

## Privacy Policy (“Policy”)

This Policy applies whenever the Project Better Energy group of companies uses your personal data. The Project Better Energy group of companies is:

- Project Better Energy Limited trading as Project Better Energy
- Project Solar UK Limited trading as Project Solar UK and PSUK
- Curv360 Limited trading as Project Curv, Project EV and Curv360

Any reference to “Project Better Energy”, “we,” or “us” in this privacy policy shall mean the Project Better Energy group. This privacy policy also applies to [www.projectbetterenergy.com](http://www.projectbetterenergy.com), [www.projectsolaruk.com](http://www.projectsolaruk.com), and [www.projectcurv.co.uk](http://www.projectcurv.co.uk) (the “Sites”), which are owned and operated by Project Better Energy Limited, Project Solar UK Limited, and Curv360 Limited, respectively.

This Policy explains what personal data we collect and how it is used, as well as what rights you have over your personal data and how you can use those rights. This Policy is regularly reviewed to ensure that we continue to serve your privacy interests.

We reserve the right to update this Policy from time to time, with any updates published on the Sites. Please review our Policy regularly to stay up to date with the most current information on our privacy practices. Although we may make minor adjustments, we will not substantially change the way we use personal information already provided by you without your prior consent.

Each company in the Project Better Energy group will be what’s known as the “controller” of the personal information you provide to us. This means we’re responsible for protecting the personal information we hold about you.

Our registered office is Unit 1, Lakes Court, Newborough Road, Needwood, Burton on Trent, Staffordshire, DE13 9PD.

### Summary of how we use your data and your rights

We may collect and process your data for certain purposes as permitted by the UK General Data Protection Regulation (GDPR). More information is provided in the “How we use personal data and the legal basis” section of this Policy.

The Sites are not intended for children, and we do not knowingly collect data relating to children.

You have a number of rights in relation to your personal data, such as the right to object to some of the processing which we carry out, the right to obtain a copy of your personal data, and the right to ask for your personal data to be corrected. More

information about your rights and how to exercise these is set out in the “Your rights” section of this Policy.

For any queries or to exercise any of your rights in relation to data protection, please email [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com) or write to the Data Controller at the address provided in the “Contact details” section of this Policy.

You can unsubscribe from marketing communications at any time. To opt out of marketing, select “unsubscribe” in emails, or email [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com).

Our Sites and apps use cookies and similar technologies to improve functionality, recognise you, and to customise your experience. You can reject and block cookies in your browser settings. Please see the cookie policy on our Sites for more information.

### **Data we collect from you**

We may collect data when you correspond with us (e.g., by post, phone, email, or completing an online form), purchase something, or use our services. This includes using our Sites or apps.

In particular, we may collect different kinds of personal data, which we have grouped together as follows:

- **Identity data**, such as name, username or similar identifier, marital status, title, date of birth, and gender, plus CCTV images if you are physically present at one of our sites.
- **Contact data**, such as email address, postal address and telephone number.
- **Financial data**, such as bank account details, payment card details and utility bills.
- **Transaction data**, such as details of products and services you have purchased from us or another provider and details about payments and correspondence to and from you.
- **Technical data**, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access the Sites or our apps.
- **Profile data**, such as username and password, purchases or orders made by you, your marketing and communications preferences, your interests, feedback and survey responses as well as any reviews you provide.
- **Usage data**, such as information about how you interact with and use our Sites, apps, products and services.
- **Health data**, to enable us to treat you with an appropriate level of care.

## **How is your data collected?**

We use different methods to collect data, including:

- Your interactions with us, including completing online forms; ordering goods or services; subscribing for services or publications; entering a competition, promotion, or survey; or corresponding by post, phone, email, or otherwise.
- Automated technologies, which collect technical data about your equipment, browsing actions, and patterns. For more details on our use of such technologies, please see the cookie policy on our Sites.
- Publicly available sources, such as Companies House and the Electoral Register.
- Third parties, including finance providers, data analytics providers, search information providers, and credit reference agencies. We may purchase marketing leads from third parties, in which case we require the third party to collect and transfer the data in accordance with the UK General Data Protection Regulation (GDPR) at all times.

## **How we use personal data and the legal basis**

We are allowed to use your personal data only if we have a proper reason to do so such as:

- To perform a contract, we have with you.
- When it is in our legitimate interests. A legitimate interest is when we have a business or commercial reason to use your data, such as preventing fraud or trying to improve your customer experience. We make sure that we consider and balance any potential impact on you and your rights before we process your data for our legitimate interests.
- When it meets the substantial public interest (Article 9(g)) condition of the GDPR and Schedule 1 Part 2 of the Data Protection Act 2018.
- When you consent to it.
- To comply with a legal obligation. When the law requires us to process your data we will do so. This can include legal, compliance, regulatory and investigative purposes, including for government agencies and law enforcement.

We have set out in the table below a summary of how and why we may use your personal data and the legal basis we rely on. This is also where we tell you what our legitimate interests are. Please see the “Contact details” section of this Policy if you would like to contact us to obtain additional information.

<b>Purpose/Use</b>	<b>Type of data</b>	<b>Legal basis</b>
To contact you to respond to enquiries, book appointments, provide a quote, and register you as a new customer.	Identity Contact	Consent if you have made an enquiry or requested an appointment, or a quote.  Performance of the contract with you.
To enable you to apply for, and take out, finance through the finance providers for whom we act as credit brokers	Identity Contact Financial Transaction Health	Consent if you have applied for finance.
To process and deliver your order, including managing payments and collecting money owed to us.	Identity Contact Financial Transaction Profile	Performance of the contract with you.  Necessary for our legitimate interests (to recover debts owed to us).
To use third parties to verify identity and check the validity of payment card details.	Identity Contact Financial	Performance of the contract with you.  Necessary for our legitimate interests (to reduce the risk of fraud or mistaken identity).
To enable you to take part in a competition, promotion, or survey.	Identity Contact Profile Usage	Performance of the contract with you.  Necessary for our legitimate interests (to study how customers use our products/services and develop our products or business).
To administer and protect our business and these Sites (including troubleshooting, data analysis, testing, maintenance, support, reporting and hosting of data).	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of IT services, network security, to prevent fraud)  Complying with a legal obligation.
To deliver relevant Site content, advertisements and promotions to you and	Identity Contact Profile	Necessary for our legitimate interests (to study how customers use our products/services and develop our products or business).

measure the effectiveness of our advertising.	Usage Technical	
To use data analytics to improve our Sites, products/services, customer relationships and experiences, and to measure and improve the effectiveness of our communications and marketing.	Technical Usage	Necessary for our legitimate interests (to keep our Sites updated and relevant, to define types of customers for our products, and to develop our products or business).
To monitor social media platforms and our Sites and online services, such as mobile apps and responses to email marketing.	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to study how customers view our products/services, address possible concerns, and develop our products or business).
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services.	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to carry out direct marketing and develop our products or business).  OR  Consent, if you have provided your prior consent to receiving direct marketing communications.
To record call centre communications, including calls and emails, for staff training, quality improvement and to keep accurate records.	Identity Contact Technical Profile	Necessary for our legitimate interests (to train our staff, improve the quality of our service, and retain accurate records in the event of complaints or disputes).
To analyse your transactions with us and other information you provide to us to understand you better as a customer and your preferences.	Identity Contact Financial Transaction Profile Usage	Necessary for our legitimate interests (to study how customers use our products/services, provide you with relevant offers and information and develop our products or business).
To contact you when you provide a review or provide us with market research feedback or provide this feedback to a third party for	Identity Contact Profile	Necessary for our legitimate interests (to study how customers view our products/services, address

panel market research analysis.	Usage	possible concerns, and develop our products or business).
To enable us, if you have any health issues, to deliver the right outcome to you in line with Consumer Duty.	Health	Necessary to safeguard your economic well-being
To enable third parties to provide grid trading and optimisation services to you.	Identity Contact Financial Transaction Profile Usage	Necessary for our legitimate interests (to study how customers use our products/services and develop our products or business).

### **We may, if you give us consent**

- Send you electronic marketing, including promotions and offers, in relation to products and services offered by us or other companies in the Project Better Energy group.
- Use cookies or similar technologies on the Sites, apps, and in marketing emails, including analytic cookies. For more details on our use of such technologies, please see the cookie policy on our Sites.
- Send you push notifications through our mobile app.
- Use data for other purposes where we explain that purpose when we ask for your consent.

When you give consent, you can withdraw that consent at any time by contacting us in accordance with the “Contact details” section of this Policy. If you do withdraw your consent, we can only continue to process your personal data if another legal basis applies, such as when we’re required to do something by law.

Nevertheless, you have an absolute right to opt out of direct marketing, including profiling for direct marketing purposes, at any time. You can opt out of marketing by selecting “unsubscribe” in emails or by contacting us in accordance with the “Contact details” section of this Policy.

### **Data sharing**

We may share personal data about you:

- with companies within the Project Better Energy group so that members of the group can contact you in the same way about the range of products and services

within the Project Better Energy group and selected third parties' portfolios. These services include other renewable solutions

- with lenders if you are applying for finance through a lender for whom we act as a credit broker and with third-party service providers that assist us in carrying out the data processing set out in the table above, or our insurers.
- with regulatory bodies, government authorities, consumer protection bodies, ombudsmen schemes, or other authorities to comply with our regulatory obligations and industry standards
- with any individual or entity where we are required to do so by law (e.g., because of a court order)
- with the police and any other investigatory authority where we consider it reasonable to do so to protect our business, premises, visitors, and staff
- with media organisations you've spoken to or corresponded with about our products and/or services
- with credit reference agencies or fraud prevention agencies
- with a third party and each party's respective advisers if all or part of our business or assets may potentially be sold or transferred to that third party
- with selected third parties with whom we are working to offer additional products and services, for example, to enhance the customer offering.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their purposes and only permit them to process your personal data for specified permitted purposes and in accordance with our instructions.

### **International transfers**

Sometimes we may need to transfer your data outside of the UK. We always ensure that data is only transferred:

- to a country that is deemed by the UK to provide an adequate level of protection for personal data; or
- in accordance with specific standard contractual terms approved for use in the UK, which give the transferred personal data the same protection as it has in the UK.

### **Cookies and similar technologies**

Our Sites, apps, and marketing emails use cookies and similar technology. Full information is in the cookie policy on our Sites. This includes information on how to adjust your browser settings to accept or reject cookies.

## **Data Security**

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Data retention**

We will only keep your data for as long as reasonably necessary to enable us to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirement.

To determine the appropriate retention period for the personal information we hold, we consider the amount, nature and sensitivity of the personal information, the risk of harm from unauthorised use or disclosure of your personal information, the reasons why we handle your personal information, the applicable legal requirements, and whether we can achieve those purposes through other means.

For example, we will keep your personal data, including your contact information and purchase details, for the duration of your product's warranty to ensure we can provide warranty services. Once the warranty period ends, we will securely delete or anonymise your data.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

If you unsubscribe from marketing communications, we keep a record of this request indefinitely to ensure we do not send you direct marketing again.

## **Your rights**

You have rights over your personal data.

You can:

- ask for a copy of your personal data.



- ask for your personal data to be corrected.
- ask for your personal data to be erased or deleted where there is no good reason for us to continue to process it.
- ask us to limit or restrict processing of your personal data.
- object to us processing your personal data, where we use the data for direct marketing, including profiling for direct marketing purposes. The right to object does not apply if we must process the data to meet a contractual or legal requirement.
- ask us to send you a copy in a structured digital format or ask for us to send it to another party.

Some rights, however, may be limited. We may be obliged by law or regulation to keep data. We must respect other people's privacy as well, which means we may need to redact or remove data where it includes personal data about someone else, even if it is connected to your data. On occasion, there may be a compelling legitimate interest to keep processing data.

If you want a copy of your data, to object to how we use your data, or ask us to delete it or restrict how we use it, please see 'Contact details' below. To process a request from you, we may need to confirm your identity to ensure we're accessing the right data.

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Contact details**

For any queries or to exercise any of your rights in relation to data protection, please email [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com) or write to the Data Controller at:

Unit 1  
Lakes Court  
Newborough Road  
Needwood  
Burton on Trent  
Staffordshire  
DE13 9PD

We keep this Policy under regular review and may update it from time to time. It is important that the personal data we hold about you is accurate and current. Please inform us if your personal data changes during your relationship with us, for example a new postal or email address.

These Sites may include links to third-party Sites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party Sites and are not responsible for their privacy statements.