### Privacy Notice: Solar Photovoltaic (PV) System Purchase and Installation.

### 1. Bord Gáis Energy and your personal information

This is the Bord Gáis Energy Limited Solar Photovoltiac (PV) Systems Privacy Notice. For all Solar PV System installations, the data controller is Bord Gáis Energy Limited. Bord Gáis Energy Limited is part of the Centrica group.

All our Privacy Notices are located at www.bordgaisenergy.ie/dataprotection.

If your Solar PV System is being delivered through our partnership with the Irish Farmer's Association (IFA), you can view their Privacy Policy <u>here</u>.

#### 2. Personal information we collect

We collect the following types of personal information from you:

- a) Your contact details: information that allows us to contact you directly and to deliver goods to you or to visit to carry out a service, repair, site inspection, design or installation your name, email address, telephone number, Eircode, MPRN, grant details linked to the PV Solar installation and addresses associated with your account.
- **b) Details of other people linked to your account:** if you have nominees, executors, or people with a power of attorney, their details will be linked to your account.
- c) Purchase information and account history: purchase history, credit/debit card details and bank account details you provide to make payment for the products and services you purchase from us including your payment method and history.
- **d) Previous service information:** information about previous use of services at your address including previous Solar PV Systems services at your address so we can determine when your Solar PV Systems were installed or when previous related works were carried out. This is to enable us to determine any matters relevant to the installation of Solar PV Systems at your property.
- e) Vulnerable Customer status: if you apply to be registered on our Special or Priority Services Register, you provide us with details of your advanced age and health status/conditions (for more details, see <a href="https://www.bordgaisenergy.ie/docs/publications/codes-of-practice/bge-special-services-register-v4.pdf">www.bordgaisenergy.ie/docs/publications/codes-of-practice/bge-special-services-register-v4.pdf</a> (for electricity) or <a href="https://www.bordgaisenergy.ie/docs/publications/codes-of-practice/BGE\_NG\_SSCOP\_0515.pdf">www.bordgaisenergy.ie/docs/publications/codes-of-practice/BGE\_NG\_SSCOP\_0515.pdf</a> (for gas).
- f) Records of your discussions with our customer support teams, including call recordings: when you share comments and opinions with us, ask us questions or make a complaint, including when you phone us, we will keep a record of this. This includes when you send us emails, letters, webchat, WhatsApp messaging, phone our support team or contact us through social media.
- **g) Identification information:** identification documents may be requested by us on occasion when dealing with customer queries.
- h) Credit information: information that allows us to understand your creditworthiness.
- i) Lifestyle and demographic insight information: we use regional demographic information to determine what products or services customers may be interested in.
- j) Responses to surveys, competitions, and promotions: we keep records of any surveys you respond

- to or your entry into any competition or promotion we run.
- **k)** How you use mobile applications and websites: when you use our applications or websites, we collect information about the pages you look at and how you use them, your device type, operating system and browser type.
- 1) Location information: your smartphone or computer's IP address may tell us an approximate location when you connect to our websites, but this will be no more precise than the city, county or country you are using your device in. We may also process photos and videos of your property to facilitate design and installation of the Solar PV systems.
- **m)** Advertising and Direct Marketing: information about how you respond, or interact with, any direct marketing or advertising communications directed to you, including any requests for these communications to stop.

You're not required to provide any of the personal information described above to us, however, if you do not do so, you may not be able to set up an account with us, or the functionality of our products or services may be reduced.

## 3. What do we use your personal information for?

We process some of your personal information to fulfil the contract between us:

Purpose	Personal information used
Solar PV System design, installation and follow-on	All the data listed in categories a-g of section
technical support in addition to quotation, order	2 above
management and survey of your property	
Maintaining your account, billing you and	All the data listed in categories a-g of section
taking payment for our products and	2 above
services	
Answering your queries or complaints	All the data listed in categories a-g of section
	2 above
To deliver Solar PV System service	Your contact details and account history
communications	
Debt collection and debt management	All the data listed in categories a-g of section
	2 above

We process the following personal information because we have other legal obligations to do so:

Purpose	Personal information used
Detecting, preventing, or investigating	All the personal information we collect
crime or suspected crime	
Attending to emergency situations	Contact details
	• Accountinformation and details of
	other people linked to your account
	Previous service information

	• Vulnerability information (e.g. if you are a listed as a Special or Priority Services customer)
Complying with obligations imposed by our regulators and statutory bodies such as the SEAI.	• The personal data we use will depend on the nature of the issue but will often include all the data listed in categories a-g of section 2 above
Internal and statutory audits.	All personal information we collect as listed in Section 2

We process the following personal information to ensure our customers, staff or agents are protected from harm:

Purpose	Personal information used
Health and Safety of our customers, staff	Account information and service history
and contractors	Site survey and installation information
	Records of your discussions with our customer support teams and on-site installers.

