

PRIVACY STATEMENT FOR BUSINESS PARTNER AND PUBLIC DATA

1. INTRODUCTION

This Privacy Statement is applicable to the processing by Calor Gas Limited, registered company no. 00303703, whose registered office is at Athena House, Athena Drive, Tachbrook Park, Warwick CV34 6RL (hereafter referred to as “Calor”, we or us) of all personal data belonging to members of the public, customers, suppliers and business partner data. This Privacy Statement is not applicable to business related data and/or data on companies.

Calor is the controller for the processing of personal data. In this statement we describe who we are, how and for which purposes we process your personal data and all other information that may be relevant to you. If you have any additional questions you can contact us via the contact details provided at the bottom of this statement. Please note that this policy may not fully apply if we process your personal information as a data processor of another data controller.

This statement may change over time and the most up-to-date version is published on our website at www.calor.co.uk/privacy. If significant changes are being made, we will take steps to actively inform you if you are a current customer:

Date	Version no	Change
17/5/2018	1	First version
30/11/2019	2	<ul style="list-style-type: none">• Minor clarification to Section 4 – 2 : Third party access;• Added email addresses for DPO contacts• Better reflect our processing in terms of:<ul style="list-style-type: none">○ CCTV use○ processing of due-diligence / credit monitoring○ arrangements around priority services register / special category information○ phone call recordings○ Rural Community Fund & other sponsorship initiatives○ Public COMAH notifications○ Third party referrals – marketing partnerships and agreements○ Distributor / intermediary (where Calor is acts as a data processor)○ Geo-location and recording on vehicles○ IR35 tax arrangement changes○ Social media○ Joint controllerships○ List of cookies explanations

2. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

Calor will process your personal data when you do business with us, when you use our websites or apps or when you interact with us.

A. For answering your questions

If you get in touch with us, we will use your personal data in order to reply to and answer your question(s). When you call Calor, we may record the conversation to enable us to administer and manage any contractual relationship we have with you, to undertake evaluation and training of our staff and to ensure compliance with our legal obligations.

For this purpose:

- we process your personal data for this purpose on the basis of your consent when you provide us with your personal data or on the basis of our legitimate interest to train and evaluate our staff so that they can better help our customers or ensure compliance with our legal obligations.
- we process your name, contact details, any account details, delivery notes, purchase orders, invoices and account statements and your correspondence with us, call recording records, your question(s) and all other personal data which are necessary to answer your question(s).

B. For the development and improvement of products and/or services

We process your personal data in order to assess, analyse and improve our products and (customer) services. We use aggregated personal data to analyse customer behaviour and to adjust our products and services accordingly. When you use a Website or the App, enter or search data through this Website or the App, we also process your personal data to compile analytics reports. We use aggregated personal data to analyse customer behaviour and to adjust our products and services accordingly, to ensure that it is relevant to our customers. This means that we analyse how often you read our newsletters, how often you visit our Website or Apps, which pages you click on and what goods you purchase through our Website or Apps. We may purchase supplementary data from public sources to complement our database for the above purposes.

For this purpose:

- we process your information based on our legitimate interest to develop and improve our products and services;
- we process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information, and correspondence with us. In addition, we process the personal data you entered into a Website or that were generated by the functionalities you used in a Website and the technical data from your device such as its IP-address, the pages you visited on our Websites, your click- and surf behaviour and the length of your session;
- If you choose to participate in our research, we may ask you to provide us with personal data, such as **name, address, contact details and sociodemographic information**. We may also use the personal data that you have provided in the research for this purpose.

C. For the assessment and acceptance of a customer, supplier, business partner or the recipient of sponsorship or charitable donations

When you get in contact with us, we will process your personal data for assessment and acceptance purposes, for example in order to confirm and verify your identity. Calor will further process your personal data for other administrative purposes such as due diligence and screening against publicly available government and/or law enforcement agency sanctions lists. We may record phone calls with you to administer and manage our contractual relationships and services with you.

For this purpose:

- We process personal data because this is necessary for the conclusion of a contract between you and us. Calor cannot enter into contracts without obtaining the required information;
- We process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information, publicly available information, information from sanctions and/or law enforcement agency databases, phone call records and details of your correspondence with us.
- Where you interact with us through the Calor Rural Community Fund, we process your information according to the privacy policy at <https://www.calor.co.uk/shop/communityfund/privacy-policy>

D. For relationship management and the conclusion and execution of agreement

When you have purchased a product or service from us as a customer, when you work together with us as a supplier or business partner, or is a recipient of charitable donations or sponsorship agreements from us, we process your personal data for administrative purposes such as sending invoices, making payments, and performing account management. We use your personal data in order to deliver or receive and administer our or your products or services and to further execute our agreement. When you require access to Calor's premises, we process your personal data for screening purposes.

