

Your privacy dashboard

Hello, we are Tonik Energy Limited (known by the name of “Tonik Energy” or just “Tonik”). Here is a short summary of how we process and protect your data and respect your privacy. For further information please see our [full Privacy Policy](#) or click on the dynamic links in the table below

Types of data we collect

- Contact details
- Account information
- Financial information
- Data about your energy usage
- Data that identifies you & other people
- Data on how you use Tonik Energy

[Tell me why](#)

How we use your data

- To provide you with services to keep the lights on & keep you warm!
- To keep Tonik Energy running
- To help us improve Tonik Energy
- To give personalised member support and information
- To send you marketing messages (but only if you tell us to)

[How exactly?](#)

Third Parties who process your data

The following are some of the services that help us keep Tonik Energy running by storing or processing your data:

- Energy services: National Grid, ECOES
- Infrastructure: Microsoft
- Communications: Foehn, Mailchimp
- Payments: GoCardless, PayPoint
- Analytics: Google Analytics
- Integrations: (by your request) Facebook

[What do they do?](#)

Know your rights

Your rights include

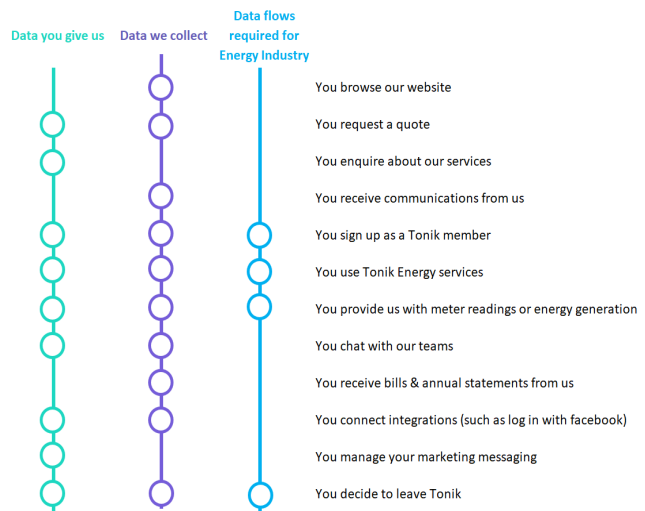
- Access information we hold on you
- Have your data corrected
- Opt-out of marketing comms
- Port your data to another service
- Be forgotten by Tonik
- Complain about us

[What can I do?](#)

When and how we collect data

We collect data from people browsing our website, people chatting to us online, social media or on the phone, members of Tonik Energy and people who use our services such as refer a friend.

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by the energy industry. Here is a visual representation that explains when and how we do this.



[Is my data included?](#)

We use cookies

- Why? We use necessary cookies to run and improve the service to you
- Our third-party service providers use cookies too, which they control
- You can turn off cookies but this will mean for example that we can't recognise you online or we can't resolve issues so efficiently

[How can I manage cookies?](#)

Tonik Energy Privacy Policy

At Tonik Energy we want to get to know you, but we want you to know that we are committed to protecting and respecting your privacy. This Privacy Policy explains how and why we use your personal data, to make sure you stay informed and can be confident about entrusting us with your data.

Contents

| | |
|--|----|
| 1. Who are we?..... | 3 |
| 2. Our responsibilities and role in your privacy..... | 3 |
| 3. Your responsibilities..... | 3 |
| 4. Our data privacy commitment to you..... | 3 |
| 5. When and how we collect your personal data..... | 4 |
| 6. Types of data that we collect..... | 5 |
| 7. How and why we use your data..... | 6 |
| To provide you with products & services and fulfil our contractual agreement with you..... | 6 |
| To comply with our legal obligations..... | 8 |
| Because it is in our legitimate interests as a business to use your information:..... | 9 |
| Where we have your consent:..... | 11 |
| Where we process your personal data so you cannot be identified any more..... | 12 |
| 8. Sources we collect your data from..... | 13 |
| 9. Third parties who process your data..... | 15 |
| Industry & energy service provision..... | 15 |
| The Government or our regulators..... | 16 |
| Financial services including payment partners, debt collection, credit checking & fraud..... | 17 |
| Infrastructure..... | 17 |
| Analytics..... | 17 |
| Integrations (by your request) & social media..... | 17 |
| Communications..... | 18 |
| 10. How we use cookies..... | 18 |
| We use the following cookies:..... | 18 |
| How can I block cookies?..... | 18 |
| 11. Your privacy choices and rights..... | 20 |
| Your Choices..... | 20 |
| Your Rights..... | 20 |
| How to exercise your rights..... | 21 |
| 12. How long do we store your data?..... | 22 |
| 13. Information Security..... | 22 |
| 14. Making this Privacy Policy great..... | 22 |

1. Who are we?

We are Tonik Energy Limited (Company No. 9812673). We provide our members with access to 100% renewable electricity, sustainable green gas and the option to offset carbon emissions. Our aim is to connect our members to new technologies and innovative ways to power their home.

