

# **Privacy Statement**

iChoosr is an independent expert in group buying schemes in different countries across the globe. For our UK schemes support is delivered from the UK and additional resources located in other countries (within the EU) to help us deliver the schemes.

At iChoosr we value your privacy highly and will treat the information you entrust to us with care. In this Privacy Statement we explain what personal information we collect and how we use it, how we process the information, how we work with Community Leaders (your local authority, trade union, membership organisation, etc.), and what your rights are. In processing your personal information, we adhere to the legal requirements placed on us under the Data Protection Act 2018 and the General Data Protection Regulation.

This Statement describes how iChoosr will collect and use the personal information which you provide to us when using our website(s) and services. You can consent to this through our cookie banner and by accepting the processing of information when you register for our services.

Last updated: November 2020.

# What personal information do we collect?

Personal information is information by which we can identify you or that may be linked to you. When you register with iChoosr you provide us with information and some of that information is personal information. The data that we collect is necessary for us to be able to provide you with a personal offer. We collect the following personal information:

- Title;
- Name;
- Address;
- Telephone number;
- E-mail address (if applicable);
- Date of birth (if you choose to accept your offer);
- Bank account number and name of the account holder (if you choose to accept your offer).

## For what purposes do we process your personal information?

In order to organise our schemes and to be able to present you with a personal offer, we process your personal information in several steps. Firstly, we collect the information that is necessary for us to organise a scheme, so that suppliers who take part in the auction can determine their best offer. Suppliers do not receive any personal information at this stage, only anonymised data such as the total number of registrants and the geographical spread of registrants. Once the result of an auction has been determined you will receive a personal offer from the winning supplier through us.

Only when you decide to accept the offer that you have received, will you enter into an agreement with the winning supplier. We will always ask for your explicit acceptance of your offer. When you decide to accept your offer, we will proceed by sharing your data with the winning supplier so that they may contact you. Your data is not shared with a supplier unless you enter into an agreement (in other words, only if you accept your offer).

In order to improve our schemes and service to you, we may ask you via telephone or e-mail to take part in a customer satisfaction survey. It is up to you to decide whether you would like to participate in the survey. We will also analyse your data as part of the collective in order to improve the way we run our schemes.

We process your personal data to the extent necessary for your participation in our schemes and to analyse and to improve our schemes and services.

When you register as a participant you will be included in the list of participants (the collective) and we will keep you updated about the scheme for which you have registered, e.g. to send you your personal offer and if required a few reminders. You will stay part of the collective, receiving updates, including offers, about future schemes from which you may benefit by accepting with a maximum of up to three schemes per year. We want to emphasise that no action will be taken automatically and the decision to accept or decline a proposal always rests with you. Additionally, we may alert you to other energy-related schemes that we organise, with a maximum of up to three schemes per year.

You can unsubscribe at any time, after which you will no longer receive messages from us. Unsubscribing may be done by clicking on the link in any of our emails to you. You may also call us or send us a letter. When you unsubscribe, you will no longer be included in the collective.

We will retain your information for as long as required in accordance with the purposes for which it was collected. When you unsubscribe, we will erase your personal details after a period of six months (necessary for administrative purposes). If you have not activated your subscription for a period of four years, your information will automatically be erased from our database.

## How will we communicate with you?

Primarily we will communicate with you via email, using the email address that you provide when you register. We might also send you a text message, for example when the decision period for the scheme you have registered for is about to end.

If you do not have internet access and you are registering through a Community Leader who provides this option, we will communicate with you via letter using the postal address that you provide when you register.

And of course, you may contact us via telephone or by using the contact form on our website whenever you have questions, want to change your personal details, or when you want to submit a request to us.

### Sharing your data

iChoosr organises schemes with Community Leaders (e.g. local authorities, unions, charities). When you register, we may exchange anonymised, statistical information with your Community Leader where this is necessary to run our schemes in an effective manner. In some cases, the Community Leader may also share non-personal data with us, e.g. pseudonymised membership numbers, for the sole purpose of us being able to verify who is eligible to take part in the collective, as we are required to do by the regulator Ofgem.

