



Privacy Policy

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Shell Energy UK Limited is committed to ensuring the privacy and security of your personal data.

This Privacy Policy explains what personal data are processed about you, why we are processing your personal data and for which purposes, how long we hold your personal data for, how to access and update your personal data, as well as the options you have regarding your personal data and where to go for further information.

In this Privacy Policy, when we refer to "personal data", we mean information which could directly identify you (for example, your name) and information which could indirectly identify you, meaning that it could identify you when combined with other information which we hold about you (for example, your date of birth). If you are a sole trader or partnership it is likely that much of the data we hold about your business will be classified as personal data but if you are a limited company it is likely the only personal data we will hold is employees' business contact details. "Process" or "processing" means just about any conceivable use of personal data, including recording, storing, viewing or disclosing personal data.

Shell Energy UK Limited (company number 7489042) is the data controller of your personal data (referred to in this Policy as "Shell Energy UK Limited" or "we").

If you have any questions about your personal data which are not answered by this Policy, please contact The Shell Group Chief Privacy Officer:

By post: The Shell Group Chief Privacy Officer at Shell International B.V. The Hague, The Netherlands - Trade Register, No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague. By email: Privacy-Office-SI@shell.com

How we collect your personal data

Information provided by you

We collect your personal data to give you the best possible experience as a user of our products and services. In general, we collect information from you when you interact with us to request a quote or availability check, open up an account, visit our website, make a purchase from our online shop, enter a competition, complete a survey or contact us with an enquiry or complaint. This covers all channels of communication with us, including over the telephone, email, live chat, website, via one of our apps, social media, SMS, post and in person.

We'll collect the following information from you when you request a quote or availability check:

- Your name
- Contact address
- Email address
- Telephone number
- Meter readings and consumption data

When you open an account, we'll also collect:

- Name and contact details of individuals authorised to access your account
- Previous address history
- Your date of birth
- Bank account or payment details
- Meter readings and consumption data
- Information such as your annual turnover and number of employees, to determine your microbusiness status
- Any business specific job title.

To be sure that we're providing the best support to your business, we may ask you for and/or process the following information, so we can tailor additional help and support appropriately:

- Information about any health or medical conditions that occupiers may have
- Details of your company turnover
- Any other information that you provide us with as part of your application.

This personal data may be shared with Network Operators, for example energy distributors and transporters (who may then share that information with water companies in line with agreed industry processes), to enable them to prioritise your property's supply should any issues occur for example a loss of power or water supply.

Should your circumstances change, we may also ask for the following to allow us to service your account:

- Your new address or a copy of your tenancy agreement, should you move.
- Banking details, should you decide you would like to set up a Direct Debit with us.
- Documentation to support a change of company name, status or change of premises request, such as a Companies House certificate or proof of address.
- Documentation to help us close or transfer an account in the case of a bereavement, such as death certificates, solicitors' correspondence, wills or probate documents.

We will also obtain or request the following information if you contact us with an enquiry or complaint:

- Any information that you disclose to us as part of your enquiry or complaint.
- Necessary information to resolve your complaint, which could include:
 - Bills from your previous supplier
 - Legal documentation
 - Tenancy agreements
 - Copies of cheques or bank statements

If you enter one of our surveys or competitions, we will collect the following:

- Your contact details

- Any information that you disclose to us in your responses.

If you visit our website <https://uk.shellenergy.com/>:

- Your device and browser may disclose certain information (such as device type, operating system, browser type, IP address, MAC number, dates and times our website was accessed and other information) that may be Personal Data

Cookies and similar technologies

Shell uses cookies and similar technologies that collect and store information when you visit a Shell Website, a customer portal or use a Shell App. This is to enable Shell to identify your internet browser and collect data on your use of our website, which pages you visit, the duration of your visits and identify these when you return so that we improve your experience when visiting our website(s). You can control and manage your cookies preferences by adjusting your browser settings or using the Shell cookies preference tool on Shell Websites – for more information, please refer to the Shell Energy Cookie Policy at <https://uk.shellenergy.com/policies/cookies>.

Information collected from other sources

Price comparison websites, brokers and third-party sellers:

- Your personal data will be passed onto us from price comparison websites, brokers and third-party sellers should you choose to interact with them to generate a quote or open up an account with us.