In this Privacy Policy, whenever you see the words 'we', 'us', 'our' it refers to Tonik Energy Limited.

How can you contact our team?

Telephone: 0333 3442686

Email: hello@tonikenergy.com or our Data Protection officer can be contacted at privacy@tonikenergy.com

Post: Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT

2. Our responsibilities and role in your privacy

If you are a Tonik customer, if you use any of our products or services, if you've recently moved into a property that we supply, enquire about our services, take part in our market research activities, interact with us online, email, live chat, call or write to us, or just visit our website, this Privacy Policy applies to you and we act as the 'data controller' of your personal data. This means we determine how and why your personal data is processed.

If you are a supplier or a member of staff (current team member, job applicant or previous team member) we have created specific policies for you and they will have been made available to you at the appropriate point in time.

We are registered as a data controller at the UK Information Commissioner's Office under number [ZA197616](#)

3. Your responsibilities

- ✓ To read this Privacy Policy
- ✓ If you are our a Tonik customer, please also check the terms and conditions and policies between us as they may contain further details on how we collect and process your data.
- ✓ If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information to us, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

4. Our data privacy commitment to you

Tonik 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. This includes how and why we process your personal data, who we share it with, and lots of information about your rights and choices when it comes to the processing of your personal data.

We'll keep this Privacy Policy updated to show you all the things we do with your personal data. In certain circumstances we may also provide an extra privacy notice, which will always refer to this page.

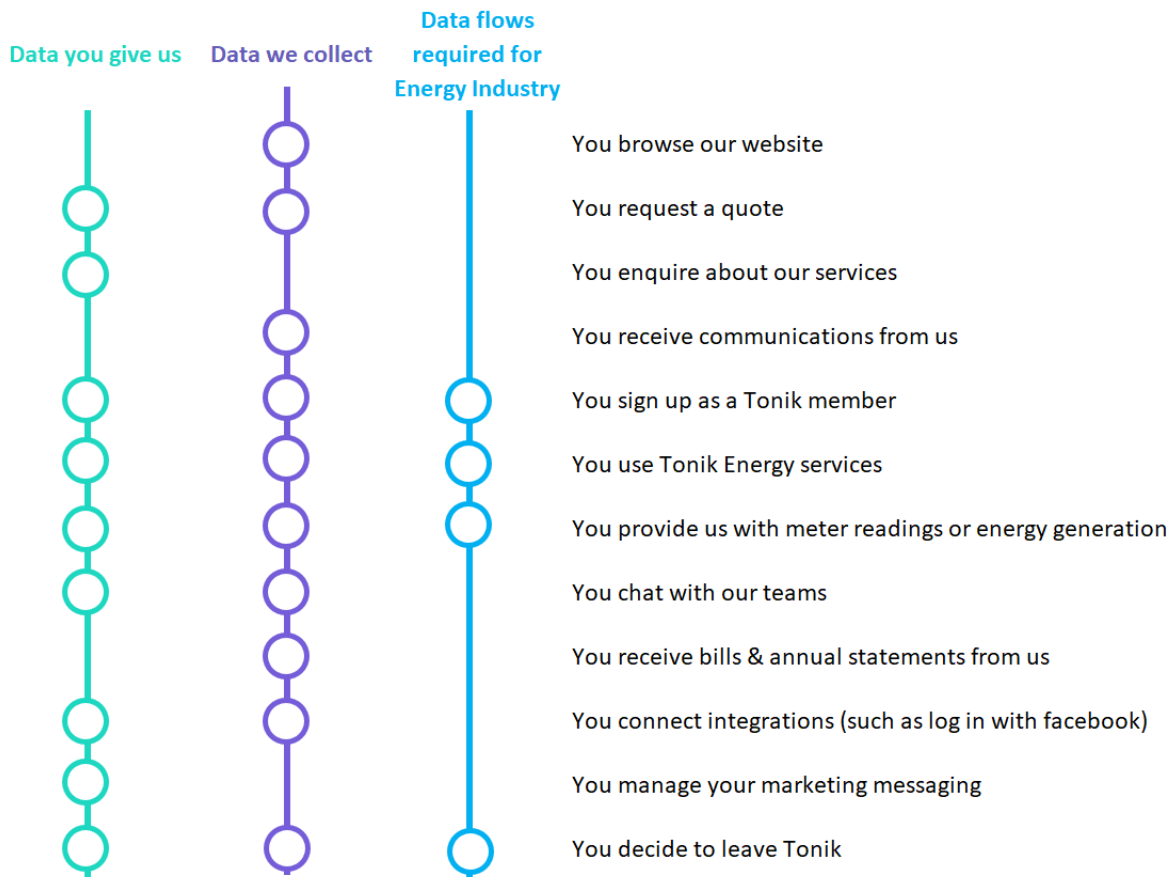
5. When and how we collect your personal data

From the first moment you interact with Tonik, we are collecting data.

