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## PRIVACY POLICY

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### BACKGROUND:

Puredrive Energy Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our websites, [www.puredrive-energy.co.uk](http://www.puredrive-energy.co.uk) and [www.duracellenergy.com](http://www.duracellenergy.com) (“Our Sites”) and uses our Applications including our mobile apps, and will only collect and use personal data (relating to a business or a customer) in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is required on first use and following any updates to this policy. If you do not agree with our Privacy Policy, you will not be able to access Our Sites and Applications.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Site or Applications
<b>“Application”</b>	means any of our computer or mobile software applications which allow you to access, monitor and update your Account, account details and products and services provided by us or our partner providers
<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 15, below
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003
<b>“Data Protection Legislation”</b>	means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”); the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended; and any applicable guidance or codes of practice issued by the Information Commissioner’s Office or other applicable regulatory authorities from time to time
<b>“Special category / Sensitive”</b>	means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life, sexual orientation, biometric, or genetic data
<b>“Our Sites”</b>	means <a href="http://www.puredrive-energy.co.uk">www.puredrive-energy.co.uk</a> and <a href="http://www.duracellenergy.com">www.duracellenergy.com</a>

## 2. **Information About Us**

Our Sites are owned and operated by Puredrive Energy Ltd. a private company limited by shares registered in England under company number 10286123.

Main trading address: Unit 18a and 18b Orchard Industrial Estate, Evesham Rd, Toddington, Cheltenham, GL54 5EB.

Data Protection Officer

Email address: legal@puredrive-energy.co.uk.

Telephone number: 01386 577845.

Postal address: DPO, Puredrive Energy Ltd, Unit 18a and 18b Orchard Industrial Estate, Toddington, Cheltenham, GL54 5EB.

## 3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Sites, our social media channels or our Applications, including any temporary promotions we may run from time to time. Our Sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4. **What Is Personal Data?**

Personal data is defined by Data Protection Legislation as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

In simpler terms, it is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are Your Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us directly to find out more or to ask any questions using the details in Part 16.
- b) The right to access the personal data we hold about you. Part 14 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 16 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 16 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.

- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 16.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 16.

## 6. **What Data We Collect**

Depending upon your use of Our Sites and Applications, we may collect, use, transfer and process some or all of the personal and non-personal data set out below. See Part 15 for more information about our use of Cookies and similar technologies. We do not collect 'special category' or 'sensitive' personal data, except in some very limited, exceptional circumstances which will be discussed in person with you if the need arises.

Personal data you put into forms, our applications, when entering a competition, promotion or survey on our Sites or Apps at any time. This includes personal data provided at the time of registering for our service, subscribing for services at any time, creating an account, posting material or requesting further services.

Requests that marketing material is sent to you

Personal data you provide via our social media platforms

Personal and non-personal data you provide to us when you contact us by message, post, telephone, video call or otherwise

Data you provide when you report a problem or provide other feedback including a record of any correspondence between us

Details of transactions you carry out on our Sites or Apps

Details of your visits to our Sites or Apps and the resources you use

Personal data you upload to our Sites or Apps and any other form of interaction data you provide

Information about your computer (e.g. your IP address, browser, operating system etc.) for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns which does not identify any individual.

System data and account or usage information and data and asset parameters from third parties about your system and usage, including App and Partner Portal login details, energy providers, National Grid and utility providers, product and service serial numbers, warranty information.

Depending on your circumstances and the products and services selected the personal data we gather about you includes: your name, address, business name and contact details, email address, phone number, financial information, personal identification information and any further personal data as required as part of the service or product provided or which you share through our Sites or Apps.

## 7. **How Do You Use My Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We will use your personal data only when it is required to perform our contracts, when it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests and when we need to comply with a legal or regulatory obligation. We seek your consent in order to provide marketing content and communications to you. We use personal and non-personal data about you to:

Register you and your system on our Applications and manage and administer your account effectively

Present content and provide our services effectively to you

Provide information on and allow you to use products and services that you request or (with your consent) those products or services which will be of interest to you or to personalise your experience

Allow us to improve our service to you by responding to your customer service requests and feedback or review

Take steps at your request prior to entering into a contract or to carry out our contractual or regulatory obligations and provide you with the products and services under the terms of our contractual arrangements with you or in compliance with our regulatory obligations

Allow you to access and use our interactive services

Administer a contest, promotion, survey or other Site or App feature

Tell you about changes to our products or services

Provide or facilitate the provision of services directly or indirectly including keeping appropriate records

Manage payments for our products and services

In some circumstances it will be appropriate for us to combine your personal and non-personal data with other information that we hold about you, such as combining your name with geographic location, browsing history or purchasing history.

With your permission and/or where permitted by law, we may use your personal data for marketing purposes, which may include contacting you by email or telephone / text message or post with information, news, and offers on our products and services.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time. You can update your contact preferences at any time by using the link contained in our email messages or by contacting us at any time via [support.uk@duracellenergy.co.uk](mailto:support.uk@duracellenergy.co.uk).

We may automate decisions for some of our processes. If at any point you wish to query any action that we take on this basis or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 16.

The following automated decisions may be applied:

- Grid Services: third-party grid services or energy suppliers may apply commands to energy storage or EV charger systems to balance power on behalf of the national grid on days or at times of peak use based on location or grid area ("Grid Events"). This can include the temporary modification of charge or discharge settings in response to Grid Events.
- Variable Rate Tariffs: we may use system users' energy tariff information, localised weather forecasts and system information to apply commands to home energy storage or EV charger systems to charge or discharge at times which optimise cheap rate energy use ("Smart Mode").

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 16.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## **8. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was collected.

9. **What is the retention process?**

We will retain such personal data as is required to perform any services we provide to you and for a period of time thereafter to enable us to comply with our regulatory, legislative and business requirements. We regularly review our data retention obligations, to ensure we do not keep personal data for longer than is required to carry out those obligations.

10. **How and Where Do You Store or Transfer My Personal Data?**

We will store your personal data primarily in the UK. This means that it will be fully protected under the Data Protection Legislation.

We may store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We may store some of your personal data in countries outside of the UK and EEA. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data.

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data.

For further information about binding corporate rules, adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- having procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;
- protecting data and systems using access controls, monitoring and oversight, encryption and other security protocols and implementing processes which require the collection, control and processing of personal data to be risk assessed in light of all the relevant circumstances.

11. **Do You Share My Personal Data?**

We will only share personal data with third parties in accordance with this Privacy Notice.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for the purpose of delivering our products and services to you.

We may share personal data with third-parties for the purpose of them supplying us or you with certain products or services. Where we do this we will do so on the basis of contractual obligations which are designed to keep your data secure and only used for the purposes of delivering the specific product or service.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above.

We may contract with providers in the following sectors to supply our products and services:

<b>Sector</b>	<b>Activity Carried Out</b>	<b>Location</b>
IT product and service providers (data processor).	Provision of IT products and services to enable our business processes and delivery of products and services to our customers through third party providers	UK, EU / EEA, other locations by contractual arrangement.
Project Managers and data analytics providers (data processor)	Provision of project management and data analytics services for product and service delivery, testing and performance analytics using anonymised or partially anonymised data.	UK, EU / EEA, other locations by contractual arrangement
Energy companies and grid services providers (data processor)	Provision and management of grid services	UK, EU / EEA, other locations by contractual arrangement
Logistics service providers (data processor)	Provision and management of courier, transportation, finance or other logistics services	UK, EU / EEA, other locations by contractual arrangement
Supply chain partners (data processor)	Provision of products and services to you through our supply chain	UK, EU / EEA, other locations by contractual arrangement

## 12. **How Can I Control My Personal Data?**

12.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Sites, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or, at the point of providing your details).

12.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 13. **Can I Withhold Information?**

You may access certain areas of Our Sites without providing any personal data at all. However, to use all features and functions available on Our Sites and to use our Applications you may be required to submit or allow for the collection of certain data.

## 14. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress. [Make a request](#) for your personal data held by us.

## 15. **How Do You Use Cookies?**

Our Sites and apps may place and access certain Cookies on your computer or device to distinguish users and improve the user experience of our Sites and Apps. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Sites and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and



respected at all times.

By using Our Sites, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Sites mainly for understanding how the website performs, how you interact with our websites, keeping our services secure, providing advertisements that are relevant to you, and all in all providing you with a better and improved user experience and to help speed up your future interactions with our websites.

Our Cookie Policy provides further details and is [available here](#).

#### 16. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Data Protection Officer):

Email address: [legal@puredrive-energy.co.uk](mailto:legal@puredrive-energy.co.uk).

Telephone number: 01386 577845.

Postal Address: FAO DPO, Puredrive Energy Ltd, Unit 18a & b, Orchard Industrial Estate, Toddington, Cheltenham, GL54 5EB.

#### 17. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following amendment. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on 14 January 2025.

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