Credit reference agencies:

- When you open up an account with us, your credit score will be provided to us by third party credit reference agencies.

Smart meters:

- Unless we notify you otherwise, if you have a smart meter installed at your property, we'll automatically receive readings in relation to your energy consumption. This will allow us to provide you with a number of benefits including accurate bills, and the ability to keep track of the energy you use.
- If you have a smart meter installed in your property, we'll automatically collect information regarding your energy consumption.
- For more information on your smart meter, please get in touch at SEUKL-contactus@shell.com.

Industry organisations:

- If you're an energy customer, we'll receive information from industry organisations involved in the supply of your gas and electricity for example meter readers, meter equipment owners/ fitters and other energy suppliers. We will also receive data from energy distributors and transporters who operate

national databases for the gas and electricity markets which will include information such as unique identifiers linked to your meter and the address of the registered property.

- Energy distributors and transporters may also make us aware that the nature of your business or use of your premises means that you may have vulnerable tenants and share information you have provided to them (or to water companies in line with industry processes) such as information relating to health issues.

Debt collection agencies:

- If you have an outstanding debt with us, additional personal data may be provided to us by debt collection agencies. This could include updated contact details such as your new address.

Tenants, landlords and letting agencies:

- If you move into a property that is on supply with us, your details may be provided to us by the previous tenant, your landlord or your letting agency. This could include your name, property address, email address and contact telephone number. If you move out of a property that is on supply with us, and you have an outstanding debit or credit balance, we may receive your forwarding address or contact telephone number from your landlord or the new tenant.

Publicly available sources:

- We may use publicly available sources such as the electoral register, Land Registry, phone directories or Companies House to verify the information we hold about you or, for example, to trace you if you have moved without paying your bill.

Other companies with an appropriate lawful basis for sharing your personal data:

- Where you have given your consent to another company for us to market our products and services to you
- Provide information relating to your personal finances to enable us to offer you tailored debt paths.
- To enable us to check any information which may be missing from your account i.e. date of birth to enable us to identify you if you contact us.

Screening:

- In addition, in order to comply with legal and regulatory obligations, to protect Shell's assets and employees/contractors and specifically to ensure that Shell can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening (pre-contract and on a periodic basis post-contract) on owners, shareholders and directors of our Business Customers, Suppliers and Business Partners. This screening takes place against publicly available or government issued sanctions lists and media sources.

The screening does not involve profiling or automated decision-making in relation to the counter-parties or potential counter-parties.

How we use your personal data

We'll use your personal data for the purposes outlined below:

To fulfil our contractual agreement to provide you with our products and services:

- Where requested by you, to provide you with a quotation for any of our products and services.
- To deliver our products and services to you according to our contractual agreement.
- To manage the forecasting and calculation of consumption data and validate invoices.
- To collect customer payments and manage payment plans.
- To contact you with important information about your account, including bills and statements.

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

- To comply with our regulatory requirements, for example those under OFGEM.
- To meet our data protection obligations to verify your identity, before we provide you with information relating to your account.
- To resolve any disputes relating to your service usage with us, or your previous supplier.
- For the detection and prevention of crime, including any investigations into potential fraudulent activity, such as energy theft.
- To ensure that your contact details are correct, so that we are able to comply with our requirements to update the Emergency Services database.
- To respond to requests for information from the police and government bodies, to support in criminal investigations.
- To offer a priority service for vulnerable customers, such as those with specific health or medical conditions.
- To comply with legal and regulatory obligations including health and safety, trade control, anti-money laundering and/or bribery and corruption laws.
- To defend against litigation or legal claims.

Where we have legitimate business interests:

- To respond to customer enquiries and complaints.
- To manage payment schedules, credit levels and debt collection.
- To understand customer behaviour using modelling, analysis and profiling, so that we can provide you with products and services that are best suited to your requirements, including execution and analysis of market surveys.
- For management information reporting purposes including the use of analytics to help us continually improve our offering and operations to our customers.
- To assess the financial vulnerability of our customers, so that we can ensure you are on the best plan for your individual circumstances.
- Subject to your marketing preferences, to provide you with information about products and services that we think you'd benefit from, by post, telephone or by electronic means.

- To provide you with energy insights, based on your consumption data.

Where we have your consent:

- To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences.
- To obtain half-hourly meter readings from your smart meter.