Sometimes you provide us with data, sometimes data about you is collected automatically and sometimes the energy industry or other organisations such as price comparison websites will provide us with data about you.

Included below is a visual representation we've created that explains when and why we do this.





Some of the interactions illustrated may happen multiple times within your journey with us (e.g. you receive communications from us, or you enquire about service) or in a different order, so each journey will be unique, but we hope this will allow you to develop and understand where there are touch points and interactions are between your data, our business and the wider energy industry.



6. Types of data that we collect

'Personal data', or 'personal information', means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

| | |
|---|--|
|  | <p>Your contact details</p> <p>Your name, contact address, supply address, telephone number, email address, title, name and contact details of individuals authorised to access your account...</p> |
|  | <p>Financial & transaction information</p> <p>Your bank account number, sort code, bank details you provide to make payment for the products and services you purchase from us.</p> <p>Purchase and account history relating to the products and services which you have purchased or used, deliveries we have made to you. Information that allows us to understand your creditworthiness and financial position. If you pay someone else's bill, we will have a copy of your payment information. If someone else pays your bill, we will have a copy of their information linked with your account.</p> <p>Please note we do not store any data that allows card payments to be made – this data is handled by our secure third party GoCardless who are PCIDSS compliant.</p> |
|  | <p>Your account information</p> <p>Unique account number, date of birth, contract details, household details, previous address history, property type, tariff details, marketing preferences, incident details, dispatch appointment details, and notes added to your account.</p> |
|  | <p>Our communication with you</p> <p>Records of your discussions with our members services team and other staff members, including call recordings, webchat and emails.</p> <p>When you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes when you send us emails, phone our Member Services Team or contact us via webchat or through social media such as through Twitter or on Facebook.</p> <p>Exercising your rights: if you exercise any of your statutory rights under data protection law, we will also keep a record of this and how we respond.</p> |
|  | <p>Details of other people linked to your account</p> <p>Nominees, executors, or people with a power of attorney and their details, or someone else set up to pay your bill, landlord or rental agency, housing association, previous supplier, proposed new supplier.</p> |
|  | <p>Data about your energy equipment, usage and property details</p> <p>Supply start date, meter and gas point numbers, meter details, property details, energy use, energy consumption levels and pattern, energy generation, ancillary energy products (e.g. home battery) meter readings, meter technical details, tariff. Photos and images, but only if you share photo's or other images of your property with us. If you have a smart meter installed at your property we'll also capture your energy consumption data (please see our FAQ on smart metering here) .</p> |
|  | <p>Technical data that identifies you</p> <p>Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.</p> |
|  | <p>Data on how you use Tonik services</p> <p>Information about how you use our website, products and services.</p> <p>Your URL clickstreams (the path you take through our site), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.</p> <p>Responses to surveys, competitions and promotions, including records of any surveys you respond to or your entry into any competitions we run.</p> |
|  | <p>Sensitive data</p> <p>If you feel that either yourself a member of your household are in a vulnerable situation and needs extra care (for example due to age, the presence of young children, health or medical conditions, disability or financial circumstances), we will collect the information you share with us so that we can fulfil your request appropriately or place you on the Priority Service Register (PSR).</p> <p>Information passed to us by the Police, Crime Stoppers or Action Fraud.</p> |

| | |
|---|--|
|  | <p>Other types of data</p> <p>We also use aggregated data, to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity. Any other information that you provide us with as part of your application</p> |
|  | <p>Data about changes of circumstance</p> <p>Should your circumstances change, we may also ask for the following to allow us to service your account:</p> <ul style="list-style-type: none"> • Documentation to support a change of name request such as a marriage certificate, decree absolute or deed poll. • Documentation to help us manage an account in cases requiring 'Property and financial affairs lasting power of attorney'. • Documentation to help us transfer or close an account in the case of a bereavement, such as death certificates, solicitors' correspondence, wills or probate documents. |
|  | <p>Enquiries or complaints</p> <p>We will obtain or request the following information if you contact us with an enquiry or complaint.</p> <ul style="list-style-type: none"> • Any information that you disclose to us as part of your enquiry or complaint. • All the personal data which is necessary for us to deal with your enquiry, question or complaint, which will depend on the nature of your request. This may include: bills from your previous supplier, tenancy agreements, legal documentation, and copies of cheques or bank statements. |
|  | <p>Children's data</p> <p>Tonik is a business-to-consumer service directed to and intended for use only by those who own or rent their own homes. We do not target at children, and we do not knowingly collect any personal data from or about children with the exception of those who do have a household account with us or data for inclusion on the Priority Service Register (PSR)</p> |

