

# Privacy Policy

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Shell Energy Retail Limited in the UK is wholly owned and fully operated by Octopus Energy Limited. As of 1 December 2023, Shell Energy Retail Limited is no longer a part of the Shell Group of Companies.

Shell Energy is committed to ensuring the privacy and security of your personal data.

This Privacy Policy explains **what** personal data are processed about you, **why** we are processing your personal data and for which purposes, **how long** we hold your personal data for, **how to access and update** your personal data, as well as the options you have regarding your personal data and **where to go for further information**.

In this Privacy Policy, when we refer to "personal data", we mean information which could directly identify you (for example, your name or national insurance number) and information which could indirectly identify you, meaning that it could identify you when combined with other information which we hold about you (for example, your gender or date of birth). "Process" or "processing" means just about any conceivable use of personal data, including recording, storing, viewing or disclosing personal data.

Shell Energy Retail Limited (company number 05070887) is the data controller of your personal data (referred to in this Policy as "Shell Energy" or "we").

If you have any questions about your personal data which are not answered by this Policy, please contact The Shell Energy Data Privacy Team:

By post: The Shell Energy Data Privacy Team, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN. By email: [dpo@shellenergy.co.uk](mailto:dpo@shellenergy.co.uk)

## What personal data do we process about you? Collection of information

### Information that you provide to us

We collect your personal data, details about other members of your household and details about authorised contacts to give you the best possible experience as a user of our products and services. In general, we collect information from you when you interact with us to request a broadband/ telephone or energy quote or availability check, open up an account, visit our website, make a purchase from our online shop, enter a competition, complete a survey or contact us with an enquiry or complaint. This covers all channels of communication with us, including over the telephone, email, live chat, website, via one of our apps, social media, SMS, post and in person.

We may collect the following information from you to provide you with a quote, set up and manage your account and to verify who we are dealing with if you contact us:

- Your name
- Name and contact details of individuals authorised to access your account
- Name and contact details of individuals who report a telephony fault on behalf of a customer, for the purpose of receiving engineer updates on any repair work required in order to support the customer
- Records of your interactions with us, such as call recordings to monitor, record, store and use for training purposes and to improve the service we provide.
- Contact address (which may include previous address history)
- Email address
- Telephone number

- Meter readings and consumption data (if you are an energy customer)
- Your date of birth
- Bank account or payment details (should you decide you would like to set up a direct debit with us)
- Telephone numbers that you call and receive calls/ messages from (if you are a broadband/ telephone customer)
- If you are a broadband customer we will collect data about your broadband usage
- Details about whether you are the homeowner, landlord or tenant to enable us to identify which products and services will be most suitable for you

To be sure that we're offering you the best option for your circumstances, we may request additional personal data to check whether you're eligible for certain tariffs or government discount schemes. This might include:

- Details of your household income
- Information about any health or medical conditions that you or members of your household may have
- Details of any benefits you receive

If you are an energy customer, and you or a member of your household is in a vulnerable situation, we may ask you for and/ or process the following information so we can tailor additional help and support appropriately (for example a bespoke debt pathway) or place you on our Priority Service Register:

- Details of your health or medical conditions
- If you choose to opt in to the Priority Service Register due to having a child/children in the household under 6 years of age, we will request the date of birth for the youngest child. Once this child turns 6 years of age their date of birth will be removed from our systems
- Any other information that you provide us with as part of your application
- This information will be shared with Network Operators for example energy distributors and transporters (who may then share that information with water companies in line with agreed industry processes), to enable them to prioritise your property's supply should any issues occur, for example a loss of power or water supply

If you are a broadband or telephone customer, and you or a member of your household, is in a vulnerable situation, we may ask you for and/ or process the following information so we can tailor additional help and support appropriately (for example priority fault repair or a bespoke debt pathway):

- Details of your vulnerability or disability
- This information may be shared with Network Operators to prioritise a fault repair

Should your circumstances change, we may also ask for the following to allow us to service your account:

- Your new address or a copy of your tenancy agreement, should you move home
- Documentation to support a change of name request, such as a marriage certificate, decree absolute or deed poll
- Documentation to help us close or transfer an account in the case of a bereavement, such as death certificates, solicitors' correspondence, wills or probate documents

We will also obtain or request the following information if you contact us with an enquiry or complaint:

- Any information that you disclose to us as part of your enquiry or complaint
- Necessary information to resolve your complaint, which could include:
  - Bills from your previous supplier
  - Legal documentation
  - Tenancy agreements
  - Copies of cheques or bank statements

When you make an online purchase via our shop and check out as a guest, we will collect transaction-based data to enable us to process your order.

If you enter one of our surveys or competitions, we will collect the following:

- Your contact details
- Any information that you disclose to us in your responses

#### Broadband and Telephone Email/ Voicemail services

- If you use email services as part of a legacy broadband product we may process any content that you write or receive in an email including but not limited to pictures, attachments and photos. We have no control over the content and sensitivity of the data in your email communications, or when or where your content is sent or received. We will only process this data for the purpose of providing you with these services (sending, receiving and storing emails) and we do not use this data for our own purposes.
- If you use the Voicemail service, by setting up your voicemail box and accessing your voicemail, then Shell Energy will only process your recorded message and any voice messages you receive, to provide this voicemail service. We do not use this data for our own purposes. You can choose to delete voicemail recordings at any time or remove the voicemail from your service.
- We retain email and voicemail content for as long as you want us to retain it on your behalf, or in accordance with any Terms and Conditions. When you delete your emails and voice messages, we also delete all the places they are stored.
- If you download Anti-virus software from our 'Secure Online Service' we will process your customer reference number, and a licence key code.

If you choose to take part in Smart Flex, Shell Energy will use your Meter Point Administration Number (MPAN) and half-hourly consumption data to work out your energy reduction. We'll use your contact details for the purpose of registering you for Smart Flex, and to email you updates regarding your participation and entry into the prize draws.

#### Information that we obtain through your use of Shell Energy services

If you visit our website [www.shellenergy.co.uk](http://www.shellenergy.co.uk):

- Your device and browser may disclose certain information (such as device type, operating system, browser type, IP address, MAC number, dates and times our website was accessed and other information) that may be personal data.

#### Cookies and similar technologies

Shell Energy uses cookies and similar technologies that collect and store information when you visit a Shell Energy Website or use a Shell Energy App. This is to enable Shell Energy to identify your internet browser and collect data on your use of our website, which pages you visit, the duration of your visits and identify these when you return so that we improve your experience when visiting our website(s). You can control and manage your cookies preferences by adjusting your browser settings or using the Shell Energy cookies preference tool on Shell Energy's Website – for more information, please refer to the Shell Energy Cookie

Policy at [www.shellenergy.co.uk/info/policies/cookies](http://www.shellenergy.co.uk/info/policies/cookies)

## Information gathered through external sources

Price comparison websites and third party sellers:

- Your personal data will be passed onto us from price comparison websites and third party sellers should you choose to interact with them to generate a quote, or open up an account with us.

Credit reference agencies (CRAs):

- When you open up an account with us, your credit score will be provided to us by CRAs.
- We will receive information from CRAs about your creditworthiness.
- For more information about the data we share about you and receive from CRAs please see the section below 'Credit Reference Agencies (CRAs)'.

Smart meters:

- If you have a smart meter installed at your property, we'll automatically receive readings in relation to your energy consumption. This will allow us to provide you with a number of benefits including accurate bills, and the ability to keep track of the energy you use.
- For more information on your smart meter, please visit our website at [www.shellenergy.co.uk/smart-meters](http://www.shellenergy.co.uk/smart-meters)

Energy organisations:

- If you're an energy customer, we'll receive information from industry organisations for example meter readers, meter equipment owners/ fitters and other energy suppliers. We will also receive data from energy distributors and transporters who operate national databases for the gas and electricity markets which will include information such as unique identifiers linked to your meter and the address of the registered property.
- Energy distributors and transporters may also make us aware that you are eligible to be added to the Priority Services Register and share information you have provided to them (or to water companies in line with industry processes) such as information relating to health issues.

Broadband and telecommunications infrastructure providers:

- If you're a broadband or telephone customer, we will also receive information on your usage from our broadband and telecommunications infrastructure providers. This could include your IP address and unique identifiers associated with your router.

Debt collection agencies:

- If you have an outstanding debt with us, additional personal data may be provided to us by debt collection agencies. This could include updated contact details such as your new address.

Tenants, landlords and letting agencies:

- If you move into a property that is on supply with us, your details may be provided to us by the previous tenant, your landlord or your letting agency. This could include your name, property address, email address and contact telephone number. If you move out of a property that is on supply with us, and you have an outstanding debit or credit balance, we may receive your forwarding address or contact telephone number from your landlord or the new tenant.

#### Publicly available sources:

- We may use publicly available sources such as the electoral register, Land Registry, phone directories or Companies House to verify the information we hold about you or, for example, to trace you if you have moved without paying your bill or to return a credit to you.

#### Department for Work and Pensions (DWP):

- If you apply for a government scheme, for example the Warm Home Discount Scheme, we may obtain confirmation from DWP that you are in receipt of the benefits that enable you to qualify for that scheme.

#### Supplier of Last Resort

- If your energy supplier has ceased trading and Ofgem appoints us to take over your supply, we will receive information from Ofgem and other industry organisations to enable us to register your supply, which may include: your name and contact details, your bank details, information about your meter and meter readings and if you are registered as a Priority Service customer we will also receive details about the category of priority service you require, which may include details relating to your health.

#### Other companies with an appropriate lawful basis for sharing your personal data:

- Where you have told another company you are happy to hear about our products and services i.e. if you consent to receive marketing from Shell Energy when completing a third party survey online.
- Where you have given your consent to another company to provide information relating to your personal finances to enable us to offer you a tailored debt pathway.
- To enable us to check any information which may be missing from your account i.e. your date of birth to enable us to identify you if you contact us.

#### Screening:

- In addition, in order to comply with legal and regulatory obligations, to protect Shell Energy's assets and employees/contractors and specifically to ensure that Shell Energy can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we may carry out screening (pre-contract and on a periodic basis post-contract) on owners, shareholders and directors of our Business Customers, Suppliers and Business Partners. This screening takes place against publicly available or government issued sanctions lists and media sources.

The screening does not involve profiling or automated decision-making in relation to the counter-parties or potential counter-parties.

## For what purposes do we process your personal data?

We'll use your personal data for the purposes outlined below:

#### To fulfil our contractual agreement to provide you with our products and services:

- Where requested by you, to provide you with a quotation for any of our products and services
- To deliver our products and services to you according to our contractual agreement
- To manage the forecasting and calculation of consumption data and to validate invoices
- To collect customer payments and manage payment plans
- To contact you with important information about your account, including bills and statements.

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

- To comply with our regulatory requirements, for example those under Ofgem such as Warm Home Discount, Green Deal and ECO, and our obligations under Ofcom
- To meet our data protection obligations to verify your identity, before we provide you with information relating to your account
- To resolve any disputes relating to your service usage with us, or your previous supplier
- For the detection and prevention of crime, including any investigations into potential fraudulent activity, such as energy theft
- To ensure that your contact details are correct, so that we are able to comply with our requirements to update the Emergency Services database
- To respond to requests for information from the police and government bodies, to support in criminal investigations
- To offer a priority service for vulnerable customers, such as those with specific health or medical conditions
- To comply with legal and regulatory obligations including trade control, health and safety, anti-money laundering and/or bribery and corruption laws
- To defend against litigation or legal claims

Where we have legitimate business interests:

- To respond to customer enquiries and complaints
- To manage payment schedules, credit levels and debt collection
- To understand customer behaviour using modelling, analysis and profiling, so that we can provide you with products and services that are best suited to your requirements
- For management information (MI) reporting purposes including the use of analytics to help us continually improve our offering and operations to our customers
- To assess the financial vulnerability of our customers, so that we can ensure you are on the best plan for your individual circumstances
- Subject to your marketing preferences, to provide you with information about products and services that we think you'd benefit from, by post, telephone or by electronic means (where permitted by local law)
- To contact you with service messages that will support you and improve our service to you
- To provide you with insights about your energy usage, based on your consumption data
- To provide you with Priority Services (see Substantial Public Interest below)

Where we have your consent:

- To record details of any vulnerabilities and disabilities, in order to provide you with the services you have requested to support you, for example, to place you on our Priority Service Register if you are an energy customer
- To provide you with information about products and services that we think you'd benefit from in accordance with your marketing preferences
- To obtain half-hourly meter readings from your Smart meter

Vital interests:

If we are concerned about you or someone else's well-being or safety and/or there is a threat to life, we may share your data with the emergency services.

Substantial Public Interests:



- In the event that your energy supplier ceases trading and Ofgem appoints us to take over your supply or we buy another business, and you are registered as a Priority Service customer, we will also receive details about the category of priority service you require which may include details relating to your health and the special services you receive.

## Communication and marketing - your choices:

Subject to your marketing preferences, or where you have otherwise expressly consented, you may receive offers that are tailored towards your preferences based on the information gathered about you, from the various sources described above, in order to provide you with better products and increasingly tailored services. This could include updates about more cost effective plans that we have identified for you based on your usage.

We'll never sell your data to third parties for marketing purposes. Subject to your marketing preferences, we may send you recommendations about third party products and services that could be of interest to you.

This information could be sent to you via telephone, email, SMS, post, push notification or via your online account.

You can update your marketing preferences at any time within your online account, or to opt out you can contact us by:

Telephone: 0330 094 5800 Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk) Post: Customer Services, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN

You can also opt out of email marketing by clicking the 'unsubscribe' link within any marketing emails we send to you and you can opt out of SMS marketing by following the instructions at the bottom of any marketing SMS. If you use our Shell Energy app and wish to update your push notification preferences, you can do this within the Shell Energy app.

## Profiling for marketing:

We'd like you to receive personalised insights and offers about products and services that are most relevant to you, at the right time. In order to do this effectively, subject to your marketing preferences we will analyse your personal data to create a profile of you for marketing.

Your profile will be used to send you personalised communications we feel you'd benefit from, based on a variety of factors such as:

- General postcode and demographic data from publicly available sources
- Information you have provided to us directly
- Your current and historic meter usage
- The impact of variables such as the time of day/weather on your energy usage
- Your previous supplier
- The stage of your tariff you are currently at
- The channels you use to interact with us
- Your eligibility for government schemes (such as the Warm Home Discount)
- Any other products and services you have purchased from us
- Customer insight information from external data sources such as credit reference agencies like Experian



- The products and services you've bought from us previously

You can opt out of profiling for marketing at any time by opting out of all marketing. You can contact us by:

Telephone: 0330 094 5800 Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk) Post: Customer Services, Shell Energy, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN.

### Credit Reference Agencies (CRAs):

We'll perform automated processing in the form of a credit check before we open up an account for you. We use credit reference agencies to confirm the following:

- That you live at the property you'd like Shell Energy to supply.
- Your credit score. This is calculated by credit reference agencies based on information including (but not limited to) your financial accounts, credit applications and insolvency related events.

Shell Energy will calculate your credit score, to determine your creditworthiness and ability to afford future payments, and the range of products and services on offer to you.

If you are applying as an energy customer and fail to pass our credit check requirements, you may be asked to pay for a security deposit or to have a Prepayment meter installed.

If you are applying for our broadband or telephone services and fail to pass our credit check requirements, we may decline your application.

For more information about your rights in relation to decisions which are made based on automated processing, please see the '**Your rights in relation to your personal data**' section of this Privacy Policy.

Shell Energy will continue to provide payment performance data to the credit reference agencies on a monthly basis, which may impact your credit file, and applications for any credit agreements. This will include sharing your personal data with the CRA, including information about your application, your financial history and your financial situation, for example if you owe us money and do not repay on time and in full. The information that we share with CRAs can contribute to the overall credit file that they hold about you.

We may use the information that CRAs provide to us, alongside the information we already hold about you, for the following activities:

- To assess your ability to pay and which payment options Shell Energy will offer to you
- To trace and recover outstanding debts
- To prevent criminal activity such as money laundering and fraud
- To check the accuracy of the data we hold about you
- To update your account details with data which may help us to improve the security of your account such as your date of birth
- To ensure that we provide appropriate offers suitable to your personal circumstances

For more information regarding how your personal data is processed by credit reference agencies and how your credit score is calculated, please visit Experian at <http://www.experian.co.uk/crain/index.html> TransUnion at [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain) and Equifax at <https://www.equifax.co.uk/crain/>

## Who will we share your personal data with?

### Homeserve

Should you choose to sign up for one of the Boiler products on our website, you will be transferred directly to the Homeserve website where they will collect your details from you to set up your Homeserve account.

Homeserve will provide us with information about the products and services you have selected to help us improve our offering to our customers.

For more information about how Homeserve will process your personal data, please visit their privacy policy at <https://www.homeserve.com/uk/about/privacy-policy>

### Data sharing within our Group of companies

Your personal data may also be shared with any company that is a member of our group of companies, which may include our parent company **Octopus Energy Limited**, where necessary for internal administrative purposes, corporate strategy, auditing and monitoring and research and development. [Shell Go+](#)

Should you choose to sign up to the Shell Go+ loyalty programme, your email address will be shared with Shell Go+ to enable us to verify whether you are already an existing member. Should your eligibility to receive rewards change, this information will be communicated to Shell Go+. Your personal data will also be used for administrative purposes to aid us in providing you with these rewards.

For more information about how Shell Go+ will process your personal data, please visit their privacy policy at <https://www.shell.co.uk/privacy/b2c-notice.html>

### Other Third Parties

Your personal data may also be shared with the following categories of third parties:

- Broadband, telecommunications, energy and home services infrastructure and software providers, so that we can provide you with access to our products and services
- Installation service providers, to enable us to send out engineers to your property
- Warehouse storage and fulfilment centres, so that we can fulfil orders and send our products to you
- Fraud protection and prevention services, such as the TRAS fraud prevention agency, to help us to identify any potential fraudulent activity and for the prevention and detection of money laundering
- Outsourced contact centres, who assist us in our customer service operations
- Debt collection agencies, including debt collection agency staff who may visit your property, and other organisations assisting us with debt recovery (for example, courts and our solicitors)
- Credit reference agencies, to enable us to assess your creditworthiness
- Payment providers, to enable you to make payments online, by telephone and face to face, for our products and services
- Printing and distribution services, so that we can send out mailings to you
- Industry regulators (e.g. Ofgem, Ofcom and Department for Energy Security and Net Zero), legal and tax services, to help us comply with our legal and regulatory obligations and to improve our