We process the following personal information because we have a legitimate interest to do so:

Purpose	Personal information used
Maintaining and improving our products and	• All the personal information we collect as
services e.g. optimising pricing structures and	listed in Section 2 (but not your payment
business operations, analysing performance of	details)
advertising and marketing	
Staff training	• All the personal information we collect as
	listed in Section 2 (but not your payment
	details)
Developing new products and services, and	• All the personal information we collect as
determining products and services that may be	listed in Section 2 (but not your payment
of interest to you e.g. by understanding	details)
demographics to determine the most relevant	
products and services for customers' needs	
Market surveys, research and analytics	• All the personal information we collect as
	listed in Section 2 (but not your payment
	details)
Direct marketing our similar products and	Contact details
services (only in accordance with your	Marketing preferences set by you

marketing preferences, and you will always be	Purchase history
given the opportunity to unsubscribe)	
Making credit decisions	Contact details
	Payment information and account history

We process some of your personal information because you have provided your consent to the processing, however you may revoke your consent at any point, by contacting us at <a href="mailto:dataprotection@bordgais.ie">dataprotection@bordgais.ie</a> or Data Governance Officer, Bord Gáis Energy Limited, PO Box 10943, Dublin 2, or at <a href="mailto:www.bordgaisenergy.ie/dataprotection/#opt-out">www.bordgaisenergy.ie/dataprotection/#opt-out</a>:

Purpose	Personal information used
Direct marketing a wider range of our products	Contact details
and services or those of third parties (only in	Account information and history
accordance with your marketing preferences,	Rewards information
and you will always be given the opportunity to	Purchase and account history
unsubscribe) e.g. where you are a member of our	
Rewards Club	

### Where we process your personal data so you can't be identified any more

We may anonymise and aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and developing new products and services.

### 4. Sources we collect your personal information from

We'll collect personal information from the following sources:

- **Directly from you:** when you set up an account with us, purchase products or services from us, submit information via our websites or apps, complete forms we provide to you, enter our competitions and promotions, make a complaint, contact us by phone, email or communicate with us directly in some other way.
- From the IFA: following your expression of interest for installation of Solar PV System and initial site survey, the IFA will provide us with information to assist us with the design and costing of an appropriate solution for installation at your property.
- Other entities/companies we work with: to provide us with information to help us deliver our products and services to you. These include:
  - Contracted service engineers/installers: these entities will provide us with information about your site and Solar PV Systems surveys and installation carried out by them so that we can manage your account.
  - Companies in the Centrica group: who may provide relevant information about the products and services bought from them.
  - o **Payment services providers:** if you authorise a third party to process your payments,

- payment information will be provided to us from that third party.
- Other companies' apps and products: provide us with information if you connect them to our products or services, including social media providers. Companies to whom you apply for finance: Where you apply for finance with an entity providing credit solutions such as Finance Ireland, we will process information regarding the loan amount, the status of your loan application and your contact details to enable us to deliver our services to you.

## 5. Who we share your personal information with.

We share personal information with the following parties. We always have contracts/data sharing agreements in place with these entities, obligating them to protect your data:

- Contracted service engineers: so that they can book appointments with you and provide the services that you request including site surveys, installation and maintenance.
- Companies involved and design, sourcing, costing, and installation of Solar PV Systems: In order to provide you with this service it is necessary for Bord Gáis Energy to engage and share your personal data with other third parties to assist us with the design of a suitable solution for your property, to enable the monitoring and performance of your system, to assist in the irradiance analysis of your system, to help identify the components to build your system, to commission and to monitor your Solar PV system.
- Companies in the Centrica group: to provide a service to you, and for cross-marketing activities, but only in accordance with your marketing preferences.
- Networks Companies: ESB Networks to register you as our customer, for them to read the meter at your home, to carry out siteworks at your home, to register you as a Vulnerable Customer on their database or in the event of a Supplier of Last Resort situation or where we need to share information in order to deal with a complaint that you raise. We may disclose information when required by legal process for investigations by the Networks Companies
- Any party approved by you: which for the installation of Solar PV Systems includes the IFA and BER assessors and if you take part in the Bord Gáis Energy reward or loyalty schemes, or if you ask us to transfer your data to another company.
- Advertising/Marketing partners: so that we can run advertising campaigns and conduct
  market research and analysis. This may include social media sites such as Facebook, Instagram,
  Twitter and Google Ads. Any information provided to these third parties will be pseudonymised by
  hashing so that your information cannot be directly identified.
- Other service providers and advisors: companies that support our IT, help us analyse the data we
  hold, process bills and payments, send communications to our customers, provide us with legal or
  financial advice, carry out debt collection services and customer satisfaction/experience surveys.
   Companies whom we use as our field sales service providers.
- **Purchasers of our business:** buyers or prospective buyers who we sell or negotiate to sell our business to.
- Government bodies or our regulators: where we are required to do so by law or to assist with their investigations or initiatives, or are part of industry information sharing schemes, including the Data Protection Commission, Commission for Regulation of Utilities, Sustainable Energy Authority of

Ireland (SEAI), ESB Networks (ESBN) and the Central Bank of Ireland. Where relevant we may also share with the Department of Agriculture, Food and the Marine who operate the Targeted Agriculture Modernisation Scheme (TAMS).