7. How and why we use your data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

To provide you with products & services and fulfil our contractual agreement with you

We process your personal data where is necessary for a contract that you have with us, or because we have asked you to take specific steps before entering into that contract.

| Reason or purpose | Personal data used includes |
|--|--|
| Where requested by you we will provide you with a quotation for any of our products and services | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Data about your energy equipment, usage and property details |
| To deliver our products and services to you | All personal information we collect as listed in Section 6 |
| To collect payments for products and services and manage your payment plans | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Financial & transaction information • Data about your energy equipment, usage and property details • Purchase and account history • Location information • Technical data |

| | |
|--|--|
| <p>To deliver service communications to you (such as bills and annual statements), and tailoring those communications to your circumstances</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Financial & transaction information • Data about your energy equipment, usage, generation and property details • Data about changes of circumstances • Vulnerability information |
| <p>To manage and answer your complaints or questions. This includes communication media such as email, telephone, live online chat and social media.</p> | <p>All the personal data which is necessary for us to deal with your enquiry, question or complaint, which will depend on the nature of your request and your contact preferences</p> |
| <p>Showing you information about your energy consumption</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your account information and details of other people linked to your account • Data about your energy equipment, usage and property details |
| <p>Providing industry flows and managing the forecasting and calculation of consumption data and validate invoices to ensure you are charged the right amount for your energy supply</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your account information and details of other people linked to your account • Data about your energy equipment, usage and property details |

To comply with our legal obligations (and for the establishment, exercise or defence of legal claims)

We process your personal data because we need to comply with a legal or regulatory obligation, including:

| Reason or purpose | Personal data used includes |
|---|--|
| To comply with our UK Government obligations such as Smart metering, Warm Home Discount, Green Deal and ECO | <ul style="list-style-type: none">Your contact details and the contact details of people associated with your accountAccount information and details of other people linked to your account |
| To comply with our Ofgem obligations and to ensure we are meeting our licensing obligations | All personal information we collect as listed in Section 6 |
| To meet our data protection obligations to verify your identity before we provide you with, or make amendments to information relating to your account, and to understand the information we hold about you. To manage our communications with you based on the TPS or MPS registers. | All personal information we collect as listed in Section 6 |
| Attending to and handling emergency situations (including gas leaks) | <ul style="list-style-type: none">Your contact details and the contact details of people associated with your accountAccount information and details of other people linked to your accountSensitive data (details from the PSR register)Data about your energy usage |
| To resolve any disputes relating to your service usage with us, or your previous supplier | All the personal data which is necessary for us to deal with the dispute, which will depend on the nature of the dispute |
| For the detection and prevention of crime, including any investigations into potential fraudulent activity, such as energy theft. These requests may be coming from the Police or other government bodies/agencies. Please note that we may restrict the amount of information passed to the police or other governmental agencies if we feel the request is unnecessary or the data being asked for is disproportionate | The personal data which is necessary for us or the agencies to investigate the issue, which will depend on the nature of the problem. At a minimum, this will include your name and contact information and information about your account and transaction history. |
| To offer a priority service for vulnerable members, such as those with specific health or medical conditions | <ul style="list-style-type: none">Your contact details and the contact details of people associated with your accountAccount information and details of other people linked to your accountSensitive data (details from the PSR register) |
| To secure and protect our data processing network and infrastructure | All personal information we collect as listed in Section 6 |
| Internal and statutory audits | All personal information we collect as listed in Section 6 |

Because it is in our legitimate interests as a business to use your information:

We'll use your personal information if we consider it necessary for our legitimate business interests, or the legitimate interests of a third party, so that we can operate as an efficient and effective business and a responsible renewable energy supplier. This is subject to ensuring that those interests are not outweighed by your own rights and interests in relation to the relevant personal data and to that end where we wish to use legitimate interest we will carry out legitimate interest impact assessment for each of these.

We process the following categories of your personal data because we have a legitimate interest to do so, including:

| Reason or purpose | Personal data used includes |
|---|--|
| <p>Maintain and improve our Tonik Energy products and services e.g. to optimise our business processes, for quality assurance purposes, to support efficient business operations and the management and training of our staff, to analyse performance of webpages and provide relevant content to you</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your account information and details of other people linked to your account • Financial & transaction information • Purchase and account history • Lifestyle and demographic insight information • How you use our online applications and websites • Location information • Data about your energy equipment, usage, generation and property details • Sensitive data (details from the PSR register) • Advertising and direct marketing preferences and responses • Technical data |
| <p>Identify, and let you know about Tonik Energy products and services that may interest you e.g. to understand geographical and regional demographics, tariff information and energy consumption to tailor offers and recommendations to member needs. This is only done to support our primary business objectives of the provision of renewable energy and/or reducing your energy bills</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your Account information and details of other people linked to your account • Financial & transaction information • Purchase and account history • Lifestyle and demographic insight information • Advertising and direct marketing preferences and responses • Technical data |
| <p>Develop new products and services e.g. new energy products and technology, new website or online functionality, or new tariffs</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Financial information • Purchase and account history • Data about your energy equipment, usage, generation and property details • Technical data |
| <p>Management information reporting. This includes the creation of aggregated and anonymised information for further use It is important to be clear that for the use of Management Information, personal data is not accessed in its raw format directly by management. Our MI team create aggregated data <u>which</u> forms the bulk of such reporting ensuring that the data is not granular enough to identify individuals</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Account information and details of other people linked to your account • Financial & transaction information • Data about your energy equipment, usage, generation and property details • Technical data |
| <p>For market research purposes, to help us continually improve our offering to our members</p> | <p>All personal information we collect as listed in Section 6</p> |

| | |
|--|---|
| <p>To assess the financial vulnerability of our members, so that we can ensure you are on the best plan for your individual circumstances</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Financial & transaction information • Sensitive data • Your account information and details of other people linked to your account • Sensitive information |
| <p>To provide you with advice, guidance and information on green energy solutions or tariffs that are appropriate to your circumstances</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your account information and details of other people linked to your account • Financial & transaction information • Purchase and account history • Lifestyle and demographic insight information • Data about your energy equipment, usage, generation and property details • Sensitive information • Advertising and direct marketing preferences and responses |
| <p>Direct Marketing. If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to by law. However, we will never send you direct marketing materials where you have opted out of receiving direct marketing communications</p> | <ul style="list-style-type: none"> • Your contact details and the contact details of people associated with your account • Your account information and details of other people linked to your account • How you use our online applications and websites • Advertising and direct marketing preferences and responses |
| <p>Protection of our staff</p> | <p>All personal information we collect as listed in Section 6</p> |
| <p>Staff training</p> | <p>All personal information we collect as listed in Section 6</p> |
| <p>For the establishment, exercise or defence of legal claims</p> | <p>All personal information we collect as listed in Section 6</p> |

Where we have your consent:

This means that you have given clear consent for us to process your personal data for a specific purpose.

You can change your mind! If you have previously given us consent to process your data for a specific purpose you can freely withdraw such consent at any time. You can do this by emailing us at hello@tonikenergy.com, or unsubscribing where appropriate.

If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights.

Please note, where you update your consent directly with us, this change may take up to 7 days to take effect.

| Reason or purpose | Personal data used includes |
|--|---|
| To receive more frequent readings from your smart meter | <ul style="list-style-type: none">• Your contact details and the contact details of people associated with your account• Account information and details of other people linked to your account• Data about your energy equipment, usage, generation and property details |
| Push notifications within our online applications (please note that revoking these permissions may require you to do this within your device e.g. disabling cookies) | <ul style="list-style-type: none">• Your contact details and the contact details of people associated with your account• Account information and details of other people linked to your account• Technical data |
| Direct Marketing To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences | <ul style="list-style-type: none">• Direct Marketing preferences |
| To place you on our Priority Service Register | <ul style="list-style-type: none">• Your contact details and the contact details of people associated with your account• Sensitive information |

Where we process your personal data so you cannot be identified any more

We may anonymise and aggregate any of the personal data we hold (so that you can no longer be identified by it).

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.

8. Sources we collect your data from

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by the energy industry. This means that we will collect personal data from several sources. These include:

| Source | Further information on what we collect |
|---|--|
| Directly from you | When you enquire about our services, become a Tonik customer, purchase products or services from us, submit information via our websites, provide us with meter readings, complete forms we provide to you, enter our competitions and promotions, make a complaint, exercise your statutory rights, contact us by phone, live chat email or communicate with us in any way such as via social media. |
| Your previous energy provider | We may collect information from your previous energy provider about meter readings, metering details, energy consumption and generation, PSR status and information regarding your transactions. |
| Industry registers and data flows | Industry registers and data flows provide us with details of your metering and energy consumption. This includes ECOES, Xoserve and the DCC. |
| Other people who are linked to your account | If someone pays your bill on your behalf, or you are set up to pay someone else's bill, we may obtain information about you from them. |
| Price Comparison Websites (PCW) | Your personal data will be passed onto us from price comparison websites and related third party sellers should you choose to interact with them to generate a quote, or open up an account with us. |
| Other companies' apps and products | They provide us with information if you connect them to our products or services. An example of this would be social media platforms. |
| Our website and other online or mobile applications | We collect information about how you use them and any smart devices you connect to them. |
| Smart devices such as smart meters, solar panels and other devices that we provide to you or that you connect to your account such as IoT devices | We collect information about how you use them, your energy consumption and the health of the equipment. |
| Other companies we work with | The companies provide us with information to help us deliver our products and services to you. These include: <ul style="list-style-type: none"> • Network operators and distributors: to connect your meter to the energy network. • Meter installation booking companies • Debt collection agencies • Service and metering engineers • Price comparison websites and other lead generation providers • Businesses providing, managing and monitoring our IT infrastructure |
| Credit, anti-fraud agencies and the Police | They provide us with information about your financial, transaction and credit history |
| Housing associations and developers, including local authorities and social housing providers | They provide us with tenants' information, to enable us to make contact about their energy supply |
| Third Party data and insight providers | They provide us with relevant information about you which we append to our existing records, to help us operate our business and deliver our services to you |
| The Government, Ombudsman Services, Regulators and Citizens Advice: | These governmental or quasi-governmental organisations provide information to us for various purposes, including in relation to complaints they have receive, to help us deliver services to you, verifying your eligibility for discount schemes |

