

# BRYT ENERGY PRIVACY POLICY

UPDATED 31st MARCH 2025

At Bryt Energy, we respect your privacy and are committed to protecting your personal data.

As part of the Statkraft Group, personal data protection is an integral part of our culture, and the Group promises to only use personal data for appropriate purposes, acting with responsibility and integrity.

This privacy notice will inform you about how Bryt Energy uses and looks after your personal data when you interact with Us. It will also inform you of your privacy rights and how the law protects you as a data subject under UK GDPR. We have structured this privacy notice in a layered format to make it easy for you to navigate through the information. You can also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

If you have any queries or concerns about this privacy notice, please get in touch with us using the contact information in Contact Details.

## Important Information and Who We Are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Bryt Energy collects and processes your personal data, including any data you may provide through this website, or other channels, when you interact with Us in relation to products, services, employment or partnerships. It also describes how in the course of providing our services, we collect and use your personal data in order to deliver personalised advertisements for products and services you might be interested in.

Whilst this privacy notice's intended purpose is to inform you about the personal data we are responsible for, we'd also like to inform you about other categories of data we may collect so that we can provide our services to You. This includes commercial information, including but not limited to, consumption data and other metering information that we need to process for contractual purposes. While this information is not governed by the UK GDPR, it is still treated with care and consideration as we continue to apply stringent rules across all areas of Our business when handling data we are responsible for.

### Controller

Bryt Energy Limited is the Controller and responsible for your personal data (collectively referred to as "Bryt Energy", "we", "us" or "our" in this privacy notice).

#### **Bryt Energy Limited**

Registered office: 2 Cornwall Street, Birmingham, B3 2DX.  
Company registration number: 10167351. VAT number: 259 3947 54.

## Contact details

Bryt Energy has appointed a Data Protection Officer to support and advise our business on all matters of data protection. You can contact them directly by using the contact information below:

Email address: [dpm@brytenergy.co.uk](mailto:dpm@brytenergy.co.uk)

Postal address: DPO, Bryt Energy Ltd, Cornerblock, 2 Cornwall Street, Birmingham, B3 2DX

## Your right to complain

If you feel that Bryt Energy has used your data in a way that does not comply with UK GDPR, or you're not satisfied with our response to a data protection concern or query you have, you have the right to make a complaint to the Information Commissioner's Office (ICO), which is the UK supervisory authority ([www.ico.org.uk](http://www.ico.org.uk) or phone [0303 123 1113](tel:03031231113) or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF). We encourage you to contact Us in the first instance so we have a chance to resolve any issues or concerns you might have.

## Changes to the privacy notice and your duty to inform us of changes

We annually review this privacy policy and update it if required. Previous versions are archived and can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and kept up to date. Please keep us informed if your personal data changes during any relationship with us.

## Third-party links

This website may include links to third-party websites, 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 websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## The Data We Collect About You

Personal data is any information that could directly or indirectly identify a person. We may collect, use, store and/or transfer different kinds of personal and non-personal data, which we have grouped as follows:

- **Personal Data** includes full name, date of birth, job role, home address, email address, telephone number, username, numeric identifiers such as your IP address, national insurance number, passport and/or driving licence IDs; and, records of any conversations and correspondence (including recordings of telephone conversations) between you and Us.
- **Financial Data** includes bank account details.
- **Commercial Data** includes a business address, telephone number, email address, and metering information such as MPAN, consumption data, etc.
- **Transactional Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes your login and session data, browser type and version, time zone setting and location on the devices you use to access this website.
- **Profile Data** includes your username and (when an account has been created), feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes information such as your activities, interactions, your preferences in receiving marketing from us and third parties, and your communication preferences.
- **Online Identifiers** includes IP addresses collected by a third-party, and anonymised cookie IDs and unique identifiers such as GUID.
- **Special Category Personal Data** includes details about your race, ethnicity, religious or philosophical beliefs. Information about your health, and/or biometric data in some cases.
- **Aggregated Data** such as activities and interactions, statistical or demographic data that has been combined by Us.

## How Is Your Personal Data Collected

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Personal , Financial and Commercial Data by filling in forms or by corresponding with us via our website, post, phone, email, social media, in person, or otherwise.

This includes personal data you provide to Us when you:

- apply for our products or services;
  - become an employee of Our company;
  - create an account on Our website;
  - subscribe to Our service or publications;
  - partner with Us or become a third-party processor;
  - request marketing to be sent to you; or
  - provide Us feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Online Identifiers, which can help us understand your browsing actions and patterns. Please see our [cookie policy](#) for more information.
  - **Third parties or publicly available sources.** We may receive data from various third parties and public sources. This includes:
    - Personal, Financial and Transaction Data from providers of credit reference agencies such as Creditsafe Business Solutions Ltd based in the United Kingdom;
    - Personal and Commercial Data from electricity meter operators (including meter data collectors or aggregators) such as Siemens plc, Lowri Beck Services Ltd, SSE Metering Ltd, IMServ Europe Ltd and Stark Software International Ltd, all of whom are based in the United Kingdom;

- Personal and Commercial Data from Third Party Intermediaries (TPIs) and brokers that you have appointed as your agent (where relevant) in respect of your electricity supply arrangements, all of whom are based in the United Kingdom or elsewhere inside the EU;
- Personal and Commercial Data from publicly available sources, such as Companies House and the Land Registry based in the United Kingdom.
- Personal and Commercial Data shared with us with your consent by a third party, such as an event organiser.

