

## **Privacy Notice: Electric Vehicle (EV) Charger services**

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

This is the Bord Gáis Energy Limited EV Charger services Privacy Notice. For all EV Charger services provided by us, the data controller is Bord Gáis Energy Limited. Bord Gáis Energy Limited is part of the Centrica group. All of our Privacy Notices are located at [www.bordgaisenergy.ie/dataprotection](http://www.bordgaisenergy.ie/dataprotection).

### **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 you to carry out an EV Charger installation - your name, email address, telephone number and addresses associated with your purchase.
- b) Purchase information and history:** purchase history, credit/debit card details you provide to make payment for the products and services you purchase from us.
- c) Previous service information:** information about previous EV Charger services at your address so that we can determine when your EV Charger was installed or when previous related works were carried out.
- d) 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 may keep a record of this. This includes when you send emails to our support team or contact us through social media.
- e) Lifestyle and demographic insight information:** we use regional demographic information to determine what products or services customers may be interested in.
- f) 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.
- g) 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.
- h) 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.
- i) 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.
- j) Exercising your rights:** If you exercise any of your rights under Data Protection law, we will keep a record of this and how we respond.

You are not required to provide any of the personal information described above to us, however, if you do not do so, 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:

<b>Purpose</b>	<b>Personal information used</b>
<b>EV Charger services</b>	<ul style="list-style-type: none"><li>• All the data listed in categories a-e of section 2 above</li></ul>
<b>Billing you and taking payment</b>	<ul style="list-style-type: none"><li>• All the data listed in categories a-e of section 2 above</li></ul>
<b>Answering your queries or complaints</b>	<ul style="list-style-type: none"><li>• All the data listed in categories a-e of section 2 above</li></ul>
<b>To deliver EV Charger communications</b>	<ul style="list-style-type: none"><li>• Your contact details and purchase history</li></ul>
<b>Debt collection</b>	<ul style="list-style-type: none"><li>• All the data listed in categories a-e of section 2 above</li></ul>

We process the following personal information because we have a legal obligation to do so:

<b>Purpose</b>	<b>Personal information used</b>
<b>Detecting, preventing or investigating crime or suspected crime</b>	<ul style="list-style-type: none"><li>• All the personal information we collect</li></ul>
<b>Attending to emergency situations</b>	<ul style="list-style-type: none"><li>• Contact details Previous service information</li></ul>
<b>Complying with obligations imposed by our regulators</b>	<ul style="list-style-type: none"><li>• The personal data we use will depend on the nature of the issue but will often include all the data listed in categories a-e of section 2 above</li></ul>
<b>Internal and statutory audits</b>	<ul style="list-style-type: none"><li>• All personal information we collect as listed in Section 2</li></ul>

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

<b>Purpose</b>	<b>Personal information used</b>
<b>Health and Safety of our customers, staff and contractors</b>	<ul style="list-style-type: none"><li>• Purchase information and history</li><li>• Records of your interactions with our customer support teams</li></ul>

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

<b>Purpose</b>	<b>Personal information used</b>
<b>Maintaining and improving our products and services</b> e.g. optimising pricing structures and business operations, analysing performance of advertising and marketing	<ul style="list-style-type: none"><li>• All the personal information we collect as listed in Section 2 (but not your payment details)</li></ul>

<b>Staff training</b>	<ul style="list-style-type: none"> <li>• All the personal information we collect as listed in Section 2 (but not your payment details)</li> </ul>
<b>Developing new products and services, and determining products and services that may be of interest to you</b> e.g. by understanding demographics to determine the most relevant products and services for customers' needs	<ul style="list-style-type: none"> <li>• All the personal information we collect as listed in Section 2 (but not your payment details)</li> </ul>
<b>Market surveys, research and analytics</b>	<ul style="list-style-type: none"> <li>• All the personal information we collect as listed in Section 2 (but not your payment details)</li> </ul>
<b>Direct marketing our similar products and services (only in accordance with your marketing preferences, and you will always be given the opportunity to unsubscribe)</b>	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Marketing preferences set by you</li> <li>• Purchase history</li> </ul>

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 [dataprotection@bordgais.ie](mailto:dataprotection@bordgais.ie) or Data Governance Officer, Bord Gáis Energy Limited, PO Box 10943, Dublin 2:

<b>Purpose</b>	<b>Personal information used</b>
<b>Direct marketing a wider range of our products and services or those of third parties (only in accordance with your marketing preferences, and you will always be given the opportunity to unsubscribe)</b> e.g. where you are a member of our Rewards Club	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Marketing preferences set by you</li> <li>• Purchase information and history</li> <li>• Rewards information</li> </ul>

#### **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 will collect personal information from the following sources:

- **Directly from you:** when you 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.

- **Other entities/companies we work with:** provide us with information to help us deliver our products and services to you. These include:
  - **Contracted EV Charger installation engineers:** these entities will provide us with information about your EV Charger and installation carried out by them.
  - **Our partners in the motor industry such as car manufacturers and dealers:** who may provide relevant information about your EV and associated products bought from them.
  - **Companies in the Centrica group:** who may provide relevant information about the products and services bought from them.
  - **Other companies' apps and products:** provide us with information if you connect them to our products or services, including social media providers

## 5. Who we share your personal information with

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

- Contracted installation engineers: so that they can book appointments with you and provide the services that you request.
- Our partners in the motor industry – car manufacturers and dealers to assist us in the provision of our service to you.
- Companies in the Centrica group: to provide a service to you, and for cross-marketing activities, in accordance with your marketing preferences.
- Any party approved by you: including, 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 conduct customer satisfaction/experience surveys.
- 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), and the Central Bank of Ireland.
- Industry supervisory bodies: we may pass your information on to organisations that supervise the industry, like the National Electrical Contractors Ireland (NECI).

- Garda Síochána and law enforcement agencies: to assist with the detection, investigation prevention and prosecution of crime.

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, telephone (mobile and landline), post or SMS with information about EV products and services we believe you may be interested in. We will only send marketing messages to you in accordance with your marketing preferences 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 let us know at any time that you do not wish to receive EV marketing messages by sending an email to [evcharger@bordgais.ie](mailto:evcharger@bordgais.ie) with OPT OUT as the subject line. Please allow 10 working days for your preference to be processed. 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/profiling**

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:

[www.bordgaisenergy.ie/website-terms/#cookie-notice](http://www.bordgaisenergy.ie/website-terms/#cookie-notice)

## **8. Transferring your personal information internationally**

In providing our services, we work with partners which transfer and store data in India and in the Philippines. As these jurisdictions are outside of the EEA and their privacy laws are considered to be less protective than those within the EEA, we have ensured that appropriate safeguards are in place by entering into standard contractual clauses, which have been approved by the European Commission, with these partners <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

## **9. How long do we keep personal information for?**

We will 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.

#### **10. Your rights in relation to your personal information**

You have 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 Data Protection Commission, Office of the Data Protection Commission, 21 Fitzwilliam Square south, Dublin 2, D02 RD28, Ireland.

Phone +353 (0)761104800 or +353 (0)57864800 | email [info@dataprotection.ie](mailto:info@dataprotection.ie).

#### **11. Contacting Us**

We are here to help and encourage you to contact us [dataprotection@bordgais.ie](mailto:dataprotection@bordgais.ie), or write to us at: Data Governance Officer, Bord Gáis Energy Limited, PO Box 10943, Dublin 2 or call 01 611 01 01 to resolve your complaint first.

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