| | |
|-------------------|---|
| | and to enable you to exercise your rights under various other laws and regulations. |
| Public registers | These registers, such as the Land Registry, provide us with information about your property |
| Private registers | These registers, such as Zoopla, provide us with information about your property |

9. Third parties who process your data

Energy providers must work with industry partners as an essential element of the supply network in the UK to enable us to maintain continuity of supply. We also use third parties to help us host our infrastructure and applications, communicate with members, power our emails etc as we believe they are the best in their field at what they do.

We pass your information to a very limited number of third parties for the following reasons:

- To deliver the services you have requested from us, which might include giving information to members of your family, household, or other people who have an interest in the property, for instance, landlords or letting agents
- To deliver services that we have a legal obligation to provide to you, to ensure your continuity of supply and to ensure your services are delivered as you expect
- For legal or regulatory purposes including the detection of crime and fraud prevention
- If we 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.

Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy.

Here are the details some of our key third-party service providers, and what data they collect or we share with them, where they store the data and the purpose for which they need it:

Industry & energy service provision

We collect or share your data with various categories of third-party agencies, such as meter operators who are responsible for maintaining your meter, meter asset providers who own your meter, data collectors who collect meter readings from your meter, data aggregators who need the data to ensure supply and demand is balanced as well as occasional other third-party suppliers without whom the network could not operate.

This is an essential element of the energy supply network in the UK to enable us to maintain continuity of supply.

| Service Provider | Data collected or shared | Purpose | Useful links |
|--|--|---|--------------------------------|
| ECOES (Electricity Central Online Enquire Service) | <ul style="list-style-type: none">• Contact details• Data about your account• Data that identifies you• Data on how you use Tonik services Data about your energy equipment and usage | ECOES is a market information system supporting the electricity customer transfer process in Great Britain | Privacy Policy |
| GDCC (Green Deal Central Charge Database) | <ul style="list-style-type: none">• Contact details• Data about your account• Data that identifies you• Data on how you use Tonik services• Data about your energy equipment and usage | The GDCC is a centralised market system that receives and processes industry-defined message flows from Retailers, DNOs, Energy Performance Certificate (EPC) registers, Green Deal Providers, Remittance Processors and the ECOES database | Privacy Policy |
| DCC (The Data Collection Company) | <ul style="list-style-type: none">• Contact details• Data about your account• Data that identifies you• Data about your energy equipment, usage, generation and property details• Transaction information• Dispatch appointment times | Management of smart meter communication | Privacy Policy |

| | | | |
|---|--|--|--------------------------------|
| Xoserve | <ul style="list-style-type: none"> Contact details Data about your account Data that identifies you Data on how you use Tonik services Data about your energy equipment and usage | Xoserve is the Central Data Service Provider for Britain's gas market. It enables the reliable, efficient operation of Britain's competitive retail gas market to serve all customers large and small. | |
| National Grid | <ul style="list-style-type: none"> Contact details Data about your account Data that identifies you Data on how you use Tonik services Data about your energy equipment and usage | To comply with rules and regulations set by Ofgem. National Grid is a network operator and distributor and our partner for the delivery of smart metering. | Privacy Policy |
| Other energy companies, network companies and industry bodies | <ul style="list-style-type: none"> Contact details Data about your account Data that identifies you Data on how you use Tonik services | To comply with rules and regulations set by Ofgem, as part of industry initiatives, the Theft Risk Assessment Service, or to help make it easier for you to switch suppliers in line with industry guidelines. | |
| Phoenix Works | <ul style="list-style-type: none"> Contact details Data about your account Data about your energy equipment, usage, generation and property details | Our partner for the provision of our solar and battery technology products | Privacy Policy |
| PWC | <ul style="list-style-type: none"> Data about your account How you use Tonik | To comply with financial audit regulations | Privacy Policy |
| New energy provider | <ul style="list-style-type: none"> Contact details Data about your account Data that identifies you | To enable you to switch to a new company that you have selected to provide you with gas or electricity. | |

