaccurate or incomplete data,

could cause the inability to provide the contracted services in an appropriate manner. YOU are responsible for the veracity of the data provided, as well as to communicate any modification thereof.

Regarding the policy that is carried out for the purpose of sending you commercial communications about other products or services of ENSTROGA, we inform you that once you have given your consent if you do not withdraw it, you may continue to receive communications of this type. In any case, we remind you that if you gave your consent you have the right to withdraw it at any time without it having any consequence on the services or products that you have hired or of which you are a beneficiary. You will find the necessary information to exercise your right to withdraw consent in the section entitled "Your rights".

If you have any questions regarding the purposes of the processing of your personal data or its legitimacy, you can contact the person responsible for the processing. You will find the data and contact channels in the first section.

7) Transfer or communication of your data

The personal data collected through electronic forms and questionnaires or, where appropriate, downloadable forms will not be transferred or communicated to third parties, except in the cases necessary for the development, control and fulfilment of the purposes previously expressed, in the cases foreseen, according to the Law, as well as in specific cases of which YOU will be informed.

In any case YOU are warned that in expressing consent, ENSTROGA allows the possibility of contracting the provision of certain services with third parties that may involve access or storage of your data, by the aforementioned third parties. In any case, this access will not be considered as a communication of the data by ENSTROGA towards the mentioned third parties, but as a mere provision of a service. In all these cases, ENSTROGA has signed legally enforceable data processing contracts with these third parties, where, among other terms, the purpose of access to data and security conditions is detailed.

If an external third party is based outside the European Economic Area (EEA) the processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

To process your application and assess the creditworthiness and stability of product, we will supply

your personal information to credit reference agencies (CRAs) at the point of acquisition and an ongoing thereafter. They will give us information about you, such as about your financial history, so that we can assess your credit profile, check your identity, manage your account, trace and recover debts and prevent criminal activity.

We will share information relating to your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail [here](#).

8) Data Update

In order that the existing data in our files, computer and / or paper records, always correspond to the current situation, we will try to keep them updated. So, for these purposes, YOU must make the changes, directly, when this is enabled or by communicating through reliable means, with the corresponding area or department of ENSTROGA.

YOU guarantee that the personal data provided to ENSTROGA is truthful and is responsible for communicating any modification so that, at all times, they respond to their current situation.

9) Data security.

In compliance with the legislation in force, ENSTROGA has adopted in its information system the technical and organizational measures legally required, in order to guarantee the security and confidentiality of the stored data, thus avoiding, as far as possible, its alteration, loss, treatment or unauthorized access.

Likewise and aware of the importance of your personal data, in case of violation of the security of personal data, ENSTROGA will inform the competent control authority, as well as commit to inform YOU of any situation that may have compromised the confidentiality and availability of your data.

10) Your rights

YOU may at any time exercise the rights recognized in the legislation, which are those listed below:

- **Right of access:** Consulting the personal data included in ENSTROGA files.
- **Right of rectification:** Requesting the modification of your personal data.
- **Right of opposition:** Requesting that personal data is not used.
- **Right to cancel / Right to be forgotten:** Requesting the deletion of personal data.
- **Right to limit treatment:** Limiting the processing of personal data in the permitted cases.
- **Portability right:** Receiving as well as transmitting to another data controller, in electronic format, the personal data provided to ENSTROGA, whenever YOU request so.

In order to exercise these rights with ENSTROGA, the following channels are made available to YOU:

- Regular mail to our offices: Alexandra House, 43 Alexandra Street, Nottingham, NG5 1AY. It is necessary that the interested party attach, along with their application, a photocopy of their passport or any other identification document.
- Email to DPO@enstroga.co.uk, indicating, along with your request, an address for the purposes of notifications, as well as a scanned copy of the passport or any other identification document.

Likewise YOU have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.