

Staffordshire Chambers of Commerce.

(Last Updated: 20 May 2021)

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

Who we are;
Changes to this website privacy policy;
Our website;
Our collection and use of your personal information;
How is your personal data collected?
Our legal basis for processing your personal information
Who we share your information with
Cookies and similar technologies;
Transfer of your information out of the EEA;
Keeping your personal information secure
Third Party Links
Data Retention
Your rights;
How to complain;
How to contact us;
Do you need extra help?
Who we are

This website (www.staffschambersenergyservices.co.uk) (Site) is brought to you by Troo Ltd of 1 Azure Court, Doxford International Business Park, Sunderland, SR3 3BE (we, our or us). We are committed to protecting and respecting your privacy.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

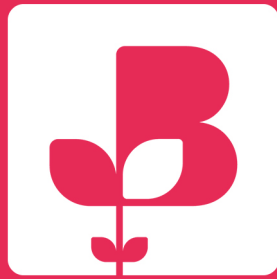
This policy (together with our terms and conditions of use and any other documents referred to in those terms) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our service is not available to consumers. Please do not provide any personal data to us if you are not contacting us on behalf of a business.

Changes to this website privacy policy

This website privacy policy was published on [insert date] and last updated on [insert date].

We may change this website privacy policy from time to time, and any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



Staffordshire
Chambers of
Commerce.

Our website

This privacy policy relates to your use of our website only.

1. Our collection and use of your personal information

We may collect and process the following data about you:

Information you give us

You may give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Site, subscribe to our service, search for a provider, accept a bid for services, participate in discussion boards or other social media functions on our Site, enter a competition, promotion or survey, and if you report a problem with our Site. The information you give us may include your first name, last name, address, e-mail address and phone number, meter point administration number (MPAN) financial and credit card information, personal description and photograph, credit history and utilities usage.

If you enter your meter information, including MPAN into our Site in order to check the prices you could be paying, without creating a Troo Cost account, we do not use this information unless you contact us or ask to be contacted.

Information we collect about you

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

With regard to each of your visits to our Site we may collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;

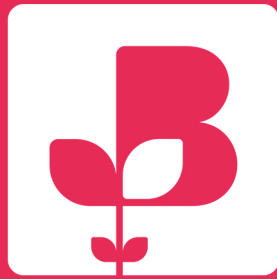
This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

This website is not intended for use by children under the age of 18 and we do not knowingly collect or use personal information relating to children.

Information we receive from other sources

We may receive information about you if you use any of the other Sites we operate or the other services we provide. We are also working closely with third parties (including, for example, energy providers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, utility providers) and may receive information about you from them which we will add to the information which we already hold about you in order to help us prepare a customer profile about you to show potential providers.



Staffordshire
Chambers of
Commerce.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you quotes from potential providers). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

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 data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to use a service;
- create an account on our Site;
- subscribe to our service;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our Site, we may automatically collect information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy for further details.

Third parties or publicly available sources. We may receive personal data about you from analytics providers such as Google based outside the EU, or your personal data from your current energy provider.

Informing us of changes: It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

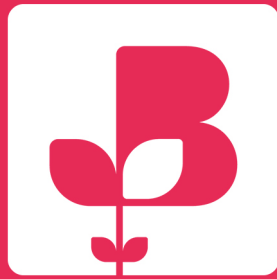
Information about other people: If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can give consent on his/her behalf to the processing of his or her personal data and receive on his/her behalf any data protection notices.

Monitoring: We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Credit checking: To enable us and other companies in our group to make credit decisions about you and for fraud prevention and money laundering purposes, we may search the files of credit reference and fraud prevention agencies (who will record the search). We may disclose information about how you conduct your account to such agencies and your information may be linked to records relating to other people living at the same address with whom you are financially linked. Other credit grantors may use this information to make credit decisions about you and the people with whom you are financially associated, as well as for fraud prevention, debtor tracing and money laundering purposes. If you provide false or inaccurate information and we suspect fraud, we will record this.

3. Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.



Staffordshire
Chambers of
Commerce.

The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- vital interests: where our use of your personal information is necessary to protect you or someone else's life
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

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.

Note that we may process your personal data for more than one lawful ground 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

To manage our relationship with you which will include:

(a) Notifying you about changes to our terms or privacy policy

(b) Asking you to leave a review or take a survey

(c) send you an email to confirm when your renewal date is

(d) Contacting you, as and when requested, or following up any query you may send to us.

Contact (a) Performance of a contract with you

(b) Necessary to comply with a legal obligation

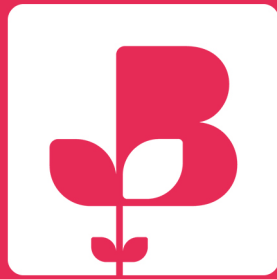
(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey Contact (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)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and the full URL. (Technical) (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



**Staffordshire
Chambers of
Commerce.**

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you Technical, Contact 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)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences Technical 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)

To make suggestions and recommendations to you about goods or services that may be of interest to you Contact Necessary for our legitimate interests (to develop our products/services and grow our business)

To send marketing information to you (other than about similar goods or services stated above) Contact legitimate interest

Who we share your personal information with

We may combine this information with information you gave to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending upon the types of information we receive).

We will share personal information with law enforcement or other authorities if required by applicable law.

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. analytics and search engine providers that assist us in the improvement and optimisation of our Site; and credit reference agencies for the purpose of assessing your credit score.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, law firms in NE1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

We may disclose your personal information to third parties:

in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

if all, or substantially all, of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and

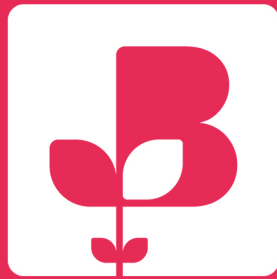
if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Cookies and similar technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on our use of cookies, please see our Cookies Policy

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.



**Staffordshire
Chambers of
Commerce.**

Transfer of your information out of the EEA

We may transfer your personal information to the following which are located outside the European Economic Area (EEA).

Such countries do not have the same data protection laws as the United Kingdom and EEA. Whenever we transfer your personal data out of the EEA, 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 by the European Commission.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

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

Keeping your personal information secure

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. However, the transmission of information via the internet is not completely secure. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data Retention

By law we have to keep basic information about our customers (including name and meter information) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Right to be forgotten below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Third Party Links

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

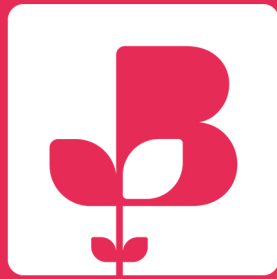
Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data.



**Staffordshire
Chambers of
Commerce.**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complain you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

email, call or write to us as per the "How to Contact us Section" below;

let us have enough information to identify you (eg account number, user name, registration details),

let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

let us know the information to which your request relates, including any account or reference numbers, if you have them.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

How to contact us

Questions, comments and requests regarding this privacy policy are welcomed, please either contact us by:

Email: energyservices@staffordshirechambers.co.uk or hello@troocost.com

Post: 1 Azure Court, Doxford International Business Park, Sunderland, SR3 3BE

Telephone: 0808 164 2222