The Government or our regulators

| Service Provider | Data collected or shared | Purpose | Useful links |
|--|---|---|--------------------------------|
| Office of Gas and Electricity Markets (Ofgem) | <ul style="list-style-type: none"> Your contact details and the contact details of people associated with your account Account information and details of other people linked to your account | To comply with rules and regulations set by Ofgem. | Privacy Policy |
| Financial Conduct Authority (FCA) | <ul style="list-style-type: none"> Financial & transaction information Anti-fraud information Vulnerability information Purchase and account history Records of our communication between you and our team at Tonik Energy Technical data | If you raise a dispute or complaint and are eligible for review by an ombudsman service, like the Energy Ombudsman Service, or we are required to notify them under our legal obligations e.g. breach notification to the ICO | Privacy Policy |
| Information Commissioner's Office (ICO) | | | Privacy Policy |
| Ombudsman services | | | Privacy Policy |
| BEIS (Department for Business, Energy & Industrial Strategy) | | | Privacy Notice |
| The Treasury | | | Privacy Notice |

Financial services including payment partners, debt collection, credit checking & fraud

| Service Provider | Data collected or shared | Purpose | Useful links |
|------------------|---|-----------------------------------|--------------------------------|
| GoCardless | <ul style="list-style-type: none">Contact detailsData about your accountFinancial informationFinancial & transaction information | Secure payment collection | Privacy Policy |
| Paypoint | <ul style="list-style-type: none">Contact detailsData about your accountFinancial & transaction information | Payment collection | Privacy Policy |
| Experian | All the personal data which is necessary for us to deal with the dispute, which will depend on the nature of the investigation | Fraud detection and investigation | Privacy Policy |

Infrastructure

Key companies that help us run our business and support our IT & Technology infrastructure

| Service Provider | Data collected or shared | Purpose | Useful links |
|---------------------|--|--|--------------------------------|
| Microsoft Azure | All personal information we collect as listed in Section 6 | The platform on which we build, manage and deploy online applications | Privacy Policy |
| Microsoft Office365 | All personal information we collect as listed in Section 6 | The provision of our office applications for document creation, management and email communication | Privacy Policy |

Analytics

| Service Provider | Data collected or shared | Purpose | Useful link |
|------------------|--|---|--------------------------------|
| Google Analytics | <ul style="list-style-type: none">Contact detailsHow you use TonikVarious other personal data as set out in their privacy policyCookies | Google Analytics is a web analytics service: we use it to track your use of our online services, prepare reports on user activity and help us ensure our content is accessible on different platforms and devices | Privacy policy |

Integrations (by your request) & social media

| Service Provider | Data collected or shared | Purpose | Useful links |
|------------------|--|---|--------------------------------|
| Google | <ul style="list-style-type: none">Contact detailsHow you use TonikVarious other personal data as set out in their privacy policyCookies | This enables users to authenticate via Google and connect with Google services such as location mapping | Privacy policy |
| Facebook | <ul style="list-style-type: none">Contact detailsHow you use TonikVarious other personal data as set out in their privacy policyCookies | This enables users to authenticate via Facebook and interact with us via Facebook pages or messaging | Privacy Policy |

| | | | |
|-------------|---|---|--------------------------------|
| Trust Pilot | <ul style="list-style-type: none"> • Contact details | This enables you to provide a review of our services | Privacy Policy |
| Twitter | <ul style="list-style-type: none"> • Contact details | This enables users to interact with us via the Twitter platform | Privacy policy |

Communications

| Service Provider | Data collected or shared | Purpose | Useful links |
|------------------|--|---|--------------------------------|
| Foehn | <ul style="list-style-type: none"> • Contact details • Our communication with you • How you use Tonik | For the provision of our phone and online chat facilities | Privacy Policy |
| Mailchimp | <ul style="list-style-type: none"> • Email address • How you use Tonik • Data that identifies you • Technical data • Our communication with you | For sending, storing and tracking emails | Privacy Policy |
| UKMail | <ul style="list-style-type: none"> • Contact details • Our communication with you | For sending postal mail | Privacy Policy |
| RSVP | <ul style="list-style-type: none"> • Contact details • Our communication with you • How you use Tonik • Financial information. | For the provision of outgoing calls to our members and handling calls for taking payments over the phone. | Privacy Policy |

10. How we use cookies

We use cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies are anonymous, so they don't store any personal information of any kind.