We may deploy telemetry to measure the gas levels and usage of a tank that we supply to you to ensure that you do not run out of gas, ensure the safety of your tank, and ensure that your tank is well-maintained.

We may process some special category information so far as is necessary to fulfil legal obligations under duty of care, or to comply with legal obligations and best practice. Where we process this information, we will aim to seek informed consent from you unless there is an overriding legal obligation or it is not practicable to do so.

For this purpose:

- we process personal data because this is necessary for the conclusion of a contract between you and us and to ensure compliance with our legal obligations including but not limited to environmental and health and safety laws. Calor cannot enter into contracts without obtaining the required information;
- where we process sensitive personal information, we will aim to seek informed consent save in circumstances where it is impracticable to do so or we are subject to an overriding legal obligation;

- we process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information and details of your correspondence with us, gas usage details, gas safety details, location of the gas tank.

E. For marketing purposes

We use the information stored in our customer and prospect databases for the development, execution and analysis of market research and marketing strategies, including sending you suitable offers and newsletters as well as to provide customer services, perform account management and communicate recalls.

For this purpose:

- As an existing customer, supplier or business partner and for a reasonable time after the completion of our agreement, we may send you marketing communications based on our legitimate interest. Outside of this, we send personalised marketing material to you based on your consent. Where we refer you to third parties about their products and/or services, we will ask for your consent before we send your personal information to them.
- For the above, we process your contact details such as your address and email address, personal details such as your name, contact preferences, and correspondence with us.
- We may also use personal data based on our legitimate interest to analyse and improve our marketing strategies.
- We aim to analyse and improve our marketing strategies using non-identifiable aggregated information; however, we may process your personal details, payment information, order history, and past history of sales.

F. For business process execution and internal management

We process your personal data in the performance and organisation of our business. This includes general management, order management and management of our assets. Calor also processes your personal data for its internal management. We provide central processing facilities in order to work more efficiently. We conduct audits and investigations, implement business controls, and manage and use customer, supplier and business partner directories. Also, we process your personal data for finance and accounting, archiving and insurance purposes, legal and business consulting and in the context of dispute resolution.

For this purpose:

- we process personal data based on our legitimate interest to maintain and improve sound business operations;
- we process your contact details such as your address and email address, personal details such as your name, payment and credit information, payment and order history, correspondence with Calor and data generated during the performance of the agreement between you and Calor.

G. For organisational analysis and development, management reporting and acquisition and divestures

At Calor, we process your personal data in the preparation and performance of management reporting and analysis. We use personal data to create management reports and to analyse our business. We conduct customer, supplier and business partner surveys to learn more about your views and opinions in preparation of our management reporting. We also process your personal data for management reporting purposes in the context of mergers, acquisitions and divestitures and in order to manage such transactions.

For this purpose:

- we process personal data based on our legitimate interest to maintain and improve sound business operations;
- we process your contact details such as address and email address, personal details such as your name and date of birth, payment and order history, correspondence with us and the information you provide when responding to our research.

H. When you use our websites or apps

If you use our Website, we process technical data to offer you our Website's functionalities and to allow our Website's administrators to manage and improve our Website's performance as well as secure our Website and underlying IT systems and network. If you enter data in our Websites, such as a product preference or your location to receive relevant information or functionalities, Calor processes this data to provide you with the requested information or functionalities. Further, we process your personal data to allow you to save your data (such as preferences and products) to your saved items and to allow you to share these with others using the sharing options you have configured on your device. We also register if we have obtained consent from you in compliance with relevant legislation.

Depending on the website you use and your preferences, we may store cookies on your device. Details of cookies stored can be found at:

www.calor.co.uk	https://www.calor.co.uk/cookies
https://networkplus.calor.co.uk/Login.aspx	https://networkplus.calor.co.uk/cookies.aspx
www.caloraccountonline.co.uk	https://www.caloraccountonline.co.uk/cookies.aspx

For this purpose:

- we process personal data based on our legitimate interest to offer technically adequately working Websites and to improve our Websites' performance;
- we process the personal data you have entered into our Websites or that is generated by the functionalities you have used in our Websites and the technical data from your device such as its IP address, the internet browser you use, the pages you have visited on our Websites, your click and surf behaviour and the length of your session.