Vital interests:

If we are concerned about you or someone else's well-being or safety and/or there is a threat to life, we may share your data with the emergency services.

Substantial Public Interests:

- In the event that your energy supplier ceases trading and Ofgem appoints us to take over your supply or we buy another business, and you are registered as a Priority Service customer, we will also receive details about the category of priority service you require which may include details relating to the health of the occupants of the property and any special services received.

Communication and marketing - your choices:

If you are an existing customer, subject to your marketing preferences, or where you have otherwise expressly consented, we'll send you relevant information about products and services that we think you'd benefit from. This could include updates about more cost-effective plans that we have identified for you based on your usage.

We'll never sell your data to third parties for marketing purposes. However, subject to your marketing preferences, we may send you recommendations about third party products and services that could be of interest to you.

This information could be sent to you via telephone, email, SMS, post, push notification or via your online account.

You can opt out or update your marketing preferences at any time by contacting us:

Telephone: 0330 088 2679 Email: SEUKL-contactus@shell.com Post: Customer Services, Shell Energy UK Limited, 3rd Floor, Elder House, 586-592 Elder Gate, Milton Keynes MK9 1LR.

Profiling for marketing:

We'd like you to receive personalised insights and offers about products and services that are most relevant to

you, at the right time. In order to do this effectively, subject to your marketing preferences we will analyse your personal data to create a profile of you for marketing.

Your profile will be used to send you personalised communications we feel you'd benefit from, based on a variety of factors such as:

- General postcode and demographic data from publicly available sources
- Information you have provided us directly
- Your current and historic meter usage
- The impact of variables such as the time of day/weather on your energy usage
- Your previous supplier
- The stage of your contract you are currently at
- The channels you use to interact with us
- Your eligibility for government schemes, where applicable
- Any other products and services you have purchased from us
- Customer insight information from external data sources such as credit reference agencies and Experian.
- The products and services you've bought from us previously

You can opt out of profiling at any time by opting out of all marketing. This can be done by contacting us at:

Telephone: 0330 088 2679 Email: SEUKL-contactus@shell.com Post: Customer Services, Shell Energy UK Ltd, 3rd Floor, Elder House, 586-592 Elder Gate, Milton Keynes MK9 1LR.

Credit Reference Agencies (CRAs):

We'll perform automated processing in the form of a credit check before we open up an account for you. We use credit reference agencies to confirm the following:

- That you operate from the property you'd like Shell Energy UK Limited to supply.
- The previous addresses your business may have occupied.
- Your credit score. This is calculated by credit reference agencies based on information including (but not limited to) your financial accounts, credit applications and insolvency related events.

For more information regarding how your personal data is processed by our credit reference agencies and how your credit score is calculated, please visit Experian at experian.co.uk/legal/crain.

We will use this information to calculate a Shell Energy UK Limited credit score. This will be used to assess whether you are likely to be able to afford payments for our products and services.

If you are applying as an energy customer and you fail to pass our credit checks, we will ask you for a security deposit before we set you up as a customer. For more information about your rights in relation to decisions which are made based on automated processing, please see the "Your rights in relation to your personal data" section of this Privacy Policy.

Who will we share your personal data with?

Shell Group

Your personal data may also be shared with any company that is a member of our group of companies, which includes our ultimate parent company Shell Plc, where necessary for internal administrative purposes, corporate strategy, auditing and monitoring, sanctions screening and research and development. For more information on how your personal data will be used for sanctions screening, please see the 'Information collected from other sources' section of this Privacy Policy.

Your personal data may also be shared with our group companies for profiling purposes, such as to determine whether you have purchased any other products and services from us.

We may also share your personal data with our group companies where they provide products and services to us that help us to provide products and services to you as our customer, including:

Shell view of the customer

With the aim of ensuring you have a seamless experience with the Shell group, and depending upon the nature of your engagement with Shell, Shell combines information gathered from the sources referred to above to create a personal profile of you. This enables you to interact with different Shell companies more easily and ensures we have the most up to date information about you in order to better develop services and products and to tailor offers relevant to your specific interests.

Please note however, you have the ability to control how Shell uses this information. You can opt out of having your personal data combined in this way - Please see the section above - 'Profiling for Marketing' for more information.

Shell Energy Europe

If you are a large limited company we may provide your information, by way of a referral, to Shell Energy Europe to supply you with energy.

