



**Shell**  
**ENERGY**

# Privacy Policy

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Shell Energy is committed to ensuring the privacy and security of your personal data. The following Privacy Policy sets out the personal data that we collect about you as a user of our products and services, including how and why we process it, who we share it with, and your rights and choices when it comes to your personal data.

In this Privacy Policy, when we refer to "personal data", we mean information which could directly identify you (for example, your name or national insurance number) 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 gender or date of birth). "Process" or "processing" means just about any conceivable use of personal data, including recording, storing, viewing or disclosing personal data.

Shell Energy Retail Limited (company number 05070887) is the data controller of your personal data (referred to in this Policy as "Shell Energy" or "we").

If you have any questions about your personal data which are not answered by this Policy, please contact our Data Protection Officer:

Data Protection Officer  
Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way  
Coventry, CV4 8HS.

[dpo@shellenergy.co.uk](mailto:dpo@shellenergy.co.uk)

## 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, 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, 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 (if you are an energy customer)

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

To be sure that we're offering you the best option for your circumstances, we may request additional personal data to check whether you're eligible for certain tariffs or government discount schemes. This might include:

- Details of your household income
- Information about any health or medical conditions that you may have

If you feel you're in a vulnerable situation, we may ask you for and/ or process the following information so we can fulfil your request appropriately or place you on our Priority Service Register:

- Details of your health or medical conditions.
- If you choose to opt in to the Priority Service Register due to having a child/children in the household under 6 years of age, we will request the date of birth for the youngest child. This information will be shared with Network Distributors, in order to allow them to prioritise your property's supply should any issues occur. Once this child turns 6 years of age their date of birth will be removed from our systems and those of the Network Distributor.
- Any other information that you provide us with as part of your application.

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 home.
- Banking details, should you decide you would like to set up a direct debit with us.
- Documentation to support a change of name request, such as a marriage certificate, decree absolute or deed poll.
- 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 [www.shellenergy.co.uk](http://www.shellenergy.co.uk):

- Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to tell us how you're using our site, which in turn allows us to continually improve how the site works, looks and delivers information to users. We also use cookies to offer our website users a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

- Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- For more information on the cookies we use, the purposes for which we use them, the details we collect and how you can manage your preferences, please see our Cookie Policy at [www.shellenergy.co.uk/info/policies/cookies](http://www.shellenergy.co.uk/info/policies/cookies). By continuing to use our website you are agreeing to our use of cookies as described in our Cookie Policy.

## Information collected from other sources

We may obtain your personal data when you interact with us through third parties, such as price comparison websites and third party sellers.

Depending on the services you buy from us, we may also collect your personal data from sources such as credit reference agencies, industry data service providers, broadband and telecommunications infrastructure providers and government issued sanctions lists and media sources.

If you have a smart meter installed in your property, we'll automatically collect information regarding your energy consumption.

Price comparison websites and third party sellers:

- Your personal data will be passed onto us from price comparison websites 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:

- 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 your energy spent.
- For more information on your smart meter, please visit our website at [www.shellenergy.co.uk/smart-meters](http://www.shellenergy.co.uk/smart-meters)

Industry data service providers:

- If you're an energy customer, we'll receive information from national databases for the gas and electricity markets. This will include information such as unique identifiers linked to your meter and the location of the registered property.

Broadband and telecommunications infrastructure providers:

- If you're a broadband or telecommunications customer, we will also receive information on your usage from our broadband and telecommunications infrastructure providers. This could include your IP address and unique identifiers associated with your router.

#### 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.

#### Government issued sanctions lists and media sources:

- As a customer, your information will be screened against government issued sanctions lists and media sources pre-contract and on a periodic basis post-contract. This data may include personal data regarding suspected and actual criminal behaviour, criminal records or proceedings regarding criminal or unlawful behaviour but only for the purposes of ensuring our compliance with legal and regulatory obligations and/or to the extent permitted or required by local law. The purpose of this screening is to enable us to protect our assets and employees/contractors and specifically to ensure that we can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements. This screening does not result in any automated decision making.

## 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 such as Warm Home Discount, Green Deal and ECO, and our obligations under OFCOM.
- 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 trade control, anti-money laundering and/or bribery and corruption laws.

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, so that we can provide you with products and services that are best suited to your requirements.
- For management information (MI) reporting purposes and 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.

Where we have your consent:

- To place you on our Priority Service Register.
- To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences.

## Marketing:

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 text, telephone, email, SMS or post.

You can opt out or update your marketing preferences at any time by visiting My Account, or you can contact us by:

Telephone: 0330 094 5800

Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk)

Post: Customer Services, Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way, Coventry CV4 8HS.

### 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
- 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 tariff you are currently at
- The channels you use to interact with us
- Your eligibility for government schemes (such as the Warm Home Discount)
- Any other products and services you have purchased from us

You can opt out of profiling at any time by opting out of marketing. This can be done by visiting My Account, or you can also contact us by:

Telephone: 0330 094 5800

Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk)

Post: Customer Services, Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way, Coventry CV4 8HS.

### Credit checks:

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 live at the property you'd like Shell Energy to supply.
- The previous addresses you 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 <http://www.experian.co.uk/crain/index.html>

We will use this information to calculate a FUL 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 or provide you with a prepayment meter, before we set you up as a customer. If you are applying for our broadband or telecommunications services and you fail to pass our credit checks, we may refuse your application.

For more information about your rights in relation to decisions which are made based on automated processing, please see the "Data Subject Rights" section of this Privacy Policy.

