

## Privacy policy (Updated September 2018)

Calon Energy Limited ("Calon Energy") respects the privacy of the people we deal with and upholds high standards of privacy practice and security.

This policy explains how we handle personal information and how we interact with you online.

### Using your personal information

Calon Energy are considered to be the **data controller** of such personal data that is collected & obtained as we determine the purposes and means of processing that personal data. We are registered with the UK's Information Commissioners Office under registration number ZA301458.

Where this Policy refers to **processing** this includes collecting and storing personal data. This Policy explains how we use your personal data, our legal basis for such use and your rights in relation to our processing of your personal data.

We would encourage you to read this Policy thoroughly so you know how we use your personal data, who we share it with and so that you understand your rights. We are committed to processing your personal data fairly and in accordance with the requirements of data protection law.

Should you have any queries about our processing of your personal data please contact our Data Protection Officer at Calon Energy, Severn Power Station, West Nash Road, Nash, Newport, South Wales, NP18 2BZ

### Our group of companies & legal entities

Our products and services may be provided to you by different companies within our **Company Group**. In order to enable such products and services to be provided we may need to share your personal data within our Company Group. The following companies within our Company Group may have access to your personal data. Where the term Company Group is used within this Policy we are referring to this list of companies and Company Group is any one of the companies on this list. You can find out more about Calon Energy on our website at [www.calonenergy.com](http://www.calonenergy.com)

- **CALON ENERGY LIMITED**  
**09020390** - Incorporated on 1 May 2014  
Severn Power Station West Nash Road, Nash, Newport, Gwent, NP18 2BZ
- **CALON ENERGY (BAGLAN BAY) LIMITED**  
**08249830** - Incorporated on 11 October 2012  
Severn Power Station West Nash Road, Nash, Newport, Gwent, NP18 2BZ
- **CALON ENERGY (INVESTMENTS) LIMITED**  
**08296576** - Incorporated on 16 November 2012  
Severn Power Station West Nash Road, Nash, Newport, Gwent, NP18 2BZ
- **CALON ENERGY (SEVERN) LIMITED**  
**08786682** - Incorporated on 22 November 2013

Severn Power Station West Nash Road, Nash, Newport, Gwent, NP18 2BZ

- **CALON ENERGY (SUTTON BRIDGE) LIMITED**

**08296825** - Incorporated on 16 November 2012

Severn Power Station West Nash Road, Nash, Newport, Gwent, NP18 2BZ

- **SUTTON BRIDGE POWER FUND**

**03719085** - Incorporated on 19 February 1999

16 Axis Court Mallard Way, Swansea Vale, Swansea, SA7 0AJ

## **Data Collection**

Our Company Group may retain personal information which we receive when you contact us independently or in provision of a service to or from your company or as an individual.

We may collect the following types of information:

Your name, address, email address, telephone number(s) and other contact details

Your organisations name, your position in the organisation, the organisations address, email address and telephone number

We collect this information to respond to your independent query; in the execution of customer / supplier business operations; making payment for services procured or invoicing for services provided, and as required to meet our legal and regulatory obligations. Personally Identifiable Information may also be collected for the purposes of providing funding to community groups and during the course of recruitment if you apply for a vacancy with our Company Group.

We will only retain this personal information for as long as it is needed to carry out a particular purpose or meet a particular obligation.

Calon Energy does not sell directly to the public or keep a marketing database.

## **How we use your Data**

### ***Funding Applications***

Should you request a grant for funding through the Sutton Bridge Power Fund we will process your personal information under the legal basis of '**Performance of a Contract**' if your grant application is approved. Personal information which is processed during the application stage of the funding process will be managed with your **Consent** being provided. You can withdraw your **Consent** at any time during the application process which will terminate your funding request. Your data will be retained for a maximum of 6 years from the point of the application being approved. Where an application is not approved, your data will be retained for a maximum of 12 months.

### ***Job Applications***

In most cases, the Company Group will recruit through recruitment agencies who will pass on your details. For unsuccessful applicants personal information will be retained for a maximum of 6 months from receipt. Your **Consent** to provide your personal information will be obtained by the recruiting agent.

### ***An Employee, Contractor or Agent for the Company group***

Upon appointment with one of the company groups you will be provided with our internal data protection policy which explains more in terms of how we process your personal information. If you require any further information on this prior to an appointment with the Company group, please contact the recruiting manager.

### ***Website interaction and communication by phone, email or otherwise***

If you interact with us via our Website, or if you communicate with us by phone, email or otherwise, then we will collect your name, contact details, and any other personal information that you provide to us.

We will only use this personal information for the purpose of providing you with any information you request from us, or to deal with your enquiry. If you have provided any feedback to us, then we may use this feedback to improve our Website and/or the services we provide.

