

# Your privacy dashboard

Hello, we are Tonik Energy Limited (known by the name of “Tonik Energy” or just “Tonik”).

Here is a short summary of how we process and protect your data and respect your privacy. For further information please see our [full Privacy Policy](#) or click on the dynamic links in the table below

## Types of data we collect

- Contact details
- Account information
- Financial information
- Data about your energy usage
- Data that identifies you & other people
- Data on how you use Tonik Energy

[Tell me why](#)

## How we use your data

- To provide you with services to keep the lights on & keep you warm!
- To keep Tonik Energy running
- To help us improve Tonik Energy
- To give personalised member support and information
- To send you marketing messages (but only if you tell us to)

[How exactly?](#)

## Third Parties who process your data

The following are some of the services that help us keep Tonik Energy running by storing or processing your data:

- Energy services: National Grid, ECOES,
- Infrastructure: Microsoft
- Communications: Foehn, Mailchimp
- Financial: GoCardless, PayPoint, Creditstyle
- Analytics: Google Analytics
- Integrations: (by your request) Facebook
- Industry Partners: BP

[What do they do?](#)

## Know your rights

Your rights include

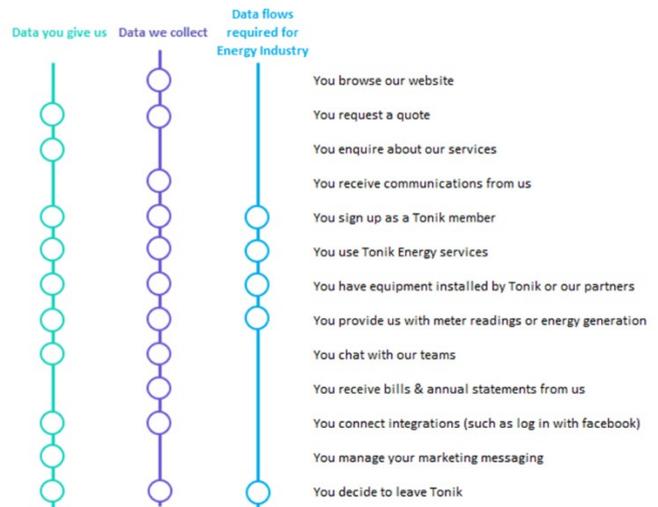
- Access information we hold on you
- Have your data corrected
- Opt-out of marketing communications
- Port your data to another service
- Be forgotten by Tonik
- Complain about us

[What can I do?](#)

## When and how we collect data

We collect data from people browsing our website, people chatting to us online, social media or on the phone, members of Tonik Energy and people who use our services such as refer a friend.

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by the energy industry. Here is a visual representation that explains when and how we do this.



[Is my data included?](#)

## We use cookies

- Why? We use necessary cookies to run and improve the service to you
- Our third-party service providers use cookies too, which they control
- You can turn off cookies but this will mean for example that we can't recognise you online or we can't resolve issues so efficiently

[How can I manage cookies?](#)

## How can you contact our team?

Telephone: 0333 3442686 or email us: [hello@tonikenergy.com](mailto:hello@tonikenergy.com)  
Our Data Protection Team can be contacted at [privacy@tonikenergy.com](mailto:privacy@tonikenergy.com)

# Tonik Energy Privacy Policy

At Tonik Energy we want to get to know you, but we want you to know that we are committed to protecting and respecting your privacy. This Privacy Policy explains how and why we use your personal data, to make sure you stay informed and can be confident about entrusting us with your data.

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## 1. Who are we?

We are Tonik Energy Limited (Company No. 9812673). We provide our members with access to 100% renewable electricity, sustainable green gas and the option to offset carbon emissions. Our aim is to connect our members to new technologies and innovative ways to power their home.

In this Privacy Policy, whenever you see the words 'we', 'us', 'our' it refers to Tonik Energy Limited.

How can you contact our team?

- Telephone: 0333 3442686
- Email: [hello@tonikenergy.com](mailto:hello@tonikenergy.com) or our Data Protection Officer can be contacted at [privacy@tonikenergy.com](mailto:privacy@tonikenergy.com)
- Post: Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT

We are registered as a data controller at the UK Information Commissioner's Office under number [ZA197616](#)

## 2. Our responsibilities

If you are a Tonik customer, if you use any of our products or services, if you've recently moved into a property that we supply, enquire about our services, take part in our market research activities, interact with us online, email, live chat, call or write to us, or just visit our website, this Privacy Policy applies to you and we act as the 'data controller' of your personal data. This means we determine how and why your personal data is processed.

If you are a supplier or a member of staff (current team member, job applicant or previous team member) we have created specific policies for you, and they will have been made available to you at the appropriate point in time. Tonik Energy is committed to ensuring the privacy and security of your personal data.

The following Privacy Policy sets out the personal data that we collect about you. This includes how and why we process your personal data, who we share it with, and lots of information about your rights and choices when it comes to the processing of your personal data.

We'll keep this Privacy Policy updated to show you all the things we do with your personal data. In certain circumstances we may also provide an extra privacy notice, which will always refer to this page.

## 3. Your responsibilities

- ✓ To read this Privacy Policy
- ✓ If you are our a Tonik customer, please also check the terms and conditions and policies between us as they may contain further details on how we collect and process your data.
- ✓ If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information to us, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

## 4. Use of any hyperlink and third-party views

Neither we nor any of our affiliates are responsible for the content of any other website, including any website through which you may have gained access to this site or to which you may gain access from this site. We do not accept any liability in connection with any such websites or links.

Where we provide a hyperlink to a third party's website, we do so because we believe in good faith that such a website contains or may contain material which is relevant to that on our site. Such a hyperlink does not signify that we or our affiliates have reviewed or approve of the connected third party's website or its contents – indeed in certain instances a hyperlink may connect you to a third party's website containing views contradictory to those expressed on our site or otherwise held by us or our affiliates.

Any views or opinions of third parties are the personal views of the individuals or organisations that provided them and do not necessarily reflect the opinion or views of us or any of our affiliates.

Where possible we have provided you with a link to their privacy policy and their main business website. Please note that whilst we make every effort to keep these links up to date, there may be instances where the organisation has changed their website and the link may no longer work. If that is the case then please find their main website and their privacy policy can usually be found linked in the footer at the bottom of the main webpage. Please also do not hesitate to alert us to this on our email address [privacy@tonikenergy.com](mailto:privacy@tonikenergy.com)

## 5. Protecting your personal data

Our Tonik Team follow strict security procedures to protect your personal information. This includes following certain guidelines (for example, checking your identity when you phone or email us).

