

Website Privacy Policy

1. Introduction

1.1 Important information and who we are

Welcome to Lumo Energy Limited's Privacy and Data Protection Policy ("Privacy Policy").

At Lumo Energy Limited ("we", "us", or "our") we are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation ("GDPR"), the Data Protection Act 2018, and all other mandatory laws and regulations of the United Kingdom.

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data can include:

- Customers
- Any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all our employees and staff members and all Personal Data processed at any time by us.

1.2 Your Data Controller

Lumo Energy Limited is your Data Controller and responsible for your Personal Data.

We are not obliged by the GDPR to appoint a data protection officer and have not voluntarily appointed one at this time. Therefore, any inquiries about your data should either be sent to us by email at

hello@lumoenergy.co.uk or by post to:

39 Aberdeen Avenue, Cambridge, CB2 8DL, United Kingdom

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

1.3 Processing data on behalf of a Controller and processors' responsibility to you

In discharging our responsibilities as a Data Controller we have employees who will deal with your data on our behalf (known as "Processors").

The responsibilities below may be assigned to an individual or may be taken to apply to the organisation as a whole. The Data Controller and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see 2.2 below for more information);
- Ensure that Processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the Controller before engaging another Processor;
- Assist the Controller in the fulfilment of the Controller's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Controller all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and contribute to audits, including inspections, conducted by the Controller or another auditor mandated by the Controller;
- Maintain a record of all categories of processing activities carried out on behalf of a Controller;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the Controller; and
- Notify the Controller without undue delay after becoming aware of a Personal Data Breach.

2. Legal basis for data collection

2.1 Types of data / Privacy policy scope

"Personal Data" means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you, but this is the full scope of data that we collect and when we collect it from you:

- **Profile/Identity Data:** First name, last name, gender, date of birth.
- **Contact Data:** Phone number, addresses, email addresses.
- **Marketing and Communications Data:** Preferences in receiving marketing information and other information from us.
- **Technical Data:** IP address, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to engage with us.
- **Customer Support Data:** Feedback and survey responses.
- **Usage Data:** Information about how you use our website, products and services.

We do not collect any Special Categories of Personal Data (e.g. race, ethnicity, religious beliefs, health data, sexual orientation, political opinions, trade union membership, genetic or biometric data) nor information about criminal convictions and offences.

2.2 The legal basis for collecting that data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- **Consent:** When you opt-in (e.g. tick a box to receive newsletters).
- **Contractual Obligations:** Information required to fulfil a service or contract.
- **Legal Compliance:** Required by law (e.g. fraud prevention, illegal activity).
- **Legitimate Interest:** Information necessary to run our business in ways that do not materially impact your rights and freedoms (e.g. address for delivery, name for contact).

3. How we use your personal data

3.1 Our data uses

We will only use your Personal Data when the law allows us to.

3.2 Marketing and content updates

You will receive marketing and new content communications from us if you have created an account and opted into receiving those communications. From time to time we may make suggestions and recommendations to you about goods or services that may be of interest.

3.3 Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis.

We may process your Personal Data without your knowledge or consent if required or permitted by law.