

Manx Gas and your personal data

When we supply energy or services to your home, the data controller is Manx Gas Limited.

This is our privacy notice for home energy supply and support services. It explains your statutory rights and how we collect and use your personal data. It describes the data processing activities that are carried out by Manx Gas in relation to our home energy supply and support services, the purposes for which these activities are performed and the legal bases that Manx Gas relies upon for these processing activities.

We may update this privacy notice from time to time to ensure it is always up to date and accurate. Any changes we may make to our privacy notice will be posted on this page, and we will communicate any significant changes to you.

You can contact Manx Gas's data protection officer by writing to The Data Protection Officer, Manx Gas Limited, Murdoch House, South Quay, Douglas, Isle of Man, IM1 5PA. You can also contact our data protection officer at privacy@manxgas.co.im.

2. Personal data we collect

We collect the following types of personal data:

- **Your contact details and the contact details of people associated with your account:**
Information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your account or order.
- **Account information and details of other people linked to your account:**
Information about your account with Manx Gas including your login details for our customer e-bill portal, websites, date of birth, unique account number, contract details, household details, property type, nominees, executors, or people with a power of attorney and their details, or someone else set up to pay your bill, meter details, energy use and consumption pattern, tariff details, complaints details, incident details, appointment details, and notes added to your account.
- **Vulnerability information:**
Information that allows us to understand whether you are in a vulnerable situation.
- **Audio and video recordings, and contemporaneous notes:**
Recordings of telephone calls, records of site visits by our field operations teams and revenue protection teams.
- **Financial information:**
information that you provide that allows us to understand your creditworthiness and financial position.
- **Transaction and payment information:**
Bank account details you provide to make payment for the products and services you purchase from us. If you pay someone else's bill, we will have a copy of your payment information. If someone else pays your bill, we will have a copy of their information linked with your account.
- **Account history and purchase history:**
Records relating to the products and services which you have purchased or used.
- **Responses to service improvement surveys:**
Including records of any surveys

- Records of your discussions with our customer support teams, including call recordings, emails and chats made via our e-bill portal:**
 When you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes when you send us emails, phone our support team or contact us via our e-bill portal or through social media such as through Twitter or on Facebook.
- How you use websites and e-bill portal:**
 We use technology such as cookies (subject to your cookie preferences) when you use our websites or e-bill portal, we collect information about the pages you look at and how you use them.
- Location information:**
 Your smart device or computer's IP address may tell us an approximate location when you connect to our websites but this will be no more precise than the city or country you are using your device in.
- Device and machine information:**
 Information about the computer hardware and software or on your smart device that is used to connect or communicate with us.
- Exercising your rights:**
 If you exercise any of your statutory rights under data protection law, we will keep a record of this and how we respond.

You are not required to provide to us any of the personal data described above, however, we may not be able to supply you with home energy and you may not be able to purchase our products and services if you do not do so.

3. What we use your personal data for and why.

3.1 *Where we process your personal data because of our contract.*

We process these items of your personal data to enter or fulfil the contract between us, including:

Reason or purpose	Personal data used
Supply you with home energy, provide our services to you and maintain your account (including for quality assurance purposes, and handling any complaints you might make)	All personal information we collect as listed in Section 2
Take payment for home energy supplied and any products and services you have used or requested along with the recovery of debt.	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Financial information Transaction and payment information Delivery information Purchase and account history Location information
Deliver products to you, install, service or maintain your appliances, provide emergency services and service contract services.	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account.
Perform credit checks at your request when purchasing products and services	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account

	<ul style="list-style-type: none"> • Financial information • Account information and details of other people linked to your account • Transaction and payment information
To deliver service communications (such as bills), and tailoring those communications to your circumstances	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Transaction and payment information
Answer your complaints or questions	<ul style="list-style-type: none"> • The personal data which is necessary for us to deal with your complaint, which will depend on the nature of your complaint and your contact preferences. • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Transaction and payment information • Purchase and account history
Showing you your energy consumption	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account

3.2 Where we process your personal data because we're legally obliged to

We process these items of your personal data because we have a legal obligation to, including:

Reason or purpose	Personal data used
Attending to emergency situations (including gas leaks and reports of fumes)	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Vulnerability information when you have provided us with this information
Investigating misuse of your account, crime and fraud	<ul style="list-style-type: none"> • The personal data which is necessary for us to investigate the issue, which will depend on the nature of the problem. At a minimum, this will include your name and contact information and information about your account and transaction history.
Comply with regulatory requirements	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Transaction and payment information • Anti-fraud information • Vulnerability information • Purchase and account history • Records of your discussions with our customer support teams • Audio and video recordings, and contemporaneous notes
Understand the information we hold to ensure compliance with data protection legislation	All personal information we collect as listed in Section 2

Internal and statutory audits	All personal information we collect as listed in Section 2
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3.3 Where we process your personal data because we have a legitimate interest to.

We process these items of your personal data because we have a legitimate interest to do so.

We process the following categories of personal data, including:

Reason or purpose	Personal data used
Maintain and improve our products and services, e.g. tariffs and tariff setting, improve customer service, improve energy efficiency, optimise business processes, quality assurance purposes, support efficient management of our staff, analyse performance of web pages and provide relevant content to you	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Transaction and payment information Purchase and account history How you use our websites and e-bill portal Location information Device and machine information Responses to service improvement surveys
Look after customers who have a vulnerability(e.g. if you have requested to be put on the Priority Services Register)	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Vulnerability information
Develop new products and services	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Purchase and account history
Assess which of our products and services that may be of interest to you, e.g. To understand regional demographics and take up, tailor offers and recommendations to customers' needs and reward loyal customers	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Transaction and payment information Purchase and account history Advertising and direct marketing preferences and responses
Direct marketing. If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to because of law. However, we will never send you direct marketing where you have opted out of receiving direct marketing communications	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account How you use our websites and e-bill portal Advertising and direct marketing preference and responses
For market research purposes, e.g. to understand how you use our products and services or how we might improve them	<ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account Transaction and payment information

	<ul style="list-style-type: none"> • Purchase and account history • Responses to service improvement surveys, • How you use our websites and e-bill portal • Device and machine information
Management information reporting	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Purchase and account history • How you use our websites and e-bill portal • Location information • Device and machine information
Protection of our staff	All personal information we collect as listed in Section 2
Staff training	All personal information we collect as listed in Section
For the establishment, exercise or defence of legal claims	All personal information we collect as listed in Section 2
Maintain accuracy and relevance of your data	All personal information we collect as listed in Section 2
Testing and development of our IT systems	All personal information we collect as listed in Section 2

3.4 Where we process your personal data because you have allowed us to:

We may process these items of your personal data when you have provided your consent to the processing.

You may revoke your consent at any point:

Reason or purpose	Personal data used
Direct marketing	<ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account

3.5 Where we process your personal data so you can't be identified any more

We may anonymise and aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our web sites, and developing new products and services.

4. Sources we collect your personal data from:

We will collect personal data from a number of sources. These include:

Directly from you:

When you set up an account with us, purchase products or services from us, submit information via our websites or e-bill portal, complete forms we provide to you, enter our competitions and promotions, make a claim, make a complaint, exercise your statutory rights, contact us by phone, email or communicate with us.

Our website and e-bill portal:

We collect information about how you use them and any devices you use to connect to them.

Other companies we work with:

Provide us with information to help us deliver our products and services to you. These include:

- **Companies in the same group of companies as us (Manx Gas, Guernsey Gas, Jersey Gas):** who may provide relevant information about the products and services bought from them.
- **Debt collection agencies.**
- **Credit and Anti-fraud reference agencies:**
Provide us with information about your transaction and claim history and credit history.
- **Social media:**
information that you submit to our social media accounts.
- **Housing associations and developers, including local authorities and social housing providers:**
Provide us with tenants' information, to enable us to make contact about their energy supply.
- **Other people linked to your account:**
If someone pays your bill on your behalf, or you are set up to pay someone else's bill, we may obtain information about you from them.
- **Public registers:**
Such as the Land Registry provide us with information about your property.

5. Who we share your personal data with

We never sell your data to a third party for their own marketing use.

We share personal data with the following categories of third parties.

Who	Examples
Companies in the same group of companies as us	Manx Gas, Jersey Gas, Guernsey Gas
Any party approved by you	A credit reference or finance company, if you want to take out a Credit agreement or boiler leasing agreement
Delivery companies	Print and Mail fulfilment and e-billing <ul style="list-style-type: none"> • Swiss Post Solutions • Isle of Man Post Office
Credit and Anti-fraud reference agencies	If you want to take out a credit agreement or boiler leasing agreement <ul style="list-style-type: none"> • Equifax
To comply with financial audit regulations	<ul style="list-style-type: none"> • Ernst & Young
Gas Industry supervisory bodies	Gas Safe Register as part of a gas safety investigation
The Government or our Regulators	<p>Isle of Man Government Isle of Man Government Office of Fair Trading and Debt Counselling Service Isle of Man Information Commissioner's Office</p> <p>If you raise a dispute or complaint to be reviewed by the Isle of Man Government Office of Fair Trading, we may share information such as your contact details, meter readings, payments,</p>

	transactions and equipment in order to resolve your complaint.
Companies that help us run our business, support our IT infrastructure and websites to further understand our customers	<p>Manx Telecom – to provide data centre services</p> <p>Inoapps – to provide data centre services and application support for customer management and billing</p> <p>Swiss Post Solutions – to provide e-billing solutions and customer e-bill portal</p> <p>Key IVR – to provide secure card payment services.</p> <p>Rant & Rave – to manage customer insights into services we have provided.</p>

6. Direct Marketing

Email, SMS, post and telephone marketing:

If you have not consented to receiving direct marketing communications, we will only send these communications to you when permitted to do so by law, but in all circumstances we will respect your marketing preferences which you set when you first create your account with us (or you first deal with us), or which you update from time to time.

When you call Manx Gas we may also provide you with information about products and services we believe you may be interested in.

7. Direct Marketing & Advertising on websites and e-bill portal

The details here provide a high level overview of how and where we capture and / or use personal data on our own and third party websites and applications.

Websites and e-bill portal

When you visit any of our websites or use our e-bill portal you will always be provided with access to the site's or application's own privacy notice and cookie policy. Our aim is to ensure that our websites and mobile applications are always working optimally for those who use them.

When you visit our websites and you are not logged in i.e. you are an anonymous visitor, we may use cookies and similar technologies (in accordance with your cookie preferences) to track anonymously details such as response times, the pages you view and the functionality you use. No individual is uniquely identifiable from this data and it is used purely to enable us to constantly review and improve these services.

Any adverts you may see whilst using the website anonymously will be generic in nature i.e. it will not use any personal data to 'personalise' the advert to you.

If you chose to complete an online application, enquiry or other form then the form will set out explicitly how the data you provide will be used.

When you are logged in to our e-bill portal we will use cookies and similar technologies - in accordance with your cookie preferences - to track your use of the site or application. In this instance some data may be recorded to your record to enable us to provide the best ongoing service to you.

8. Transferring your personal data internationally

Manx Gas uses third parties located in the Isle of Man, Jersey, Guernsey, the UK and other countries to help us run our business. As a result, personal data may be transferred outside the countries where

we and our customers are located. This includes countries outside the European Economic Area ("EEA") and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully.

Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

9. How long we keep personal data for

We will keep your personal data for as long as necessary in order to achieve the processing purposes.

10. Your rights in relation to your personal data

You may have the following rights in relation to your personal data:

- the right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the blocking or deletion of your personal data in some circumstances;
- the right to request that we port elements of your data either to you or another service provider;
- the right to object to us processing your personal data (where we do so only because you have consented, or because we are using automated means to make decisions that affect you); and
- the right to withdraw your consent.

You only have the benefits of some of the above rights in limited circumstances, which depend on the legal reason why we collected your personal data.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details below.

11. Getting in touch

If you have any privacy-related questions or comments, please contact Manx Gas's Data Protection Officer by writing to The Data Protection Officer, Manx Gas Limited, Murdoch House, South Quay, Douglas, Isle of Man, IM1 5PA

You can also contact our data protection officer at privacy@manxgas.co.im

We are here to help and encourage you to contact us to resolve any complaint you may have in first instance

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