We strongly recommend that you do not disclose any of your Tonik Energy Website login details to anyone.

Please always remember to logout of your account when you have finished using any of Tonik Energy's websites or online applications.

From time to time, our website, social media sites or documents may provide hypertext links to sites which are created by individuals and companies outside Tonik Energy. We do this if the site is relevant to the topic you're reading about. Whilst we always try to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, or the accuracy or relevance of the content on them.

### Protecting your data on shared devices

In order to ensure you are managing your data security as effectively as possible whilst using shared devices, the safest and most secure method is always to use a different user profile for each person using that device. This approach will ensure that all our account information, personal data, security settings, cookies and browser settings are kept completely separate.

If that is not possible or appropriate then it is important that whenever you have finished your browser session on any website then ensure that not only have you logged out of all your accounts, but also that you close down the browser completely before starting a new session by clicking the cross in the top right corner of the screen. You should also clear down the cookies at the end of your browsing session to ensure that your browser has 'forgotten' the information and cookies that have been provided within that browsing session.

Each browser handles cookies differently and as we don't know what browser you are using we are not in a position to provide detailed guidance on this. However, please find below links for invalidating or deleting cookies from the most popular browsers.

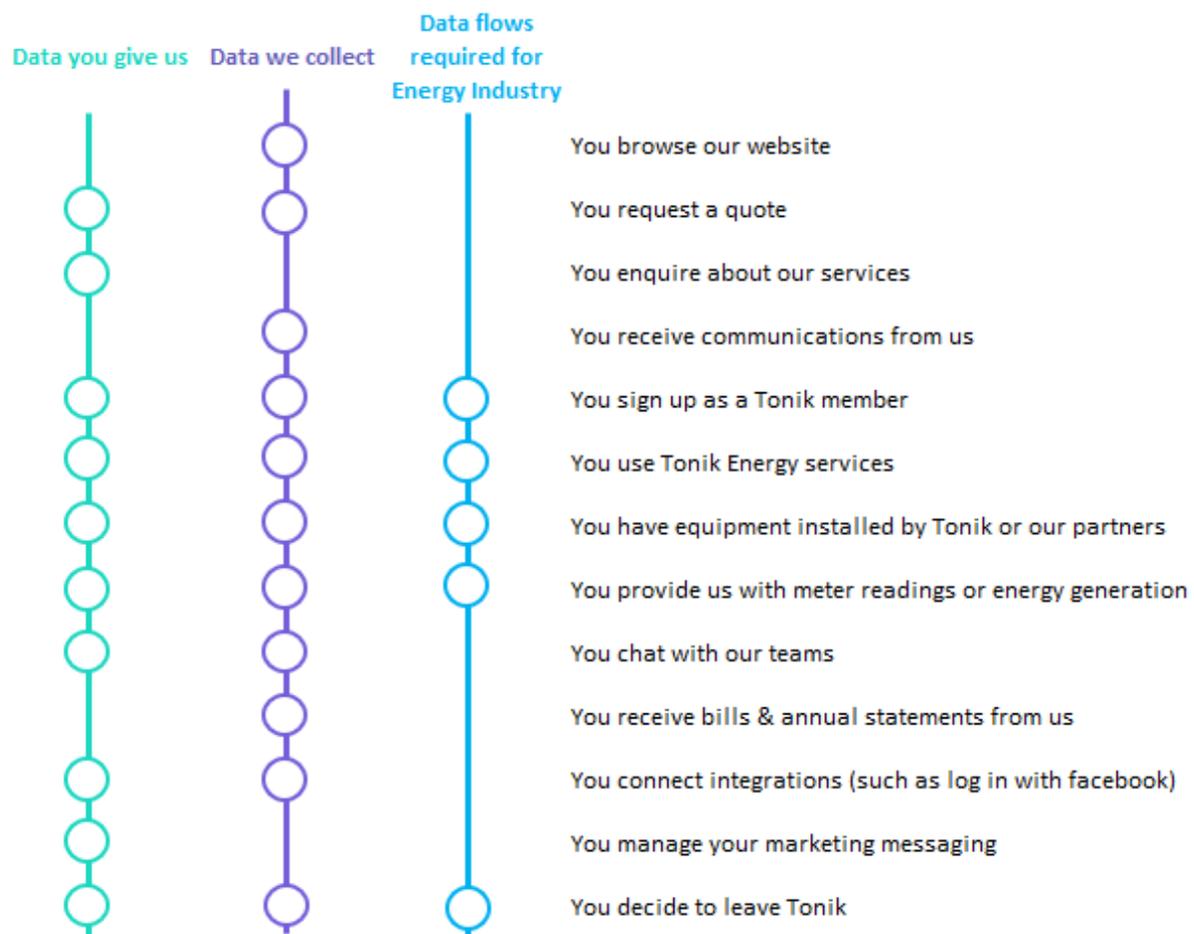
- [Google Chrome](#)
- [Internet Explorer \(Win 10/8.1\)](#)
- [Safari \(Mobile Devices\)](#)
- [Safari \(Mac\)](#)
- [Firefox](#)

## 6. When and how we collect your personal data

From the first moment you interact with Tonik, we are collecting data.

Sometimes you provide us with data, sometimes data about you is collected automatically and sometimes the energy industry or other organisations such as price comparison websites will provide us with data about you.

Included below is a visual representation we've created that explains when and why we do this. Some of the interactions illustrated may happen multiple times within your journey with us (e.g. you receive communications from us, or you enquire about service) or in a different order, so each journey will be unique, but we hope this will allow you to develop and understand where there are touch points and interactions are between your data, our business and the wider energy industry.