If we have a Data Sharing Agreement with a Community Leader and if you consent to it, we may also share limited personal information. This is for the sole purpose of the Community Leader providing relevant information to you, e.g. about other relevant services the Community Leader may offer. The Data Sharing Agreement ensures the continued safeguarding of your data. If you do not consent to us sharing your personal details with your Community Leader, we will only share anonymised information with them.

When you accept your offer, the winning supplier will receive your information from us so that they may execute the contract.

Other than this, the personal information you provide to us is not passed on to a third party, except where this is necessary in order to carry out the scheme. An example of this is a company that we ask to carry out a customer satisfaction survey. These third parties only work on our direct instructions, under a data processing agreement, and may not legally use your personal information for any other purposes. We will not share your data with any other third parties without your express consent, unless this is legally required.

## Where do we process your data?

All of our primary information services are provided from the EU/EEA, for example our databases are located in Frankfurt in Germany and Amsterdam in the Netherlands, and therefore covered by the GDPR. In some cases, and only to a limited extent, your information may also be processed outside of the EU/EEA. Where this is the case, we ensure that adequate safeguards are in place to ensure that your data is treated in accordance with the high standards of the GDPR and Data Protection Act requirements<sup>1</sup>.

Please rest assured that we always ensure that appropriate measures are in place to protect your privacy. We enter into agreements where this is required and work exclusively with US organisations if they are Privacy Shield certified.

#### iChoosr Websites

When you visit an iChoosr website you may choose to accept cookies. In choosing to accept cookies you can differentiate between several categories of cookies, some of which may process personal details. You can read more information about this in our cookie statement.

# Third party websites

This Privacy Statement only applies to the websites of iChoosr's schemes and is not applicable to third party websites connected to this website through hyperlinks. We cannot guarantee that these websites process personal details in a reliable or secure way. Before using such third party websites, we advise you to always read the privacy statement of that website in order to ensure that your personal details are treated and processed correctly.

## Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time. Changes will be published on this website. We therefore recommend that you consult this Privacy Statement regularly, so that you are aware of such changes. This privacy statement will never be modified to read that we may share or sell your personal information without either your explicit consent or without a contract between you and such a third party.

#### Your rights

When you take part in our schemes, you can send us a request to view, change, erase, or limit the personal information you have provided to us. You may also ask us to forward your information to another organisation. You may submit such a request through the contact form on our website or by writing to us. You can also view and change your personal details through the My Details page of your registration. When you want to request us to delete your information, you can do so via our contact form or by writing to us. Our address and a link to the contact form can be found at the bottom of this page.

When you submit a request to us, for example to delete your personal information, we may ask you to confirm your identity to us, for example by asking control questions concerning your registration.

### Information Commissioner's Office

Of course, we are here to help you when you have any complaints concerning the processing of your personal information. When you are not satisfied, you may also submit a complaint to the Information Commissioner's Office (<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>) to protest the processing of your personal information.

# When you have questions or requests

<sup>&</sup>lt;sup>1</sup> Please note that we will continue to protect your privacy through any changes that may arise as a result of the United Kingdom leaving the European Union ("Brexit") in accordance with <u>guidance issued by the Information</u> Commissioner's Office.

You can contact us in several ways:

### iChoosr:

- The Contact Form on our website: <a href="https://www.ichoosr.co.uk/contact/">https://www.ichoosr.co.uk/contact/</a>;
- Via email: info@ichoosr.co.uk;
- Via telephone: you can find the number of our free phone on the website, in your confirmation of registration email or your summary of registration letter;
- Via the 'My Details' page of your registration (link received in confirmation email);
- Via post: iChoosr Ltd., 1st Floor, 23 Princes Street, London, W1B 2LX

If you have any questions for iChoosr regarding this Privacy Statement, please direct them to our Privacy Officer on privacy@ichoosr.com.

## **Community Leader:**

Several Community Leaders may work together with iChoosr to organise a scheme. Please contact iChoosr so that we may direct you to your Community Leader. You can also contact your Community Leader directly.