It is in our **Legitimate Interests** to process your personal information in this way, as it is necessary to respond to your request or enquiry and to help improve our Website and our services, and these interests are not overridden by any detriment to your rights or freedoms. Your personal information will be retained for no longer than is justifiably necessary, depending on the nature of the enquiry or interaction.

We will also keep a record of our correspondence.

### ***Visitors to our websites***

Our website [www.calonenergy.com](http://www.calonenergy.com) is hosted by Calon Energy Limited which takes a proactive approach to user privacy and ensures the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with the GDPR and all UK national laws and requirements for user privacy.

When someone visits [www.calonenergy.com](http://www.calonenergy.com) we use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. This software will save a cookie to your computer's hard drive to monitor your engagement and usage of the website but will not store, save or collect personal information. If at any time in the future we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### ***Use of Cookies***

You can read more about how we use cookies and how you can change your cookie settings on our [Cookies Page](#). When visiting our website for the first time you will be asked to **Consent** to us using cookie data, this request will be prompted every 30 days after your first visit.

### ***Website Security and Performance***

The security and performance of our website is maintained by a third party. Our website uses active security mechanisms to protect the integrity and availability of the website and its data, collecting and storing statistics such as the IP address, pages visited, entry and exit points, browser agent types and frequency of pages accessed. This non-personally-identifiable data is used by the company to identify and block any access that is deemed to pose a risk to the website or its data.

### **Links to other websites**

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **People who contact us via Social Media**

Calon Energy Limited has a linked in page <https://www.linkedin.com/company/calon-energy-limited>.

We manage our social media interactions ourselves.

If you send us a private or direct message via social media the message will be stored by ourselves for 12 months. It will not be shared with any other organisation.

### **People who email us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### **Use of CCTV**

A closed-circuit television (CCTV) system is used at all sites owned by Calon Energy. This system has been registered with the Information Commissioners Office (ICO) under the terms of the Data Protection Act 2018 and associated policy is maintained and reviewed to comply with the requirements of the General Data Protection Regulation (GDPR).

CCTV is used for maintaining the security of property and premises and for preventing and investigating crime, and for monitoring operations.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about staff, customers and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, security organisations and persons making an enquiry.

CCTV recordings are retained for a maximum of 30 days before being permanently deleted. Where one of our CCTV's are located, a privacy notice will be displayed in a prominent location. Our legal basis for processing CCTV data is under **Consent** and **Legitimate Interests**.

### **People who make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. Personal Information is obtained for the purpose of managing the complaint under the legal basis of a **Legal Obligation** to comply with the Consumer Complaints Handling Standards regulation 2008.

### **Your legal rights explained**

- **The right to be informed about our processing** - the information in this Policy is intended to inform you about the processing we carry out together with "just in time" notices when we collect additional information at different points during your relationship with us
- **The right to have personal data corrected if it is inaccurate or incomplete** – you can ask us to change or complete any inaccurate or incomplete or incorrect personal data that we hold about you
- **The right to withdraw Consent** – if you have given us **Consent** to process your personal data you have the right to withdraw that **Consent** at any time by contacting us
- **The right to object to processing based on it being in our Legitimate Interests** – where we rely on the **Legitimate Interests** legal basis to process your personal data you have the right to object to us using your personal data for those purposes. We do not have to stop processing your personal data if we can show that it is in our overriding interests to carry on processing your personal data and it will not cause you unjustified harm.
- **The right to restrict processing** - you can ask us to restrict the personal data we use about you where you have asked for it to be erased or you have objected to our use of it
- **The right to have personal data erased** – you have the right to have personal data deleted where it is no longer necessary for us to use it, you have withdrawn **Consent** or we have no lawful basis to keep it
- **The right to request access to your personal data and information about how we process it** - this is known as a subject access request and can be made in writing, by email or by phone. We will not charge a fee unless your request is manifestly unfounded or excessive (particularly if it is repetitive) when we may charge you a reasonable fee based on our administrative costs
- **The right to move, copy or transfer personal data** – you can ask us to provide you or a third party with some of the personal data we hold about you in a structured, commonly used electronic form so it can be easily transferred
- **Rights in relation to automated decision making and profiling** – we don't usually perform any automated decision making or profiling based on personal data that has been provided. There are some rare occasions when we may do so during the recruitment process for some senior roles. You will always be notified prior to any data processing where there may be an automated decision made or where your data is used to profile

Should you wish to exercise any of your legal rights, please make contact with our Data Protection Officer by contacting [data.protection@calonenergy.com](mailto:data.protection@calonenergy.com)

You also have the right to raise a complaint with the Information Commissioner's Office if you have concerns about how we process your personal data.