## Sharing your personal data

### 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 Royal Dutch 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 Go+

Should you choose to sign up to the Shell Go+ loyalty programme, your email address will be shared with Shell Go+ to enable us to verify whether you are already an existing member. Should your eligibility to receive rewards change, this information will be communicated to Shell Go+. Your personal data will also be used for administrative purposes to aid us in providing you with these rewards.

For more information about how Shell Go+ will process your personal data, please visit their privacy policy at <https://www.shell.co.uk/privacy/b2c-notice.html>

### Other Third Parties

Please visit our website for a list of the data controllers that your personal data may be shared with.

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

- Broadband, telecommunications, energy and home 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.



- Warehouse storage and fulfilment centres, so that we can fulfil our orders and send our products and services to you.
- Price comparison websites, 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.
- Outsourced contact centres, who assist us in our customer service operations.
- Debt collection agencies, to help us recover any outstanding debt.
- 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, legal and tax services, to help us comply with our legal and regulatory obligations and to improve our services/operations.
- Distribution Network Operators (DNOs) and the police, should we be required to provide any information in order 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 management tools, to enable us to respond to any communications with you via our social media channels.
- 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 our Refer a Friend scheme.
- Independent organisations and charities, such as Citizens Advice, should you choose engage with us or raise a complaint through these channels.
- Telephone directories, if you inform us that you wish to be listed in a directory.
- Landlords, letting agencies and property managers, to communicate outstanding balances on your account.

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 or substantially all of its assets are acquired by a third party, in which case personal data held by Shell Energy will be one of the transferred assets.
  - iii. 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. ;

- (b) 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.
- (c) To protect the rights, property or safety of Shell Energy, 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 094 5800

Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk)

Post: Customer Services, Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way, Coventry CV4 8HS.

## Where is my personal data stored?

Shell Energy is based in the European Economic Area. However, we may have to share personal data with third parties located outside of the EEA or process your data ourselves outside of the EEA in countries, including (but not limited to) the United States, Canada and India. Your personal data may be processed by staff operating outside the EEA working for us, other members of our group or third party data processors for the purposes set out in this Privacy Policy.

When we do send personal data outside the EEA, we will ensure that appropriate safeguards are in place to protect your data in accordance with European data protection requirements, such as the General Data Protection Regulation (GDPR). These may include:

- Sending information to countries which have been deemed as having adequate protection by the EU.
- Entering into European Commission approved standard contractual arrangements with the third party, or in the case of US based service providers, ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>).
- Binding Corporate Rules for transfers among the Shell Group. You can request a copy of these by contacting [SITI-MLM-Support@shell.com](mailto:SITI-MLM-Support@shell.com) or [privacy-office-SI@shell.com](mailto:privacy-office-SI@shell.com)

For more information, please contact us by:

Telephone: 0330 094 5800

Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk)

Post: Customer Services, Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way, Coventry CV4 8HS.

## Security

Shell Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with. 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.

### How long do we keep this information?

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, OFCOM and the Department of Energy and Climate Change.
- 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.

## Data subject rights

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 contact us by:

Telephone: 0330 094 5800

Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk)

Post: Customer Services, Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way, Coventry CV4 8HS.

You have the following rights and choices in relation to your personal data:

1. You have the right to request access to a copy of your personal data. You are entitled to obtain confirmation that your data is being processed, access to a copy of your personal data, and other supplementary information which largely corresponds to the information that should be provided in a Privacy Policy. Should you wish to exercise this right, please contact us with a description of the information you would like to see. We will provide our response to you without undue delay and within one month of receipt of your request. Please note, however, that in certain circumstances we are not required to provide the information requested. Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may charge a reasonable fee taking into account the administrative costs of providing the information, or refuse to provide the information. Where we refuse a request, we will explain our reasons for the refusal, and remind you of your right to complain.

Certain personal data may be exempt from such requests in certain circumstances. If an exemption applies, we will tell you this when responding to your request. We may request that you provide us with information necessary to confirm your identity before responding to any request you make.

2. You have the right to ensure that any information we hold about you is accurate and kept up to date. Please let us know if you would like to update any inaccurate or incomplete records.
3. You have the right to request that we erase your personal data on the following grounds:
  - Your personal data is no longer necessary in relation to the purpose for which it was collected or processed
  - If the processing is based on consent, you choose to withdraw your consent and there is no other legal ground for processing
  - You object to processing, and there are no overriding legitimate grounds to continue the processing
  - Your personal data has been processed unlawfully
  - Your personal data must be erased for compliance with a legal obligation
4. You have the right to request the restriction of processing of your personal data under specific conditions, unless we have a lawful reason to continue, such as for the establishment, exercise or defence of legal claims.
5. You have the right to request a copy of personal data you have provided to us in a structured, commonly used and machine readable format, so that you can transmit this to another organisation. Where technically feasible you can also request that we transmit this data to another organisation.
6. You have the right to object to processing which is based on:
  - Legitimate interests
  - Tasks carried out in the public interest
  - Direct marketing

7. You have the right not to be subject to any decisions made based solely on automated processing, including profiling, which produces legal effects or significantly affects you. Where such decisions are made, you have the right to:
  - Obtain human intervention
  - Express your point of view
  - Obtain an explanation of the decision and challenge it

## Complaints

If you would like to make a complaint, please contact our Data Protection Officer:

Data Protection Officer  
Shell Energy, Shell Energy House, Westwood Business Park, Westwood Way  
Coventry, CV4 8HS.

[dpo@shellenergy.co.uk](mailto:dpo@shellenergy.co.uk)

You also have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office.

## 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.

The practices described in this Privacy Policy are current personal data protection policies, as of 25th March 2019.