I. Interaction via social media

On Social Media pages

Calor is active on social media platforms like Facebook, Twitter, LinkedIn and YouTube. When you contact Calor via social media, we process your personal data in order to answer your questions and to respond to your messages. Your personal information will be controlled by the social media platform and application utilised, not Calor. We may retain copies of our correspondence with you through Social Media where it is also covered by another processing purpose outlined by this statement.

Any social media posts or comments you make to us will be shared under the terms of the relevant social media platform (e.g. Facebook, Twitter or LinkedIn) on which they are made, and could be made public by that platform. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

We may also communicate with you on social media or via communications apps such as Facebook Messenger if you are connected to us, if you use social media or a communication app or if you post a photo or video linked to Calor or our products.

In addition, when you visit a 'Contact us' screen on one of our Websites or Apps, you can contact us through a variety of communication channels. We provide you with our email address, for you to send us your feedback and suggested improvements, as well as our Website, trade website, Twitter, Facebook and YouTube details. When you click one of the corresponding icons we will refer you to the website or app of the applicable third party, whether this is your email provider or a social media platform.

For this purpose:

- we process personal data based on our legitimate interest to adequately respond to your questions and correctly refer you to our social media pages:
- we process the communication channel you have chosen to use to connect with us and the personal data you supply to Calor. This includes your (user) name, address, email address and the personal data you have included in your message. In addition, when you click one of the buttons displayed, the relevant third party might place cookies on your device.

Web based marketing and advertisements

We may also use social media to display advertisements. This is either based on the information the relevant social media platform has collected from you or the information Calor has collected from you.

- Where the social media platform has collected the information, Calor does not get access to that information. As a result, we have no say in how the platform stores and uses the information. We recommend reading the conditions and privacy statements of your social media provider. They also often provide you with account settings or some other means to change your privacy settings.
- We may have access to aggregated information about you through these platforms, but the information we process is not personally identifiable. We do not

proactively collect or provide your social media information from one platform to another, or other third parties, save for information strictly necessary to respond to your query if you reach out to us on those platforms.

You can opt out at any time from sharing your information with social media platforms for advertising by contacting the relevant social media platform.

J. To monitor and investigate compliance

We monitor our processes to check compliance with our policies and regulations. During monitoring activities, your personal data may be accessed and viewed.

For this purpose:

- we may process your personal data based on our legitimate interest to monitor our internal processes and in order to comply with the law;
- any personal data that is stored in our systems may be accessed and viewed for compliance purposes. The personal data that are accessed and viewed will not be stored for compliance purposes, unless we need them to further investigate potential non-compliant behaviour;
- we do not retain your personal data for this purpose, unless they are linked to non-compliant behaviour. We will then retain the relevant personal data until the investigation or proceedings have been concluded unless there is a lawful basis to retain it further.

K. To protect health, safety, security and to ensure integrity

At Calor, we value your health, safety, security and integrity highly. We process your personal data in order to safeguard our employees, customers, suppliers, business partners and members of the public. As such, we authenticate your access rights to our premises. We may screen your personal data against publicly available government and/or law enforcement agency sanctions lists, hold your personal data to make relevant health and safety notifications to you or process your personal data to protect Calor and employee and customer assets.

For this purpose:

- we may process your personal data based on our legitimate interest to monitor our internal processes and in order to comply with the law;
- we process your contact details such as your address, phone number and email address, personal details such as your name and date of birth, payment and order history, your visiting history to our premises, CCTV imagery, publicly available government and/or law enforcement agency sanctions lists.

L. To safely deliver our products and services

Calor uses vehicle technology to know where relevant vehicles are located at any given moment for environmental and health and safety purposes, promote safe driving and protect the well-being of employees and environment, for public security and protection of property (tracking stolen vehicles), for efficient driving and a

reduction of CO2 emission as a result from more efficient driving and to provide effective customer service notifications.

For the above purpose relevant vehicles mean vehicles of higher risk e.g. vehicles where ADR regulations apply, vehicles carrying high value items or equipment, or other vehicles, circumstances that have significant potential risks to public safety, security or asset security or vehicles utilised to delivery products and /or services to our customers.

For this purpose:

- we may process your personal data based on our legitimate interest to monitor our internal processes and the protection of society and our habitat as well as our property and in order to comply with the law (transport, environmental and health and safety laws and regulations)
- we process road facing vehicle camera imagery and CCTV imagery, your name, address and contact details.