## 7. Types of data that we collect

'Personal data', or 'personal information', means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

	<p><b>Contact details and data that identifies you</b></p> <p>Your name, contact address, supply address, telephone number, email address, title, name and contact details of individuals authorised to access your account, your photograph (only where required for contractual reasons e.g for a FiT (Feed in Tariff application))</p>
	<p><b>Financial &amp; transaction information</b></p> <p>Your bank account number, sort code, bank details you provide to make payment for the products and services you purchase from us.</p> <p>Purchase and account history relating to the products and services which you have purchased or used, deliveries we have made to you. Information that allows us to understand your creditworthiness and financial position. 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.</p> <p>Please note we do not store any data that allows card payments to be made – this data is handled by our secure third party GoCardless who are PCIDSS compliant.</p>
	<p><b>Your account information</b></p> <p>Unique account number, date of birth, contract details, household details, previous address history, property type, tariff details, marketing preferences, incident details, dispatch appointment details, and notes added to your account.</p>
	<p><b>Our communication with you</b></p> <p>Records of your discussions with our members services team and other staff members, including call recordings, webchat and emails.</p> <p>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 Member Services Team or contact us via webchat or through social media such as through Twitter or on Facebook.</p> <p>Exercising your rights: if you exercise any of your statutory rights under data protection law, we will also keep a record of this and how we respond.</p>
	<p><b>Details of other people linked to your account</b></p> <p>Secondary account holders, nominees, executors, or people with a power of attorney and their details, or someone else set up to pay your bill, landlord or rental agency, housing association, previous supplier, proposed new supplier. People who you refer to us through our Refer-a-Friend scheme</p>
	<p><b>Data about your energy equipment, usage and property details</b></p> <p>Supply start date, meter and gas point numbers, meter details, solar photovoltaic details, electric vehicle charge points, property details, energy use, energy consumption level and pattern, energy generation, ancillary energy products (e.g. home battery) meter readings, meter technical details, tariff. Photos and images, but only if you share photo's or other images of your property with us or they are provided to us by a third party e.g. meter inspection engineer. If you have a smart meter installed at your property we'll also capture your energy consumption data (<a href="#">please see our FAQ on smart metering here</a>) .</p>
	<p><b>Technical data that identifies you</b></p> <p>Your IP address, login information, device type, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.</p>
	<p><b>Data on how you use Tonik services</b></p> <p>Information about how you use our website, products and services.</p> <p>Your URL clickstreams (the path you take through our websites), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.</p> <p>Responses to surveys, competitions and promotions, including records of any surveys you respond to or your entry into any competitions we run.</p>

	<p><b>Sensitive data</b></p> <p>If you feel that either yourself or a member of your household are in a vulnerable situation and need extra care (for example due to age, the presence of young children, health or medical conditions, disability or financial circumstances), we will collect the information you share with us so that we can fulfil your request appropriately or place you on the <a href="#">Priority Service Register</a> (PSR). Information passed to us by the Police, Crime Stoppers or Action Fraud.</p>
	<p><b>Other types of data</b></p> <p>We also use aggregated data, to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity. Any other information that you provide us with as part of your application</p>
	<p><b>Data about changes of circumstance</b></p> <p>Should your circumstances change, we may also ask for the following to allow us to service your account:</p> <ul style="list-style-type: none"> <li>• Documentation to support a change of name request such as a marriage certificate, decree absolute or deed poll.</li> <li>• Documentation to help us manage an account in cases requiring 'Property and financial affairs lasting power of attorney'.</li> <li>• Documentation to help us transfer or close an account in the case of a bereavement, such as death certificates, solicitors' correspondence, wills or probate documents.</li> </ul>
	<p><b>Enquiries or complaints</b></p> <p>We will obtain or request the following information if you contact us with an enquiry or complaint.</p> <ul style="list-style-type: none"> <li>• Any information that you disclose to us as part of your enquiry or complaint.</li> <li>• All the personal data which is necessary for us to deal with your enquiry, question or complaint, which will depend on the nature of your request. This may include: bills from your previous supplier, tenancy agreements, legal documentation, and copies of cheques or bank statements.</li> </ul>
	<p><b>Children's data</b></p> <p>Tonik is a business-to-consumer service directed to and intended for use only by those who own or rent their own homes. We do not target at children, and we do not knowingly collect any personal data from or about children with the exception of those who do have a household account with us or data for inclusion on the <a href="#">Priority Service Register</a> (PSR)</p>

## 8. How and why we use your data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

### To provide you with products & services and fulfil our contractual agreement with you

We process your personal data where is necessary for a contract that you have with us, or because we have asked you to take specific steps before entering into that contract.

Reason or purpose	Personal data used includes
Where requested by you we will provide you with a quotation for any of our products and services	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Account information and details of other people linked to your account</li><li>• Data about your energy equipment, usage and property details</li></ul>
To deliver our products and services to you	All personal information we collect as listed in Section 7
To collect payments for products and services, debt collection, manage your payment plans	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Account information and details of other people linked to your account</li><li>• Financial &amp; transaction information</li><li>• Data about your energy equipment, usage and property details</li><li>• Purchase and account history</li><li>• Location information</li><li>• Technical data</li></ul>
To deliver our service communications to you (such as bills, meter reading requests and annual statements), and tailor those communications to your circumstances	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Financial &amp; transaction information</li><li>• Data about your energy equipment, usage, generation and property details Data about changes of circumstances</li><li>• Vulnerability information</li></ul>
To manage and answer your complaints or questions. This includes communication media such as email, telephone, live online chat and social media.	All the personal data which is necessary for us to deal with your enquiry, question or complaint, which will depend on the nature of your request and your contact preferences
Showing you information about your energy consumption	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Your account information and details of other people linked to your account</li><li>• Data about your energy equipment, usage and property details</li></ul>
Providing industry flows and managing the forecasting and calculation of consumption data and validating invoices to ensure you are charged the right amount for your energy supply	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Your account information and details of other people linked to your account</li><li>• Data about your energy equipment, usage and property details</li></ul>

## To comply with our legal obligations (and for the establishment, exercise or defence of legal claims)

We process your personal data because we need to comply with a legal or regulatory obligation, including:

Reason or purpose	Personal data used includes
To comply with our UK Government obligations such as Smart metering, Warm Home Discount, Green Deal and ECO	<ul style="list-style-type: none"><li>Your contact details and the contact details of people associated with your account</li><li>Account information and details of other people linked to your account</li></ul>
To comply with our Ofgem obligations and to ensure we are meeting our licensing obligations. <a href="#">This includes raising awareness of smart meters</a>	All personal information we collect as listed in Section 7
To meet our data protection obligations; to verify your identity before we provide you with, or make amendments to information relating to your account, and to understand the information we hold about you. To manage our communications with you based on the TPS or MPS registers.	All personal information we collect as listed in Section 7
Attending to and handling emergency situations (including gas leaks)	<ul style="list-style-type: none"><li>Your contact details and the contact details of people associated with your account</li><li>Account information and details of other people linked to your account</li><li>Sensitive data (details from the PSR register)</li><li>Data about your energy usage</li></ul>
To resolve any disputes relating to your service usage with us, or your previous supplier	All the personal data which is necessary for us to deal with the dispute, which will depend on the nature of the dispute
For the detection and prevention of crime, including any investigations into potential fraudulent activity, such as energy theft. These requests may be coming from the Police or other government bodies/agencies. Please note that we may restrict the amount of information passed to the police or other governmental agencies if we feel the request is unnecessary or the data being asked for is disproportionate	The personal data which is necessary for us or the agencies 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.
To offer a priority service for vulnerable members, such as those with specific health or medical conditions so that we can meet our obligations under the Priority Services Register to ensure those who are vulnerable are treated as a priority if they lose service. This is to ensure we meet our obligations under our Electricity and Gas Supply License	<ul style="list-style-type: none"><li>Your contact details and the contact details of people associated with your account</li><li>Account information and details of other people linked to your account</li><li>Sensitive data (details from the PSR register)</li></ul>
To secure and protect our data processing network and infrastructure	All personal information we collect as listed in Section 7
Internal and statutory audits	All personal information we collect as listed in Section 7

## Information regarding our legal obligation in the roll out Smart Metering

It is extremely important for us to clarify that our Smart Meter Roll-out is not part of Tonik Energy's direct sales and marketing activity but a part of our legal obligation to you as a member.

The Government introduced the plan to ensure that smart meters will be rolled out as standard across the country by the end of 2020, and we have a legal obligation placed upon us to offer them to our members.

The rollout is being led by energy suppliers such as Tonik Energy Ltd, who have all been made responsible for installing smart metering equipment, and as we are not a smart meter installer we partner with providers such as National Grid Smart as our installation partner who may contact you on our behalf.

What are our obligations?

All gas and electricity suppliers are bound by strict conditions in their operating licence to "take all reasonable steps to roll out smart meters", to all their domestic and small business customers.

The licensing obligations we are referring to are found within both the Electricity and Gas Standard Licence Conditions and are referred to as our "Roll-out Duty". This Roll-out Duty requires suppliers such as Tonik Energy Ltd to take all reasonable steps to roll-out smart metering systems to domestic and smaller non-domestic premises.

The roll-out duties we have are as follows:

- Our electricity supply licence conditions states that, "The licensee must take all reasonable steps to ensure that a Smart Metering System is installed on or before 31 December 2020 at each Domestic Premises or Designated Premises in respect of which it is the Relevant Electricity Supplier"
- Our gas supply licence conditions states that, "The licensee must take all reasonable steps to ensure that a Smart Metering System is installed on or before 31 December 2020 at each Domestic Premises or Designated Premises in respect of which it is the Relevant Gas Supplier."

This is just one part of our smart metering obligations, there are also other responsibilities placed upon us such as a duty to report to the Secretary of State on the steps that we are taking and how our roll out is progressing.

As these obligations are incorporated in our operating license, this does mean that we have a legal obligation to offer smart metering to all our members.

Should you receive any communication regarding the Smart Meter roll out this does mean that it should not be considered to be unsolicited marketing as we have an obligation to make this offering to you.

As this activity is not classed as marketing, this also means that we are not required to check the TPS register before making any calls to you regarding the Smart Meter Roll Out.

However, once you have received a communication regarding Smart Metering, should you wish to opt out you are more than welcome to do so and you can do this by either selecting the unsubscribe option within the emails and text messages that you may receive, or by emailing us at [hello@tonikenergy.com](mailto:hello@tonikenergy.com).

## Because it is in our legitimate interests as a business to use your information:

We'll use your personal information if we consider it necessary for our legitimate business interests, or the legitimate interests of a third party, so that we can operate as an efficient and effective business and a responsible renewable energy supplier. This is subject to ensuring that those interests are not outweighed by your own rights and interests in relation to the relevant personal data and to that end where we wish to use legitimate interest we will carry out legitimate interest impact assessment for each of these.

We process the following categories of your personal data because we have a legitimate interest to do so, including:

Reason or purpose	Personal data used includes
<p>To maintain, develop and improve our Tonik Energy products and services e.g. for quality assurance purposes, to optimise our business processes and procedures, to support efficient business operations and the management and training of our staff, to analyse performance of webpages and provide you with relevant content</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Purchase and account history</li> <li>• Lifestyle and demographic insight information</li> <li>• How you use our online applications and websites</li> <li>• Location information</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Sensitive data (details from the PSR register)</li> <li>• Advertising and direct marketing preferences and responses</li> <li>• Technical data</li> </ul>
<p>Identify, and let you know about Tonik Energy products and services that may interest you e.g. to understand geographical and regional demographics, tariff information and energy consumption to tailor offers and recommendations to our member needs. This is only done to support our <a href="#">primary business objectives</a> of the provision of renewable energy and/or reducing your energy bills</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your Account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Purchase and account history</li> <li>• Lifestyle and demographic insight information</li> <li>• Advertising and direct marketing preferences and responses</li> <li>• Technical data</li> </ul>
<p>Develop new products and services e.g. new energy products and technology, new website or online functionality, or new tariffs</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Financial information</li> <li>• Purchase and account history</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Technical data</li> </ul>
<p>Management information reporting. This includes the creation of aggregated and anonymised information for further use It is important to be clear that for the use of Management Information, personal data is not accessed in its raw format directly by management. Our MI team create aggregated data <u>which</u> forms the bulk of such reporting ensuring that the data is not granular enough to identify individuals</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Technical data</li> </ul>
<p>For market research purposes, to help us continually improve our offering to our members</p>	<p>All personal information we collect as listed in Section 7</p>

To assess the financial vulnerability of our members, so that we can ensure you are on the best plan for your individual circumstances	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Financial &amp; transaction information</li> <li>• Sensitive data</li> <li>• Your account information and details of other people linked to your account</li> <li>• Sensitive information</li> </ul>
To provide you with advice, guidance and information on green energy solutions or tariffs that are appropriate to your circumstances	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your account information and details of other people linked to your account</li> <li>• Financial &amp; transaction information</li> <li>• Purchase and account history</li> <li>• Lifestyle and demographic insight information</li> <li>• Data about your energy equipment, usage, generation and property details</li> <li>• Sensitive information</li> <li>• Advertising and direct marketing preferences and responses</li> </ul>
<p>Direct Marketing.</p> <p>If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to by law.</p> <p>However, we will never send you direct marketing materials where you have opted out of receiving direct marketing communications</p>	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Your account information and details of other people linked to your account</li> <li>• How you use our online applications and websites</li> <li>• Advertising and direct marketing preferences and responses</li> </ul>
Protection of our staff	All personal information we collect as listed in Section 7
Staff training	All personal information we collect as listed in Section 7
For the establishment, exercise or defence of legal claims	All personal information we collect as listed in Section 7
Debt recovery relating to former Tonik Energy customers	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Financial information</li> <li>• Transaction and payment information</li> <li>• Delivery information</li> <li>• Purchase and account history</li> </ul>
To manage and maintain our refer-a-friend scheme	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your account</li> </ul>

## Where we have your consent:

This means that you have given clear consent for us to process your personal data for a specific purpose.