## How We Use Your Personal Data

We promise to only use your personal data in legitimate and transparent ways. This may include:

- Where we need to perform the contract we are about to enter into or have entered into;
- Where you have given us explicit consent to process your information;
- Where it is necessary for our legitimate interests (or those of a third party) but after we've clearly demonstrated those interests do not override your rights and freedoms under UK GDPR; and
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a potential customer (and/or) new customer and manage Our relationship with you:</p> <p>This includes:</p> <p>(a) carrying out any credit checks that we deem necessary to determine your ability to pay any charges that may be due to Us; and</p> <p>(b) carrying out marketing activities to support potential and future relationships We may have with you.</p>	<p>(a) Personal</p> <p>(b) Profile</p> <p>(c) Usage</p> <p>(d) Financial</p> <p>(e) Transactional</p> <p>(f) Marketing and Communications</p> <p>(g) Commercial</p> <p>(h) Aggregated</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for Our legitimate interests (to keep Our records updated, to manage current or future relationships with you, to study how customers use Our products/services, to develop new products and grow Our business)</p>

<p>To register you for a new business partnership and to manage Our relationship with you. This includes:</p> <p>(a) carrying out any checks that We deem necessary to determine your ability to deliver services as per any agreements; and</p> <p>(b) carrying out marketing activities to support potential and future business partnerships.</p>	<p>(a) Personal</p> <p>(b) Profile</p> <p>(c) Usage</p> <p>(d) Financial</p> <p>(e) Transactional</p> <p>(f) Marketing and Communications</p> <p>(g) Aggregated</p> <p>(h) Commercial</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for Our legitimate interests (to keep Our records updated, to manage current or future relationships with you, to study how customers use Our products/services, to develop new products and grow our business)</p>
<p>To supply you with electricity and measure the electricity usage at each and every property being supplied</p>	<p>(a) Personal</p> <p>(b) Commercial</p> <p>(c) Aggregated</p>	<p>Performance of a contract with you</p>
<p>To help prevent and detect theft of energy, loss of energy and fraud</p>	<p>(a) Personal</p> <p>(b) Commercial</p>	<p>Necessary to comply with a legal obligation</p>
<p>To process and deliver your order including:</p> <p>(a) Calculating bills, managing payments, fees and charges</p> <p>(b) Collecting and recovering money owed to Us</p>	<p>(a) Personal</p> <p>(b) Financial</p> <p>(c) Transaction</p> <p>(d) Marketing and Communications</p> <p>(e) Commercial</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for Our legitimate interests (such as to recover debts due to us).</p>
<p>To manage Our relationship with you and grow Our business, which will include:</p> <p>(a) Identifying you when you phone Us to confirm who We are talking to</p> <p>(b) Notifying you about changes to Our terms or privacy policy</p> <p>(c) Asking you to leave a review or take a survey</p>	<p>(a) Personal</p> <p>(b) Profile</p> <p>(c) Marketing and Communications</p> <p>(d) Commercial</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for Our legitimate interests (to keep Our records updated, to manage current or future relationships with you, to study how customers use Our products/services, to develop new products and grow our business)</p>

<p>To enable you to take part in customer or market insight gathering or complete a survey</p>	<p>(a) Personal (b) Profile (c) Usage (d) Marketing and Communications (e) Commercial</p>	<p>(a) Performance of a contract with you (b) Necessary for Our legitimate interests (to study how customers use Our products/services, to develop them and grow Our business)</p>
<p>To administer and protect Our business, its systems and Our website and portals (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Personal (b) Technical</p>	<p>(a) Necessary for Our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising We serve to you</p>	<p>(a) Personal (b) Profile (c) Usage (d) Marketing and Communications (e) Technical (f) Aggregated</p>	<p>Necessary for our legitimate interests (to study how customers use Our products/services, to develop them, to grow Our business and to inform Our marketing strategy)</p>
<p>To use data analytics to train staff and improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage (c) Aggregated (d) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about relevant goods or services that may be of interest to you based on Our assessment</p>	<p>(a) Personal (b) Technical (c) Usage (d) Profile</p>	<p>Necessary for Our legitimate interests (to develop our products/services and grow our business)</p>

	(e) Aggregated (f) Marketing and Communications	
To manage our relationship with Our employees and staff members working on behalf of Bryt Energy	(a) Personal (b) Financial (c) Technical (d) Profile (e) Marketing and Communications (f) Aggregated	(a) Performance of a contract with you (b) Necessary for Our legitimate interests (such as communications, organising training events and staff activities) (c) Necessary to comply with a legal obligation (such as providing data to HMRC)

## Marketing

### Marketing communications

We may use your Personal, Commercial, Technical, Usage, Aggregated and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, offers and content may be relevant for you.