Unless you adjust your browser settings to refuse cookies, we (and our third parties) will issue cookies when you use our website to distinguish you from other users of our website. These may be 'session' cookies, meaning they delete themselves when you leave Tonik Energy websites, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide you with a tailored service. This helps us to provide you with a brilliant experience when you browse our site and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

Necessary cookies — we need these for our site to operate. These cookies, for example, enable you to obtain a quote or to log into secure areas of our site.

Performance cookies — these help us to improve the way our site works by analysing how people move about our site enabling us to help you to find things more easily.

Functionality cookies — let us greet you by name and provide you with a more personalised service.

Targeting cookies — record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please note that where third parties use cookies we have no control over how those third parties use those cookies, and you should check their cookie policies for further details.




How can I block cookies?

If you don't want us to use cookies in your web browser, you can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can also delete cookies through your browser settings.




However, please remember that some parts of our website require cookies to function properly and if you use your browser settings to disable, reject, or block cookies (including essential cookies), you may not be able to access all or parts of our website. More information about cookies including what they are and how to block or delete them can be found at www.aboutcookies.org

11. Your privacy choices and rights

Your Choices

| | |
|---|--|
|  | You can choose not to provide us with your personal data If you do choose to do this, you can continue to use the website and browse its pages or interact with us on social media but we will not be able to provide you with energy services or process transactions without personal data. |
|  | You can turn off cookies in your browser by changing its settings You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and browse its pages, but Tonik space and some other online services will not work effectively. |
|  | You can ask us not to use your data for marketing We will inform you (before collecting your data) if we intend to use your data for marketing and if any third parties are involved. You can opt out from marketing by managing your settings within your Tonik Space account or by contacting us: Telephone: 0333 3442686 Email: hello@tonikenergy.com or privacy@tonikenergy.com Post: Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT |

Your Rights

| | |
|---|--|
|  | You have the right to access information we hold about you This includes the right to ask us supplementary information about: <ul style="list-style-type: none">• the categories of data we're processing• the purposes of data processing• the third parties or categories of third parties to whom the data may be disclosed• how long the data will be stored (or the criteria used to determine that period)• your other rights regarding our use of your data We will provide you with the information within one month of your request, unless one of the following exemptions applies: <ul style="list-style-type: none">• Doing so would adversely affect the rights and freedoms of others (e.g. another person's confidentiality or intellectual property rights) or the law allows us to extend this period of time. We'll tell you if we can't meet your request for such reasons.• Some or all of the personal data is exempt from such requests in a particular circumstance. If this exemption applies, we will tell you this when responding to your request. <p>Should you wish to exercise this right, please contact us with a description of the information you would like to see. 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.</p> |
|  | You have the right to make us correct any inaccurate personal data about you You have the right to ensure that any information we hold about you is accurate and kept up to date. |
|  | You can object to us using your data for profiling you or making automated decisions about you We may use your data to determine whether we should let you know information that might be relevant to you (for example, tailoring emails to you based on your behaviour). Otherwise, the only circumstances in which we will do this is to provide Tonik Energy services to you. |

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



You have the right to export your data to another service

We will give you a copy of all the personal data applicable to this right in CSV or JSON format so that you can access it and / or provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.



You have the right to be 'forgotten' by us

You can do this by asking us to erase any personal data that we hold about you, if it is no longer necessary for us to hold that data for any of the purposes set out in this Privacy Policy that still apply to you relating to the provision of Tonik Energy products or services. The right to erase your personal data can be made 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



Restrict processing

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.



Object to processing

You have the right to object to processing which is based on:

- Legitimate interests
- Tasks carried out in the public interest
- Direct marketing



You have the right to lodge a complaint regarding our use of your data

We would ask that if you do wish to do this that you please tell us first so that we have a chance to address your concerns.

If we fail in this, you can address any complaint to the UK Information Commissioner's Office, either by calling their helpline or as directed on their website at www.ico.org.uk.

How to exercise your rights

You can contact Tonik Energy's data protection officer by writing to:

The Data Protection Officer
Tonik Energy, 145 Great Charles Street Queensway, Birmingham B3 3LT.

You can also contact our data protection officer via email at privacy@tonikenergy.com

12. How long do we store your data?

We will 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. This means that 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 for Business, Energy & Industrial Strategy.
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- 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 demonstrate compliance 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

13. Information Security

Tonik Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with. This includes robust security mechanisms, business continuity and resilience plans and ongoing testing of these measures.

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.

14. Making this Privacy Policy great

Well done for getting to the bottom of this Privacy Policy. We are conscious that there is a lot of information here and we will be working over the coming months to continue ensuring that this Privacy Policy is as clear and simple as possible.

We have designed it to be as transparent, useful and engaging as possible and we would love to hear your feedback on how we can make it even better.

This is a dynamic document that will change regularly so please don't make this the last time you read it as we will post any changes on this page - significant changes will, of course, be notified to you by email.

Most recent update: May 2018

Previous updates: