

# Customer Privacy Policy.

Policy ref: eE-CPP

# Table of Contents.


1. Who we are
2. Scope of this notice.
3. Information we collect.
4. How we obtain information.
5. Purposes and lawful bases.
6. Legitimate interests and professional contact information.
7. AI-assisted processing and human oversight.
8. Sales and marketing communications.
9. Sharing personal information.
10. International transfers.
11. Retention.
12. Security and incident management.
13. Your rights.
14. Website analytics and cookies.

# Who we are.

eEnergy Group plc ("eEnergy", "we", "us" or "our") is the controller of the personal information described in this Customer & Prospect Privacy Notice. Our correspondence address is Mary Sheridan House, 11–19 St Thomas Street, London SE1 9RY.

For privacy enquiries, or to exercise your data protection rights, please contact our HR / People Team at hr@eenergy.com. The team coordinates requests with relevant departments.

# Scope of this notice.

This notice applies to identifiable individuals who are customers, prospective customers, professional contacts or representatives of organisations that deal or may deal with eEnergy, including sole traders and individual business owners. It explains information collected directly and obtained from third-party sources.

This notice is distinct from employee privacy information and any separate website cookie notice.

# Information we collect.

We may process:

- **Business contact information:** name, job title, employer, business email address, business telephone number and business address.
- **Professional information:** publicly available professional profiles, professional roles and responsibilities, business interests and information relevant to potential business projects.
- **Customer and project information:** information relating to enquiries, quotations, customer accounts, projects, business requirements and our commercial relationship with you.
- **Communications and preferences:** records of emails, calls and meetings, correspondence, marketing preferences, objections and opt-out requests.
- **Website and marketing engagement information:** online identifiers and website usage information where applicable, and email engagement information such as whether a marketing email is opened or a link is clicked, where tracking is enabled.

We seek to use information relevant to a professional relationship and do not intentionally source special category personal data for routine prospecting.

# How we obtain information.

We obtain information directly from individuals who contact us, complete website forms, request quotations, communicate with our teams, request information or engage with us in business activities. We may also receive information from other eEnergy group companies.

For business development and marketing, we may also use he approved business platform Clay, and other third-party sources to identify prospective business contacts, and to enrich existing customer and prospect records. Sources identified for this activity include publicly available business websites and directories, LinkedIn and other professional networking platforms. Existing records may be uploaded to Clay for research or enrichment. Relevant results may be managed in Salesforce.

Where information is obtained from a source other than you, we will provide information about the source from which the personal information originated and, where applicable, whether it came from publicly accessible sources.

Depending on the information concerned, this may include the name of the platform, directory, website, data provider or other source from which the information was obtained. Where information is obtained through a third-party platform or provider, we will identify the underlying source where this information is available to us. However, the original source from which an individual provider obtained the information may not always be available to us.

We aim to provide the privacy information required by Article 14 UK GDPR within the applicable period, normally within one month or at our first communication if earlier, unless an exception applies. Our website publishes this notice, and initial prospect communications include a link to it.

# Purposes.

We process personal information, where applicable, to:

- Respond to enquiries and quotation requests
- Communicate with customers and professional contacts
- Manage customer accounts, contractual relationships and projects
- Identify prospective business customers and relevant business contacts
- Obtain, verify and maintain accurate business contact records
- Conduct business development and business-to-business marketing
- Manage communications, marketing preferences and objections
- Understand the effectiveness of marketing campaigns and assess email engagement where tracking is enabled
- Operate, protect and improve our systems and business processes
- Comply with legal and regulatory obligations and establish, exercise or defend legal claims where necessary

We use personal information only for purposes that are lawful and compatible with the circumstances in which it was obtained.

We rely on the following lawful bases under Article 6 UK GDPR, depending on the purpose of the processing and the circumstances:

- **Responding to enquiries, quotation requests and pre-contractual requests:** taking steps at the request of the individual before entering into a contract, where the individual is the prospective contracting party and the processing is necessary for that purpose. Where the individual is acting on behalf of an organisation, a different lawful basis may apply.
- **Managing customer accounts, contractual relationships and projects:** performance of a contract where the individual is a party to that contract and the processing is necessary for its performance. Where personal information relates to a representative of a customer organisation, we may rely on legitimate interests where appropriate.
- **Identifying prospective business customers, business contact research, data enrichment, data verification and business-to-business marketing:** legitimate interests, where we have assessed that our interests are not overridden by the interests, rights or freedoms of the individuals concerned.
- **Maintaining professional contact records and managing business relationships:** legitimate interests, where the processing is necessary and proportionate to these purposes.
- **Operating, protecting and improving our systems and business processes:** legitimate interests where appropriate and, where applicable, compliance with a legal obligation.
- **Complying with legal and regulatory obligations:** compliance with a legal obligation where the processing is necessary to meet an obligation imposed on us by law.
- **Managing marketing preferences, objections and suppression records:** legitimate interests where necessary to maintain and respect marketing preferences and objections, and to demonstrate compliance with applicable requirements.
- **Email engagement tracking, website analytics and other tracking technologies:** the lawful basis applicable to the relevant processing, taking account of the purpose, the technology used and any consent required under applicable data protection and electronic communications law.
- **Processing based on consent:** consent where we rely on consent as the lawful basis under UK GDPR. Where consent is required under applicable electronic communications law, we will also obtain and maintain that consent as required.

The lawful basis applicable to a particular activity will depend on the circumstances. Where we rely on legitimate interests, we assess the purpose of the processing, its necessity and proportionality, the reasonable expectations of individuals, the potential impact on their rights and freedoms, and the safeguards available.

## Lawful Bases.

We rely on the lawful basis appropriate to the purpose and circumstances of the processing. These may include:

- **Legitimate interests:** for relevant business-to-business prospecting and marketing, managing professional relationships, maintaining accurate business contact records, improving business processes and protecting our systems, where these interests are not overridden by individuals' rights and freedoms.
- **Contract:** where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
- **Legal obligation:** where processing is necessary to comply with a legal obligation.
- **Consent:** where consent is required by law or where we have chosen to rely on consent for a particular activity.

Where we rely on legitimate interests, we consider the purpose of the processing, whether it is necessary, the reasonable expectations of the individuals concerned, the potential impact on their rights and freedoms and the safeguards available.
You have the right to object to the processing of your personal data for direct marketing at any time. If you object, we will stop processing your personal data for that purpose.

## Legitimate interests and professional contact information.

When obtaining information from Clay and other third-party sources, we use professional business information, such as names, roles, employers, business contact details and publicly available professional profiles. We use this information for relevant business-to-business prospecting, data verification and marketing, subject to applicable laws and individual rights. We do not intentionally source private or special-category information for these activities.

We seek to use information that is relevant to a professional relationship and proportionate to our business development activities. Public availability of information does not, by itself, mean that every use of that information is appropriate or lawful.

Where we rely on legitimate interests, we assess whether our interests are legitimate, whether the processing is necessary to achieve those interests and whether they are overridden by the interests, rights or freedoms of the individuals concerned. We consider the source of the information, reasonable expectations, potential impacts and appropriate safeguards.

## AI-assisted processing and human oversight.

We may use approved tools, including Clay, to undertake professional contact research, enrichment and organisation of information.

Employees review information and retain responsibility for decisions and communications. We do not use tools or platforms to make solely automated decisions about individuals that produce legal or similarly significant effects.

Use of approved AI tools is subject to eEnergy's AI Acceptable Use Policy, including appropriate business licensing, confidentiality, data minimisation, accuracy checks and human oversight.

## Sales and marketing communications.

We may contact relevant business representatives by business email, telephone or LinkedIn about eEnergy's services. We comply with UK GDPR, the Privacy and Electronic Communications Regulations (PECR) and applicable platform requirements. Public availability of a contact detail, or its presence in Clay and other third-party providers, does not itself authorise marketing.

The rules and our approach, differs according to the communication channel and the type of recipient. For example, PECR's consent requirements for unsolicited marketing emails differ between corporate subscribers and individual subscribers. Our prospecting and marketing activities are intended to target corporate subscribers. We take steps to ensure that recipient categories are appropriately identified before marketing communications are sent.

Where marketing is directed to corporate subscribers, we identify ourselves appropriately and provide a valid means of opting out. We respect objections to direct marketing and maintain suppression records to help ensure that individuals and businesses who have opted out are excluded from future relevant marketing.

For unsolicited marketing emails to sole traders and other individual subscribers, eEnergy's stated practice is to require valid consent. Consent records, including when and how consent was obtained, are maintained in Salesforce. Individuals may withdraw consent or object to direct marketing at any time.

Sales and Marketing teams manually record marketing opt-outs in Salesforce and exclude those contacts from future marketing. Limited suppression information may be retained to honour objections.

We maintain internal do-not-call records; the operation of Telephone Preference Service (TPS) and Corporate TPS screening remains subject to internal confirmation.

## Email marketing and engagement

Where enabled, our marketing communications may use technologies to record whether an email is opened, or a link is clicked.

We may use this information to understand engagement, assess campaign effectiveness and send relevant follow-up communications, including to recipients who have not engaged with an earlier message, subject to applicable law.

We use these technologies only were permitted by applicable data protection and electronic communications law, obtaining consent where required.

You may opt out / unsubscribe from eEnergy newsletters or email campaigns using the unsubscribe link or contact marketing.comms@eenergy.com to update your preferences.

Unsubscribing stops future marketing emails from the relevant campaign. We may retain limited information about your preference or objection to ensure that it continues to be respected. Previously collected engagement information may be retained where we have a lawful basis to do so and retention remains appropriate. Unsubscribing from marketing emails does not, by itself, disable unrelated website tracking.

## Sharing personal information.

Access to Salesforce customer and prospect records is restricted by role to authorised Sales, Marketing, Senior Management and Customer Service / Delivery personnel.

We may share relevant information with other eEnergy group companies for business administration, customer relationship management, sales and project delivery, subject to the applicable responsibilities of those entities.

We also use service providers including Salesforce (customer relationship management) and Clay (business contact research and enrichment). We may also share relevant personal information with other categories of external recipients such as IT, hosting and support providers and parties needed for service delivery, where necessary for the purposes described in this notice. We will update this notice where necessary if our data-sharing arrangements change materially.

Where another organisation processes personal information on our behalf, we put appropriate contractual, confidentiality and security protections in place. Where another organisation acts as an independent controller, its own responsibilities and privacy information may also apply.

We may also disclose personal information where required by law, to establish or defend legal claims, or in connection with a relevant corporate transaction, subject to applicable legal requirements.

# International transfers.

Personal information may be processed or accessed in countries outside the United Kingdom, depending on the arrangements of our suppliers and service providers.

Where a transfer of personal information outside the UK is subject to UK data protection transfer restrictions, we will ensure that an applicable transfer mechanism or safeguard is in place, such as UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to the relevant standard contractual clauses, as appropriate.

We will also undertake any assessment required by applicable law and implement supplementary safeguards where necessary. Information about the applicable safeguards may be requested by contacting us using the details set out in this notice.

# How long we retain personal information.

We retain personal information only for as long as reasonably necessary for the purposes for which it is processed, taking account of legal, regulatory, operational and business requirements.

Our intended retention periods are:

- **Prospective business contacts:** up to 24 months from the last meaningful interaction or relevant business activity, subject to periodic review and earlier deletion where appropriate.
- **Customer records:** up to seven years after the business relationship ends, where justified by contractual, operational, accounting or legal requirements.
- **Marketing objections and suppression records:** for as long as reasonably necessary to ensure that marketing preferences and objections continue to be respected.

Different records may require different retention periods. Where appropriate, we delete or anonymise information when it is no longer needed.

# Security and incident management.

We use organisational and technical controls designed to protect personal information against unauthorised access, including individual user accounts and passwords, multi-factor authentication, role-based access restrictions, company-managed devices, employee data protection or cybersecurity training and data breach reporting procedures. We also have a pro-active technical team monitoring our systems for potential vulnerabilities 24/7.

Employees report suspected personal data breaches to the HR / People Team at hr@eenergy.com, which coordinates assessment and escalation with relevant functions. Notifiable incidents are reported to the relevant authority and affected individuals where required by law.

# Your rights.

Subject to applicable conditions and exemptions, you may have rights to:

- Access your personal information.
- Have inaccurate or incomplete personal information rectified.
- Request erasure of your personal information.
- Request restriction of processing.
- Object to processing based on legitimate interests or other applicable grounds.
- Receive certain personal information in a portable format where the right to data portability applies.
- Withdraw consent at any time where we rely on consent, without affecting the lawfulness of processing before withdrawal.
- Exercise rights relating to certain solely automated decisions, where applicable.

**You have an absolute right to object to processing for direct marketing.** You may withdraw it at any time without affecting earlier lawful processing.

Our Data Protection Officer is Abi Wall.

Please contact hr@eenergy.com to exercise your rights. We normally respond within one month, subject to permitted extensions. You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk.

Access to your personal information. Under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, you may request a copy of the personal information we hold about you, subject to applicable exemptions. Please email hr@eenergy.com or write to eEnergy Group plc, Mary Sheridan House, 11–19 St Thomas Street, London SE1 9RY, United Kingdom. We normally respond within one calendar month, subject to permitted extensions.

# Website analytics and cookies.

Our website uses analytics tools to understand visitor engagement and improve the website. Information about the specific technologies used, their purposes, any consent required and available controls should be set out in our website cookie information. The analytics provider and cookie consent arrangements are awaiting confirmation.

# Changes and review.

This notice will be reviewed annually and whenever material changes occur to our processing, suppliers, marketing activities or legal requirements. Updated versions will be made available through our website.

# Document Revisions.

| Policy Version | Last reviewed date/by: | | Next review date: |
|---|---|---|---|
| 02 | 30th October 2026 | Gabriella Stacey | 16th October 2027 |
| | | | |