You can change your mind! If you have previously given us consent to process your data for a specific purpose you can freely withdraw such consent at any time. You can do this by emailing us at [hello@tonikenergy.com](mailto:hello@tonikenergy.com) or unsubscribing where appropriate.

If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights.

Please note, where you update your consent directly with us, this change may take up to 7 days to take effect.

Reason or purpose	Personal data used includes
To receive more frequent readings from your smart meter  For further information on how we can use your data please visit the Ofgem website <a href="https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-smart-prepayment-and-other-energy-meters/smart-meters-your-rights">https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-smart-prepayment-and-other-energy-meters/smart-meters-your-rights</a>	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Account information and details of other people linked to your account</li><li>• Data about your energy equipment, usage, generation and property details</li></ul>
Push notifications within our online applications (please note that revoking these permissions may require you to do this within your device e.g. disabling cookies)	<ul style="list-style-type: none"><li>• Your contact details and the contact details of people associated with your account</li><li>• Account information and details of other people linked to your account</li><li>• Technical data</li></ul>
Direct Marketing To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences	<ul style="list-style-type: none"><li>• Direct Marketing preferences</li></ul>

## Where we need to protect your or someone else's vital interests:

Reason or purpose	Personal data used includes
Where we have reason to believe that someone is at imminent risk of harm. In these circumstances we may alert third parties such as the Police or Social Services to check everyone's safety.	All the personal data which is necessary for us to deal with the concerns, this will depend on the nature of the concerns

## **Where we process your personal data so you cannot be identified any more**

We may anonymise and aggregate any of the personal data we hold (so that you can no longer be identified by it).

We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and developing new products and services.

## 9. Sources we collect your data from

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by the energy industry. This means that we will collect personal data from several sources. These include:

Source	Further information on what we collect
Directly from you	When you enquire about our services, become a Tonik customer, purchase products or services from us, submit information via our websites, provide us with meter readings, complete forms we provide to you, enter our competitions and promotions, make a complaint, exercise your statutory rights, contact us by phone, live chat email or communicate with us in any way such as via social media
Your previous energy provider	We may collect information from your previous energy provider about meter readings, metering details, energy consumption and generation, PSR status and information regarding your transactions. This may include receiving your data in cases where your previous supplier ceases trading, and we are chosen to take on your supply
Industry registers and data flows	Industry registers and data flows provide us with details of your metering and energy consumption. This includes ECOES, Xoserve and the DCC
Other people who are 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
Price Comparison Websites (PCW)	Your personal data can be passed onto us from price comparison websites and related third-party sellers such as bill management or energy flipping sites should you choose to interact with them to generate a quote, or open up an account with us
Other companies' apps and products	They provide us with information if you connect them to our products or services. An example of this would be social media platforms
Our website and other online or mobile applications	We collect information about how you use them and any smart devices you connect to them.
Smart devices such as smart meters, solar panels and other devices that we provide to you or that you connect to your account such as IoT devices	We collect information about how you use them, your energy consumption and the health of the equipment.
Other companies we work with	The companies provide us with information to help us deliver our products and services to you. These include: <ul style="list-style-type: none"><li>• Network operators and distributors: to connect your meter to the energy network.</li><li>• Meter installation booking companies</li><li>• Debt collection agencies</li><li>• Service and metering engineers</li><li>• Price comparison websites and other lead generation providers</li><li>• Account or Bill Management companies who you have asked to manage your bills on your behalf</li><li>• Companies who support the delivery of some of our products. This would include Homeserve who we have teamed up with to offer Home Care Cover</li><li>• Businesses providing, managing and monitoring our IT infrastructure</li><li>• Companies in the same group of companies as us: who may provide relevant information about the products and services bought from them.</li></ul>

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Credit, anti-fraud agencies and the Police or other law enforcement agencies	They provide us with information about your financial, transaction and credit history and any information required to investigate cases of criminal activity of fraud, this will depend on the nature of the case or investigation
Housing associations, landlords, letting agencies and developers, including local authorities and social housing providers	They provide us with tenants' information, to enable us to make contact about their energy supply
The Government, Ombudsman Services, Regulators and Citizens Advice:	These governmental or quasi-governmental organisations provide information to us for various purposes, including in relation to complaints they have received, to help us deliver services to you, verifying your eligibility for discount schemes and to enable you to exercise your rights under various other laws and regulations.
Public registers	These registers, such as the Land Registry, provide us with information about your property
Private registers	These registers, such as Google Maps, Google StreetView, Zoopla, provide us with information about your property
Third parties approved by you	You may authorise them to make requests on your behalf.
Trial partners	Companies we work with to test our new products and services such as BP International Ltd who we partner with on our Strala trial
Mailing and delivery companies	For print and mail fulfilment or to deliver products to you
Debt purchasers and potential purchasers	

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## 10. Third parties who process your data

Energy providers must work with industry partners as an essential element of the supply network in the UK to enable us to maintain continuity of supply. We also use third parties to help us host our infrastructure and applications, communicate with members, power our emails etc as we believe they are the best in their field at what they do.

We pass your information to a very limited number of third parties for the following reasons:

- To deliver the services you have requested from us, which might include giving information to members of your family, household, or other people who have an interest in the property, for instance, landlords or letting agents
- To deliver services that we have a legal obligation to provide to you, to ensure your continuity of supply and to ensure your services are delivered as you expect
- For legal or regulatory purposes including the detection of crime and fraud prevention
- If we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy.

Here are the details of some of our key third-party service providers, and what data they collect or we share with them, where they store the data and the purpose for which they need it

### Industry & energy service provision

We collect or share your data with various categories of third-party agencies, such as meter operators who are responsible for maintaining your meter, meter asset providers who own your meter, data collectors who collect meter readings from your meter, data aggregators who need the data to ensure supply and demand is balanced as well as occasional other third-party suppliers without whom the network could not operate.

This is an essential element of the energy supply network in the UK to enable us to maintain continuity of supply.

Service Provider	Data collected or shared	Purpose	Useful links
ECOES (Electricity Central Online Enquire Service)	<ul style="list-style-type: none"><li>• Contact details</li><li>• Data about your account</li><li>• Data that identifies you</li><li>• Data on how you use Tonik services</li><li>• Data about your energy equipment, usage, generation and property details</li></ul>	ECOES is a market information system supporting the electricity customer transfer process in Great Britain	<a href="#">Privacy Policy</a> <a href="#">Website</a>
GDCC (Green Deal Central Charge Database)	<ul style="list-style-type: none"><li>• Contact details</li><li>• Data about your account</li><li>• Data that identifies you</li><li>• Data on how you use Tonik services</li><li>• Data about your energy equipment, usage, generation and property details</li></ul>	The GDCC is a centralised market system that receives and processes industry-defined message flows from Retailers, DNOs, Energy Performance Certificate (EPC) registers, Green Deal Providers, Remittance Processors and the ECOES database	<a href="#">Privacy Policy</a> <a href="#">Website</a>
DCC (The Data Collection Company)	<ul style="list-style-type: none"><li>• Contact details</li><li>• Data about your account</li><li>• Data that identifies you</li><li>• Data about your energy equipment, usage, generation and property details</li><li>• Transaction information</li></ul>	Management of smart meter communication	<a href="#">Privacy Policy</a> <a href="#">Website</a>

	<ul style="list-style-type: none"> <li>Dispatch appointment times</li> </ul>		
Xoserve	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data on how you use Tonik services</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	Xoserve is the Central Data Service Provider for Britain's gas market. It enables the reliable, efficient operation of Britain's competitive retail gas market to serve all customers large and small.	<a href="#">Privacy Policy</a> <a href="#">Website</a>
National Grid	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data on how you use Tonik services</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	To comply with rules and regulations set by Ofgem. National Grid is a network operator and distributor and our partner for the delivery of the first phase of our smart metering rollout	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Other energy companies, network companies and industry bodies	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data on how you use Tonik services</li> </ul>	To comply with rules and regulations set by Ofgem, as part of industry initiatives, the Theft Risk Assessment Service, or to help make it easier for you to switch suppliers in line with industry guidelines.	
PWC	<ul style="list-style-type: none"> <li>Data about your account</li> <li>How you use Tonik</li> </ul>	To comply with financial audit regulations	<a href="#">Privacy Policy</a>
Your new energy provider	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	To enable you to switch to a new company that you have selected to provide you with gas or electricity.	
TMA	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data on how you use Tonik services</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	<p>TMA (UDMS) provide three services</p> <p><b>Data Collector (DC)</b> – Sends and receives meter readings data and flows between different industry parties.</p> <p><b>Data Aggregator (DA)</b> – Acts as a historian of a meters reading data. The DA is also instrumental in managing energy settlements and exceptions.</p> <p><b>Data Retriever (DR)</b> – The people who will physically knock on doors to obtain meter readings.</p>	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Lowrie Beck	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data that identifies you</li> <li>Data on how you use Tonik services</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	Whilst TMA have meter readers throughout the UK, they do not cover all areas so they also sub-contract their meter reading services to Lowrie Beck (LBSL).	<a href="#">Privacy Policy</a> <a href="#">Website</a>

## The Government or our regulators

Service Provider	Data collected or shared	Purpose	Useful links
Office of Gas and Electricity Markets (Ofgem)	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your account</li> </ul>	To comply with rules and regulations set by Ofgem.	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Financial Conduct Authority (FCA)	<ul style="list-style-type: none"> <li>Account information and details of other people linked to your account</li> </ul>		<a href="#">Privacy Policy</a> <a href="#">Website</a>
Information Commissioner's Office (ICO)	<ul style="list-style-type: none"> <li>Financial &amp; transaction information</li> <li>Anti-fraud information</li> <li>Vulnerability information</li> </ul>	If you raise a dispute or complaint and are eligible for review by an ombudsman service, like the Energy Ombudsman Service, or we are required to notify them under our legal obligations e.g. breach notification to the ICO	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Ombudsman services	<ul style="list-style-type: none"> <li>Purchase and account history</li> <li>Records of our communication between you and our team at Tonik Energy</li> </ul>		<a href="#">Privacy Policy</a> <a href="#">Website</a>
BEIS (Department for Business, Energy & Industrial Strategy)	<ul style="list-style-type: none"> <li>Records of our communication between you and our team at Tonik Energy</li> <li>Technical data</li> </ul>		<a href="#">Privacy Notice</a> <a href="#">Website</a>
The Treasury			<a href="#">Privacy Notice</a> <a href="#">Website</a>

## Financial services including payment partners, debt collection, credit checking & fraud

Service Provider	Data collected or shared	Purpose	Useful links
GoCardless	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Financial information</li> <li>Financial &amp; transaction information</li> </ul>	Secure payment collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Paypoint	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Financial &amp; transaction information</li> </ul>	Payment collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>
Experian	All the personal data which is necessary for us to deal with the dispute, which will depend on the nature of the investigation	Fraud detection and investigation	<a href="#">Privacy Policy</a> <a href="#">Consumer Website</a> <a href="#">Business Website</a>
Credit Style	All the personal data which is necessary for us to deal with the collection of the debt	Debt collection	<a href="#">Privacy Policy</a> <a href="#">Website</a>

## Organisational Management & Infrastructure

Key companies that help us run our business and support our IT & Technology infrastructure

Service Provider	Data collected or shared	Purpose	Useful links
Microsoft Azure	All personal information we collect as listed in Section 7	The platform on which we build, manage and deploy online applications	<a href="#">Privacy Policy</a>
Microsoft Office365	All personal information we collect as listed in Section 7	The provision of our office applications for document creation, management and email communication	<a href="#">Privacy Policy</a>
Companies in the same group as us:	<ul style="list-style-type: none"> <li>Our parent company Retig</li> </ul>		

<ul style="list-style-type: none"> <li>Phoenix Works</li> </ul>	<ul style="list-style-type: none"> <li>Contact details</li> <li>Data about your account</li> <li>Data about your energy equipment, usage, generation and property details</li> </ul>	<p>As our partner for the provision of our solar and battery technology products, data is only shared if you have a current relationship with Phoenix Works</p>	<p><a href="#">Privacy Policy</a></p>
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## Analytics

Service Provider	Data collected or shared	Purpose	Useful link
Google Analytics	<ul style="list-style-type: none"> <li>Contact details</li> <li>How you use Tonik</li> <li>Various other personal data as set out in their privacy policy</li> <li>Cookies</li> </ul>	<p>Google Analytics is a web analytics service: we use it to track your use of our online services, prepare reports on user activity and help us ensure our content is accessible on different platforms and devices. We are not able to identify you from our Google Analytics data</p>	<p><a href="#">Privacy policy</a></p>
Third parties commissioned to do specific analysis	All information required to undertake the analysis.	,.....	

## Integrations (including those by your request) & social media

Service Provider	Data collected or shared	Purpose	Useful links
Google	<ul style="list-style-type: none"> <li>Contact details</li> <li>How you use Tonik</li> <li>Various other personal data as set out in their privacy policy</li> <li>Cookies</li> </ul>	<p>This enables you to authenticate via Google and connect with Google services such as location mapping</p>	<p><a href="#">Privacy policy</a></p>
Facebook	<ul style="list-style-type: none"> <li>Contact details</li> <li>How you use Tonik</li> <li>Various other personal data as set out in their privacy policy</li> <li>Cookies</li> </ul>	<p>This enables you to authenticate via Facebook and interact with us via Facebook pages or messaging</p>	<p><a href="#">Privacy Policy</a></p>
Trust Pilot	<ul style="list-style-type: none"> <li>Contact details</li> </ul>	<p>This enables you to provide a review of our services</p>	<p><a href="#">Privacy Policy</a></p>
Twitter	<ul style="list-style-type: none"> <li>Contact details</li> </ul>	<p>This enables you to interact with us via the Twitter platform</p>	<p><a href="#">Privacy policy</a></p>
Gravatar	<ul style="list-style-type: none"> <li>Data that identifies you</li> </ul>	<p>Gravatar is a global avatar service provided by the operators of Wordpress. Your public Gravatar image may be visible on your MyTonikSpace webpage.</p>	<p><a href="#">Privacy Policy</a></p> <p>Further information: If you are unsure where this image has come from it is likely that you have associated this image with a Wordpress site, as a website or blog owner, or a Wordpress site user. For more information about Gravatar please visit <a href="https://en.gravatar.com/support/">https://en.gravatar.com/support/</a> Or to check which email addresses have a Gravatar attached to them visit <a href="https://en.gravatar.com/site/check/">https://en.gravatar.com/site/check/</a></p>

## Communications

Service Provider	Data collected or shared	Purpose	Useful links
Foehn	<ul style="list-style-type: none"><li>• Contact details</li><li>• Our communication with you</li><li>• How you use Tonik</li></ul>	For the provision of our phone and online chat facilities	<a href="#">Privacy Policy</a>
Mailchimp	<ul style="list-style-type: none"><li>• Email address</li><li>• How you use Tonik</li><li>• Data that identifies you</li><li>• Technical data</li><li>• Our communication with you</li></ul>	For sending, storing and tracking emails	<a href="#">Privacy Policy</a>
UKMail	<ul style="list-style-type: none"><li>• Contact details</li><li>• Our communication with you</li></ul>	For sending postal mail	<a href="#">Privacy Policy</a>
RSVP	<ul style="list-style-type: none"><li>• Contact details</li><li>• Our communication with you</li><li>• How you use Tonik</li><li>• Financial information.</li></ul>	For the provision of outgoing calls to our members and handling calls for taking payments over the phone.	<a href="#">Privacy Policy</a>

## Industry Partners

Service Provider	Data collected or shared	Purpose	Useful links
BP International Limited	<ul style="list-style-type: none"><li>• Contact details</li><li>• Financial information</li><li>• Account information</li><li>• Our communication with you</li><li>• Details of other people linked to your account</li><li>• Data about your energy equipment, usage and property details</li><li>• Technical data that identifies you</li><li>• Data on how you use Tonik services</li><li>• Sensitive data</li><li>• Other types of data</li><li>• Enquiries or complaints</li></ul>	Strala is a pilot peer-to-peer energy trading platform; data collected will track your use of the mobile application, your energy consumption and, where relevant, electricity production and battery storage. This is used to provide real-time and retrospective visualisation information and to conduct energy trades on the platform.	<a href="#">Privacy Policy</a>

## 11. How we use cookies

We use cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies are anonymous, so they don't store any personal information of any kind.

Unless you adjust your browser settings to refuse cookies, we (and our third parties) will issue cookies when you use our website to distinguish you from other users of our website. These may be 'session' cookies, meaning they delete themselves when you leave Tonik Energy websites, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide you with a tailored service. This helps us to provide you with a brilliant experience when you browse our site and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

## **We use the following cookies:**

Necessary cookies — we need these for our site to operate. These cookies, for example, enable you to obtain a quote or to log into secure areas of our site.

Performance cookies — these help us to improve the way our site works by analysing how people move about our site enabling us to help you to find things more easily.

Functionality cookies — let us greet you by name and provide you with a more personalised service.

Targeting cookies — record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please note that where third parties use cookies we have no control over how those third parties use those cookies, and you should check their cookie policies for further details.

## **How can I block cookies?**

If you don't want us to use cookies in your web browser, you can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can also delete cookies through your browser settings.

However, please remember that some parts of our website require cookies to function properly and if you use your browser settings to disable, reject, or block cookies (including essential cookies), you may not be able to access all or parts of our website. More information about cookies including what they are and how to block or delete them can be found at [www.aboutcookies.org](http://www.aboutcookies.org)

## 12. Your privacy choices and rights

### Your Choices

	<p><b>You can choose not to provide us with your personal data</b></p> <p>If you do choose to do this, you can continue to use the website and browse its pages or interact with us on social media but we will not be able to provide you with energy services or process transactions without personal data.</p>
	<p><b>You can turn off cookies in your browser by changing its settings</b></p> <p>You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and browse its pages, but Tonik space and some other online services will not work effectively.</p>
	<p><b>You can ask us not to use your data for marketing</b></p> <p>We will inform you (before collecting your data) if we intend to use your data for marketing and if any third parties are involved. You can opt out from marketing by managing your settings within your Tonik Space account or by contacting us:</p> <p>Telephone: 0333 3442686 Email: <a href="mailto:hello@tonikenergy.com">hello@tonikenergy.com</a> or <a href="mailto:privacy@tonikenergy.com">privacy@tonikenergy.com</a> Post: Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT</p>

### Your Rights

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

<p>These rights are as follows</p> 	<p><b>You have the right to access information we hold about you</b></p> <p>This includes the right for us to provide you with on supplementary information about:</p> <ul style="list-style-type: none"><li>• the categories of data we're processing</li><li>• the purposes of data processing</li><li>• the third parties or categories of third parties to whom the data may be disclosed</li><li>• how long the data will be stored (or the criteria used to determine that period)</li><li>• your other rights regarding our use of your data all of which is covered in this policy.</li></ul> <p>We will provide you with the information within one month of your request, unless one of the following exemptions applies:</p> <ul style="list-style-type: none"><li>• Doing so would adversely affect the rights and freedoms of others (e.g. another person's confidentiality or intellectual property rights) or the law allows us to extend this period of time. We'll tell you if we can't meet your request for such reasons.</li></ul> <p>Some or all of the personal data is exempt from such requests in a particular circumstance. If this exemption applies, we will tell you this when responding to your request. Should you wish to exercise this right, please contact us with a description of the information you would like to see.</p> 
	<p><b>You have the right to make us correct any inaccurate personal data about you</b></p> <p>You have the right to ensure that any information we hold about you is accurate and kept up to date.</p>
	<p><b>You can object to us using your data for profiling you or making automated decisions about you</b></p> <p>We may use your data to determine whether we should let you know information that might be relevant to you (for example, tailoring emails to you based on your energy consumption or location).</p> <p>Otherwise, the only circumstances in which we will do this is to provide Tonik Energy services to you.</p>

	<p>You have the right not to be subject to any decisions made based solely on automated processing, including profiling, which produces legal effects or significantly affects you. Where such decisions are made, you have the right to:</p> <ul style="list-style-type: none"> <li>• Obtain human intervention</li> <li>• Express your point of view</li> <li>• Obtain an explanation of the decision and challenge it</li> </ul>
	<p><b>You have the right to export your data to another service</b>  We will give you a copy of all the personal data applicable to this right in CSV or JSON format so that you can access it and / or provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.</p>
	<p><b>You have the right to be ‘forgotten’ by us</b>  You can ask us to delete your personal information in certain circumstances. You can do this by asking us to erase any personal data that we hold about you, if it is no longer necessary for us to hold that data for any of the purposes set out in this Privacy Policy that still apply to you relating to the provision of Tonik Energy products or services. The right to erase your personal data is can be made on the following grounds:</p> <ul style="list-style-type: none"> <li>• Your personal data is no longer necessary in relation to the purpose for which it was collected or processed</li> <li>• If the processing is based on consent, you choose to withdraw your consent and there is no other legal ground for processing</li> <li>• You object to processing, and there are no overriding legitimate grounds to continue the processing</li> <li>• Your personal data has been processed unlawfully</li> <li>• Your personal data must be erased for compliance with a legal obligation</li> </ul>
	<p><b>Restrict processing</b>  You have the right to request the restriction of processing of your personal data under specific conditions, unless we have a lawful reason to continue, such as for the establishment, exercise or defence of legal claims.</p>
	<p><b>Object to processing</b>  You have the right to object to processing which is based on:</p> <ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Tasks carried out in the public interest</li> <li>• Direct marketing</li> </ul>
	<p><b>You have the right to lodge a complaint regarding our use of your data</b>  We would ask that if you do wish to do this that you please tell us first so that we have a chance to address your concerns. If we fail in this, you can address any complaint to the UK Information Commissioner’s Office, either by calling their helpline or as directed on their website at <a href="http://www.ico.org.uk">www.ico.org.uk</a>.</p>

We’ll always endeavour to respond to all requests within one month as per the requirements of the data protection legislation. If your request is complex or if you make lots of requests, the law allows us to extend our time to respond – if this is the case, we’ll let you know.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may charge a reasonable fee taking into account the administrative costs of providing the information or refuse to provide the information.

Where we refuse a request, we will explain our reasons for the refusal, and remind you of your right to complain.

## How to exercise your rights

You can contact Tonik Energy’s data protection officer by writing to:

The Data Protection Officer  
Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT.

You can also contact our data protection officer via email at [privacy@tonikenergy.com](mailto:privacy@tonikenergy.com)

## 13. How long do we store your data?

We will only store your personal data for as long as is necessary to fulfil the purposes outlined in this Privacy Policy or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights. This means that your data will be retained in line with statutory and regulatory requirements.

As a paper free organisation we do not routinely store copies of documents we receive, These are handled appropriately and then securely destroyed through our confidential waste system.

The criteria used to determine these retention periods includes:

- To comply with the minimum regulatory retention requirements as set by OFGEM, OFCOM and the Department for Business, Energy & Industrial Strategy.
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- Where our retention periods are not governed by legislation, our retention policy is based on commercial justifications, which have been set in accordance with the principle of retaining personal data for no longer than is necessary for the purposes for which it is processed. These include:
  - To demonstrate compliance with our Supplier Licence Conditions
  - To enable us to provide you with our products and services
  - To allow us to resolve any disputes or complaints
  - For the detection and prevention of fraud

## 14. Information Security

Tonik Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with.

This includes robust security mechanisms, business continuity and resilience plans and ongoing testing of these measures.

We update and test our physical, logical and procedural security controls on an ongoing basis. These include limiting access to your personal data to those who need it and training our employees about the importance of maintaining the privacy and security of your personal data.

## 15. Making this Privacy Policy great

Well done for getting to the bottom of this Privacy Policy! We are conscious that there is a lot of information here and we will be working over the coming months to continue ensuring that this Privacy Policy is as clear and simple as possible.

We have designed it to be as transparent, useful and engaging as possible and we would love to hear your feedback on how we can make it even better.

This is a dynamic document that will change regularly so please don't make this the last time you read it as we will post any changes on this page – any significant changes will, of course, be notified to you by email.

Most recent update: March 2019

Previous update: May 2018