You may receive marketing communications from Bryt Energy either because We rely on a legitimate interest ('Soft Opt-In'), which is targeting individuals who have previously provided their data to Us under a different lawful basis and We think they might be interested in similar products, services, offers or content we make, or because you have given Us your explicit consent to use your data in this way.

We will collect your personal information for marketing purposes in a variety of ways, including:

- Where you have provided your personal data to Us directly through Our websites, such as a webform; in-person, such as at an event, or via email, telephone or through social media;
- Where data has been shared with us with your consent by a third party, such as an event organiser or third-party intermediate acting on your behalf; or
- Where data has been legally obtained through a third party – i.e. purchased data lists.

### Opting out

You can ask us to stop sending you marketing messages at any time by contacting Us using the contact information above or by unsubscribing from Our emails.

## Cookies

For information on the cookies we use on our website, please see our [cookie policy](#).

## 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 and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Where it is permitted by law, we may process your personal data without your knowledge or consent, in compliance with the above rules.

## Disclosures Of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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 own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International Transfers

Some of our External Third Parties are based outside the United Kingdom (UK) so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK supervisory authority, which give personal data the same protection it has in the UK. For further details, see the Information Commissioners Office: [International Transfers](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## Data Security

We have put in place appropriate security measures 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 only authorised personnel, which may include employees, agents, contractors and other third parties. 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

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law, we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your Legal Rights below.

## Your Legal Rights

At any time, you have the right to ask us to:

- provide you with a copy of the personal data you have provided to Us.
- update or correct your personal data.
- delete any personal data that We no longer have legal grounds to process.
- provide further information on how We use your personal data.
- stop the processing of your personal data where We use legitimate interest as the lawful basis.
- provide you with your personal data in a structured, machine-readable format or transmit the data to another controller upon your request.
- restrict how We use your information.
- provide information about the logic involved in the automatic processing of your personal data in the case of the automated decision-making.

If you wish to exercise any of the rights set out above, please contact us using the details available at the top of this policy. You can read more about your rights [here](#).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally, it may take us longer than 30 days to respond if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable Us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before We process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how We assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Consent** means you have full control over the processing of your personal data and can withdraw your consent at any time.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that We are subject to.

**The Group** means Statkraft Pure Energy Limited and its subsidiaries.

## THIRD PARTIES

### Internal Third Parties

Other companies in the Statkraft Group, details of which can be found [here](#), who are based in the United Kingdom and provide IT and system administration services and undertake group reporting.

### External Third Parties

- Service providers acting as data processors who provide IT and back-end system administration services such as Ensek Ltd (based in the United Kingdom), ESG, Phidex and salesforce.com EMEA Ltd (all data is processed inside the European Economic Area (EEA)).
- Credit reference agencies such as Creditsafe Business Solutions Ltd, based in the United Kingdom.
- Service providers acting as debt collection agents and solicitors such as EOS Solutions UK Plc, Echo Managed Services Ltd, 1st Locate (UK) Ltd, Wilkin Chapman LLP and Judge & Priestley LLP, all of whom are based in the United Kingdom.
- Electricity meter operators (including meter data collectors or aggregators) such as Siemens plc, Lowri Beck Services Ltd, SSE Metering Ltd, IMServ Europe Ltd and Stark Software International Ltd, all of whom are based in the United Kingdom.
- Energy market administrators such as ECOES and the Meter Point Administration Service, as we may need to check that your meter is correctly registered against your address.
- Professional advisers including Deloitte LLP (our statutory auditor) based in the United Kingdom who provide audit and tax compliance services.
- Regulatory, governmental and industry bodies such as Ofgem, HM Revenue & Customs, and Elexon based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Communications systems, agencies, website services, analytics services, event organisers and media providers acting as data processors who provide marketing services, including the distribution of marketing material and contacting individuals on our behalf, such as SendGrid and Pardot, whose servers are both based in the US.
- The Third Party Intermediary (TPI) or broker you appointed as your agent (where relevant) in respect of your electricity supply arrangements, performing services such as obtaining quotations, entering into contracts and validating invoices. Where the TPI performs these services, it has your authority to act on your behalf, and where the TPI purports to enter into a contract on your behalf or to exercise any of your rights under a contract, the authority to do so is expressed in writing.
- Other electricity suppliers if and when you switch electricity supplier.