

## Privacy Policy

At Boston Energy we are committed to protecting the privacy and accuracy of confidential information to the extent possible, subject to provisions of the UK law.

This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of our website, blog, or app.

### Information Collection and Use & Retention

While using our website, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person. For example this could be your name and contact details. Here are some examples we might use:

- Name
- Telephone number (including mobile)
- Email address
- Billing Address (Training only)
- Company Name (Training only)

### Why do we need your personal information?

We may need to use some information about you to:

- deliver services and support to you
- manage and promote those services we provide to you
- train and manage the employment of our workers who deliver those services
- carry out our licensing and regulatory duties
- provide commercial services
- provide non-commercial activities
- help with crime prevention and prosecuting offenders
- help investigate any worries or complaints you have about your services; and
- manage archived records for historical and research reasons

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We do not sell, trade or otherwise transfer your personal information to outside parties, nor do we offer third-party products or services on our website.

### **When you use our services**

We collect personal information because you have asked us to provide a Service and we use that information to process and deliver the service to you. If you choose not to provide this information we will not be able to provide the service you asked for.

We will also store that information in our records for use in the future should you contact us for other services. We only collect information which is relevant to providing services to you; and for communicating with you regarding those services.

We will share information such as your name, address and contact details across the organisation where required. If we have collected more specific information, or documentation relevant to a particular service you have requested, we may also share that information to other departments in the organisation when that information is needed to assess and provide other services.

We do this, to reduce the amount of information you will need to provide to us when you ask for additional services; and to help us locate information about your services easily and quickly to respond to your queries.

We will not share your information with any other third-party organisation or transfer it outside the European Union without your consent.

### **How the law allows us to use your personal information**

There are a number of legal reasons why we need to collect and use your personal information.

Generally we collect and use personal information where:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please contact us if you wish to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications

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to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **We only use what we need**

Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

If we don't need personal information we'll either keep you anonymous if we already have it for something else or we won't ask you for it. For example in a survey we may not need your contact details so we'll only collect your survey responses.

If we use your personal information for research and analysis, we'll always keep you anonymous or use a different name unless you've agreed that your personal information can be used for that research.

We don't sell your personal information to anyone else.

### **Sharing your data with third parties**

We respect your privacy and that's why we don't share any data with third parties for marketing purposes. However, we will pass your information to a limited number of third parties for the following reasons:

- Law Enforcement Agencies for legal or regulatory purposes including fraud prevention or apprehension of offenders

Where we have these arrangements there is always an agreement in place to make sure that the organisation complies with data protection law.

We'll often ensure a sharing agreement is in place before we share personal information to make sure we protect your privacy and comply with the law. Should we start a new processing or consider new systems to process your information we will usually complete a data privacy impact assessment (DPIA) to consider risks and mitigations to said risks.

Sometimes we have a legal duty to provide personal information to other organisations. For instance, we need to give it to courts if the court orders that we provide the information. We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy.

For all of these reasons the risk must be serious before we can override your right to privacy. If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

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We may still share your information if we believe the risk to others is serious enough to do so. There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect, retain or share data about you. Boston Energy do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we advise you to read the privacy policy of every website you visit.

### **Log Data**

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this. To find out more regarding this please see our Cookie Notice.

### **Data Retention**

Boston Energy will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### **Security**

We will take appropriate steps to make sure we hold records about you (on paper and electronically) in a secure way, including:

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- all employees who have access to your personal information or are associated with the handling of that information are obliged to respect the confidentiality of your personal information
- we will have put in place procedures and technologies to maintain the security of all personal information from the point of collection to the point of destruction

Some examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of the organisation could work on your information for us without ever knowing it was yours
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

Any transactions made on our website are processed through a gateway provider and are not stored or processed on our servers.

### Your rights

You can request a copy of the personal information that we hold about you at any time and we will arrange for a copy to be issued to you, free of charge, within 30 days. We may ask you for proof of your identity before we disclose any information, should this be necessary.

If you believe that the information, we hold about you is incorrect you can ask for it to be corrected.

If you believe we are processing your personal information without a legal basis, you can ask us to stop. You can also ask us to delete your personal information from our systems.

To action any of the above, please send an email to: [QC@bostonenergy.co.uk](mailto:QC@bostonenergy.co.uk)

### Changes To This Privacy Policy

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This Privacy Policy is effective as of 13/11/2024 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us or by placing a prominent notice on our website.

### Complaints

If, at any time, you feel that we haven't processed your data fairly or you're not satisfied with how we've handled your personal information, you can contact the Information Commissioners Office, who will look into this for you. For full details about how to share any concerns you may have, visit [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/)

### Contact Us

If you have any questions about this Privacy Policy, please contact us via email at [QC@bostonenergy.co.uk](mailto:QC@bostonenergy.co.uk)

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