- **Industry supervisory bodies**: we may pass your information on to organisations that supervise the industry, like Safe Electric and the Register of Electrical Contractors Ireland (RECI).
- The Garda Síochána and law enforcement agencies: to assist with the detection, investigation prevention and prosecution of crime and preventing a threat to national security, defense or public security.

We do not disclose personal information except as set out above. We may provide third parties with aggregate statistical information and analytics about users of our products and services and we will make sure no one can be identified from this information before we disclose it.

### 6. Direct Marketing

**Email, telephone, postal and SMS marketing:** from time to time, Bord Gáis Energy or the Centrica group may contact you by email, social media sites, telephone (mobile and landline), post or SMS with information about products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set when you create your account or that you tell us afterwards you are happy to receive.

You can also unsubscribe from our marketing by following the unsubscribe instructions in email or SMS communications that we send to you. You can then let us know at any time that you do not wish to receive marketing messages by completing this online web form <a href="https://www.bordgaisenergy.ie/dataprotection/#opt-out">www.bordgaisenergy.ie/dataprotection/#opt-out</a> or call us on 01 611 01 01. You can opt-out by marketing type (e.g. email, SMS, etc.) as we know our customers may be happy to receive one form of marketing but not another.

### 7. Tailored advertising and cookies

We work with our advertising partners, including social media sites and providers, to show you advertising about our products and services, and those offered by group companies and services. This takes place on websites or apps where our partners have advertising space or direct marketing to your premises. To do this, some of our advertising partners provide us with aggregated, non-personal geographical and demographic information. Other partners use information about the websites, apps, social media content and ads you interact with or view when connected to the Internet, to make sure the advertising you see is more relevant to you, as well as information which we provide to them. Typically, cookies and similar technologies are used to provide this type of advertising online. You can find out more about cookies and how to manage their use by reading our cookie notice.

### 8. Profiling, analytics & automated decision making.

We may analyse your personal data using automated means in order to help us understand your needs

and to develop our relationship with you. We will also use your information to offer you products and services that we believe you may be interested in. We may also use your consumption data to offer you smart services and products. Where we do this, we will always respect your marketing preferences. We may also use your personal data to make credit decisions regarding you. Where we make solely automated decisions that produces a legal or other significant effect, you will have the right to request a review of that decision and provide information to support any such review.

#### 9. Transferring your personal information internationally

To install Solar PV Systems for you, we work with partners which transfer and store data in various regions which include Australia, United States of America, India, Philippines and China. As these jurisdictions are outside of the EEA, their privacy laws are considered to be less protective than those within the EEA. Where we transfer personal data to a country not determined as providing an adequate level of protection for personal data, we will endeavor to ensure that the transfers are done under an agreement which covers the requirements for the transfer of personal data such as the <a href="European Commission Standard Contractual Clauses">European Commission Standard Contractual Clauses</a>.

### 10. How long do we keep personal information for?

We'll keep your personal information for as long as you have an account with us. Your account is deemed active for the duration your Solar PV System is under warranty by the manufacturer. After you close your account with us we'll keep your personal information for a period to maintain our records, to respond to your queries, for safety reasons, for bill reconciliation purposes and to meet legal and regulatory obligations. The periods that we keep information for are subject to change as required by legal obligations on us. Where a customer has attempted to close their account but there is outstanding debt or credit balance on the account then these accounts will be classed as current customers and will remain open until the debt is paid.

#### 11. Your rights in relation to your personal information

You've the following rights in relation to your personal information: (i) the right to be informed about how your personal information is being used; (ii) the right to access the personal information we hold about you; (iii) the right to opt-out of receiving direct marketing messages; (iv) the right to request the correction of inaccurate personal information we hold about you; (v) the right to request the blocking or deletion of your personal information in some circumstances and; (vi) the right to request that we port elements of your data either to you or another service provider.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the office of the Data Protection Commission:

by post to the Office of the Data Protection Commission, 21 Fitzwilliam Square South,
 Dublin 2, D02 RD28, Ireland

- $\Box$  by phone +353 (01) 7650100 or 1800437737; or
- by webform at <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a>

# 12. Contacting Us

We're here to help and encourage you to contact us <u>dataprotection@bordgais.ie</u>, or write to us at: Data Protection Officer, Bord Gáis Energy Limited, PO Box 10943, Dublin 2 or call 01 611 01 01

We may update this privacy notice from time to time to ensure it is always up to date and accurate. Any changes we may make to our privacy notice will be posted on this page, and we'll communicate any significant changes to you.

Version dated March 2024.