M. To comply with the law

In some cases, we process your personal data to comply with laws and regulations. This could be the case, for example, where tax or business conduct related obligations apply. In order to comply with relevant laws and regulations, we may need to disclose your personal data to government institutions or supervisory authorities.

For this purpose

- we process your personal data in order to comply with the law;
- we process your contact details such as your address and email address, personal details such as your name and date of birth, payment information, payment and order history, and your Companies House registration and VAT details and tax details.

N. When you participate in events or promotions

If you choose to participate in promotions or events (such as the Calor Community Fund), we need your personal data to be able to announce and organise these. In addition, if you participate in any of these activities, we need your personal data to measure the response to events and/or promotions.

For this purpose:

- we process personal data based on your consent. You can withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before withdrawal;
- we process your name, address, email address and your entries and/or participation in the relevant event.

3. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Calor will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for

instance where we are required to do so in accordance with legal, regulatory, tax, accounting, or necessary technical requirements.

In specific circumstances, we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Promptly after the applicable storage period has ended, the Data shall either be:

- (i) securely deleted or destroyed;
- (ii) anonymised;
- (iii) transferred to an archive (unless this is prohibited by law or an applicable records retention schedule).

For details about the retention periods of the records and information we store, please contact us using the contact details at the bottom of this Privacy Statement.

4. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Access to your personal data within Calor

As a global organisation, data we collect may be transferred internationally throughout companies within Calor's worldwide organisation. Your personal data may be exchanged with the group of companies that Calor belongs to, shareholders and associated companies. We exchange your data for administrative purposes and so that we can have a complete overview of your contacts and contracts with the group that Calor belongs to. We may also exchange your data in order to offer you a complete package of services and products.

Calor's employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.

In some cases, your personal data may be transferred to a country that does not provide an adequate level of protection of personal data. However, Calor has taken measures to ensure that your personal data is adequately protected as binding corporate rules are applicable throughout the group that Calor belongs to.

Access to your personal data by third parties

The following third parties may have access to your personal data where relevant for the provisioning of their products or services to Calor: banks, insurance companies and brokers, IT suppliers and consultants, financial, tax or legal advisors, accountants, inspection authorities, forensic specialists, consultants and lawyers, contractors, temporary workers, joint controllers of personal data and other sub-contractors who help us deliver or process products and services to or from you.

When third parties are given access to your personal data, Calor will take the required contractual, technical and organisational measures to ensure that your personal data is only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

If personal data is transferred to a third party in a country that does not provide an adequate level of protection of personal data, we will take measures to ensure that your personal data is adequately protected, such as entering into EU Standard Contractual Clauses with these recipients.

In other cases, your personal data will not be supplied to third parties, except when required by law.

5. HOW IS YOUR PERSONAL DATA SECURED

We have taken adequate safeguards to ensure the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to unnecessary collection) or further processing.

6. HOW CAN YOU EXERCISE YOUR PRIVACY RIGHTS?

You have the right to request access or an overview of your personal data, and under certain conditions, rectification and/or erasure of personal data. In addition, you may also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability.

To invoke your privacy rights, please contact us by using the contact details at the bottom of this Privacy Statement. Keep in mind that we may ask for additional information to verify your identity.

Data subject rights exercised through Calor will not automatically be exercised by any third party joint controller working with Calor. Should you wish for such third party joint controller to also exercise data subject rights you will need to contact them directly.

7. CAN YOU WITHDRAW YOUR CONSENT?

Once given, you may always withdraw your consent. Please keep in mind that withdrawal does not have retrospective effect and the withdrawal of your consent is only possible in case you first have given your consent. Please contact us to withdraw your consent by using the contact details at the bottom of this Privacy Statement.

8. HOW TO LODGE A COMPLAINT?

If you have a complaint about the use of your personal data by Calor, you can lodge a complaint via the contact details at the bottom of this statement. Besides lodging a complaint with Calor, you are also able to lodge a complaint with the Group Data Protection Officer and the relevant UK authority, the Information Commissioner's Office (ICO).

9. HOW CAN YOU CONTACT US?

If you have any questions about the way we process your personal data, please read this statement first. For additional questions, remarks, compliments or complaints, please contact in the first instance Calor's Privacy Officer at Calor Gas Ltd, Athena house, Athena Drive, Tachbrook Park, Warwick CV34 6RL, PrivacyOfficer@calor.co.uk or call 0345 8508796.

The Group Data Protection Officer (DPO) can be contacted at dpo@shvenergy.com.