Other Third Parties

Your personal data may also be shared with the following categories of third parties:

- Energy and business services infrastructure providers, so that we can provide you with access to our products and services.
- Installation service providers, to enable us to send out engineers to your property.
- Price comparison websites and brokers, should you use these third parties to generate a quote or register as a customer with us.
- Fraud protection and prevention services, such as the TRAS fraud prevention agency, to help us to identify any potential fraudulent activity and for the prevention and detection of money laundering.

- Debt collection agencies, including debt collection agency staff who may visit your property, and other organisations assisting us with debt recovery (for example, courts and our solicitors).
- Credit reference agencies, to enable us to perform a credit check prior to entering into contract with you.
- Payment providers, to enable you to make online payments for our products and services.
- Printing and distribution services, so that we can send out mailings to you.
- Industry regulators (e.g. Ofgem, Ofcom and Department for Business, Energy and Industrial Strategy (BEIS), legal and tax services, to help us comply with our legal and regulatory obligations and to improve our services/operations.
- Distribution Network Operators and Gas Transporters to provide your contact details for use in the event of a loss of supply or any information to support an investigation.
- Dispute and complaints services, should we need to resolve a complaint with you.
- IT service providers, to enable us to manage and host our IT platforms.
- Third party telesales companies and sales agents, who may contact you on our behalf with offers of our products and services.
- Social media platforms and contact management tools, to enable us to respond to any communications with you via our social media and digital channels and provide you with advertising about our products and services which we think may benefit you.
- Marketing and advertising agencies, to help us develop our marketing communications so that they are relevant for you.
- Survey hosting providers, to enable us to send out surveys to you so that we can learn from your feedback and improve our customer service.
- Voucher and gift fulfilment companies, should you be entitled to receive an incentive from us.
- Referral marketing platforms, should you choose to participate in a referral scheme.
- Independent organisations and charities, such as Citizens Advice, should you choose to engage with us or raise a complaint through these channels.
- Landlords, letting agencies and property managers, to communicate outstanding balances on your account.
- Management consultants to help us improve the service we offer to you.
- Law enforcement agencies and other public authorities such as the police.
- Suppliers who assist Shell Energy UK in fulfilling its contractual and legal obligations (such as Gas operations providers who maintain an out of hours energy load management / demand management service on behalf of Shell Energy UK).

We will also disclose your personal data to third parties:

- (a) Where it is in our legitimate interests to do so to run, grow and develop our business:
 - i. if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - ii. if Shell Energy UK Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Shell Energy UK Limited will be one of the transferred assets.

- (b) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (c) To enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity.
- (d) To protect the rights, property or safety of Shell Energy UK Limited, our employees, customers, suppliers or other persons.

Any third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

Save as expressly detailed above, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your personal data in a particular way, but later change your mind, you should contact us and we will stop doing so. You can do so by:

Telephone: 0330 088 2679 Email: SEUKL-contactus@shell.com Post: Customer Services, Shell Energy UK Ltd, 3rd Floor, Elder House, 586-592 Elder Gate, Milton Keynes MK9 1LR.

Transfers of your personal data to other countries

Where your personal data have been transferred to companies within the Shell group and/or to authorised third parties located outside of your country (including outside of the European Economic Area) we take organisational, contractual and legal measures to ensure that your personal data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented to safeguard your personal data. These measures include Binding Corporate Rules for transfers among the Shell group and for Shell companies in the European Union, European Commission approved transfer mechanisms for transfers to third parties in countries which have not been deemed to provide an adequate level of data protection as well as any additional local legal requirements. You can find a copy of Shell Binding Corporate Rules at shell.co.uk/privacy.html or by contacting privacy-office-si@shell.com For more information, please contact us by:

Telephone: 0330 088 2679 Email: SEUKL-contactus@shell.com Post: Customer Services, Shell Energy UK Ltd, 3rd Floor, Elder House, 586-592 Elder Gate, Milton Keynes MK9 1LR.

Security

Shell Energy UK Limited have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with against unauthorised, accidental or unlawful access, loss, alteration and disclosure. 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.

Interacting with Shell Energy through social media

If you choose to interact with us through social media on a Shell Energy administered social media page such as Facebook, Instagram, Twitter or LinkedIn, your personal data (such as your name, your profile picture and the fact that you are interested in Shell Energy) will be visible to all visitors of your personal webpage depending

on your privacy settings on the relevant social media platform, and will also be visible to us.

You can delete any information that you share on these sites at any time through your relevant social media platform's account. We do not track your activity across the different social media sites that you use. Please contact us if you wish to make a request that you are unable to action yourself and which relates to a Shell Energy Social Media Page. For further information please see the section 'Your rights in relation to your personal data'.

Additionally, and to the extent Shell Energy is jointly responsible with a social media platform of a Shell Energy Social Media Page, we will have access through the social media platform to aggregated data providing statistics and insights that help to understand the types of actions you take on Shell Energy Social Media Pages. For more information on how your personal data is processed on those social media platforms, including any targeted advertising that you may receive, please refer to your privacy settings accessible through your relevant social media platform's account.

Interacting with Shell Energy through social media

If you choose to interact with us through social media on a Shell Energy administered social media page such as Facebook, Instagram, Twitter or LinkedIn, your personal data (such as your name, your profile picture and the fact that you are interested in Shell Energy) will be visible to all visitors of your personal webpage depending on your privacy settings on the relevant social media platform, and will also be visible to us.

You can delete any information that you share on these sites at any time through your relevant social media platform's account. We do not track your activity across the different social media sites that you use. Please contact us if you wish to make a request that you are unable to action yourself and which relates to a Shell Energy Social Media Page. For further information please see the section '**Your rights in relation to your personal data**'.

Additionally and to the extent Shell Energy is jointly responsible with a social media platform of a Shell Energy Social Media Page, we will have access through the social media platform to aggregated data providing statistics and insights that help to understand the types of actions you take on Shell Energy Social Media Pages. For more information on how your personal data is processed on those social media platforms, including any targeted advertising that you may receive, please refer to your privacy settings accessible through your relevant social media platform's account.

How long do we hold your personal data for?

We'll 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. Your data will be retained in line with statutory and regulatory requirements. The criteria used to determine these retention periods includes:

- To comply with the minimum regulatory retention requirements as set by Ofgem, and the Department for Business, Energy and Industrial Strategy.
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- To comply with the retention periods set by the TRAS Fraud Prevention Agency.

- 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 comply 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.
- With some exceptions which are explained in supplementary privacy statements, any personal data that are required for the purposes of conclusion and execution of agreements with Business Customers, Suppliers and Business Partners or for considering bids or tenders, will be held during the duration of the contractual relationship and up to 15 years after. For agreements which have a term of more than five years and for the purposes set out above, these agreements will be held for 35 years with effect from the commencement of the agreement.
- In all other cases for the purposes set out above, including personal data gathered as part of any unsuccessful bids to Shell or which relates to the screening against publicly available or government issued sanctions lists and media sources, such personal data are held for no longer than 15 years after it was first gathered.
- In all cases information may be held for (a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or (b) a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate business purpose to retain it.
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Your rights in relation to your personal data

The following section sets out your rights in relation to your personal data.

If you would like to exercise any of your data subject rights, please email us at Privacy-Office-SI@shell.com.

We aim to keep our information as accurate as possible. You can request:

- access to your personal data;
- correction or deletion of the personal data (but only where it is no longer required for a legitimate business purpose such as continuing to supply your business with energy);
- that you no longer receive marketing communications;
- that the processing of your personal data is restricted; and/or that you receive personal data that you have provided to Shell Energy in a structured, digital form to be transmitted to another party, if this is technically feasible.

Who can you contact if you have a query, concern or complaint about your personal data?

If you have any issues, queries or complaints regarding the processing of your personal data please contact the Shell Group Chief Privacy Officer at Shell International B.V. The Hague, The Netherlands - Trade Register, No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague. By email: Privacy-Office-SI@shell.com.

If you are unsatisfied with the handling of your personal data by Shell Energy UK Limited, then you have the right to lodge a complaint to your local data protection authority The Information Commissioner's Office (ICO) whose address is Wycliffe House, Water Ln, Wilmslow SK9 5AF, Great Britain or the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ The Hague, The Netherlands. Please visit autoriteitpersoonsgegevens.nl/en for more information.

Changes to the Privacy Policy

This Privacy Policy does not form part of any customer's contract with us and we may amend it from time to time. Any changes we make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by email.

This Privacy Notice was last updated in October 2023.