services/operations

- Distribution Network Operators and Gas Transporters to provide your contact details for use in the event of a loss of supply or any information to support an investigation
- Electricity and Gas operations providers for example meter readers, meter equipment owners/ fitters
- Other energy suppliers
- Dispute and complaints services, should we need to resolve a complaint with you
- IT service providers, to enable us to manage and host our IT platforms
- Third party telesales companies and sales agents, who may contact you on our behalf with offers of our products and services
- Social media platforms and contact management tools, to enable us to respond to any communications with you via our social media and digital channels and provide you with advertising about our products and services which we think may benefit you
- Marketing and advertising agencies, to help us develop our marketing communications so that they are relevant for you
- Survey hosting providers, to enable us to send out surveys to you so that we can learn from your feedback and improve our customer service
- Voucher and gift fulfilment companies, should you be entitled to receive an incentive from us
- Referral marketing platforms, should you choose to participate in our Refer a Friend scheme
- Independent organisations and charities, such as Citizens Advice, should you choose to raise a complaint through these channels or request a referral
- Telephone directories, if you inform us that you wish to be listed in a directory
- Landlords, letting agencies and property managers, to communicate outstanding balances on your account
- Outsource partners and management consultants to help us improve the service we offer to you
- Government funded Innovation Consortia to enable you to participate in energy market trials
- If you nominate a third party to make a payment arrangement on your behalf, we will share information regarding your payments. In instances where Fuel Direct is chosen as a preferred payment method we may share information with the DWP such as employment status, National insurance number and any vulnerabilities identified in order to facilitate your request
- If you apply to join a government scheme, for example the Warm Home Discount Scheme, or you want to apply for Essentials Broadband, we may share your name, address and date of birth with the DWP to confirm :
  - i. that you are in receipt of the benefits that enable you to qualify for the government scheme
  - ii. that you are in receipt of the benefits that allow you to be eligible for Essentials Broadband-
- If you choose to take part in Smart Flex, Shell Energy will share your Meter Point Administration Number (MPAN) and half-hourly consumption data with National Grid.

We will also disclose your personal data to third parties:

- a. Where it is in our legitimate interests to do so to run, grow and develop our business:
  - i. if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - ii. if Shell Energy or substantially all of its assets are acquired by a third party, in which case personal data held by Shell Energy will be one of the transferred assets.
- b. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- c. To enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third

party, to protect the safety of any person or to prevent any illegal activity.

- d. To protect the rights, property or safety of Shell Energy, our employees, customers, suppliers or other persons.

Any third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

Save as expressly detailed above, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your personal data in a particular way, but later change your mind, you should contact us and we will stop doing so. You can do so by:

Telephone: 0330 094 5800 Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk) Post: Customer Services, Shell Energy, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN.

## Transfers of your personal data to other countries

Where your personal data have been transferred to companies within the Shell Energy group and/or to authorised third parties located outside of your country (including outside of the European Economic Area) we take organisational, contractual and legal measures to ensure that your personal data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented to safeguard your personal data. These measures include European Commission approved transfer mechanisms for transfers to third parties in countries which have not been deemed to provide an adequate level of data protection as well as any additional local legal requirements. For more information, please contact us by:

Telephone: 0330 094 5800 Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk) Post: Customer Services, Shell Energy, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN.

## Security

Shell Energy have implemented appropriate technical and organisational measures to protect the confidentiality of the personal data that you entrust us with against unauthorised, accidental or unlawful access, loss, alteration and disclosure. 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.

## Interacting with Shell Energy through social media

If you choose to interact with us through social media on a Shell Energy administered social media page such as Facebook, Instagram, Twitter or LinkedIn, your personal data (such as your name, your profile picture and the fact that you are interested in Shell Energy) will be visible to all visitors of your personal webpage depending on your privacy settings on the relevant social media platform, and will also be visible to us.

You can delete any information that you share on these sites at any time through your relevant social media platform's account. We do not track your activity across the different social media sites that you use. Please

contact us if you wish to make a request that you are unable to action yourself and which relates to a Shell Energy Social Media Page. For further information please see the section **'Your rights in relation to your personal data'**.

Additionally and to the extent Shell Energy is jointly responsible with a social media platform of a Shell Energy Social Media Page, we will have access through the social media platform to aggregated data providing statistics and insights that help to understand the types of actions you take on Shell Energy Social Media Pages. For more information on how your personal data is processed on those social media platforms, including any targeted advertising that you may receive, please refer to your privacy settings accessible through your relevant social media platform's account.

### How long do we hold your personal data for?

We'll 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. 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 Energy Security and Net Zero.
- To comply with the statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).
- To comply with the retention periods set by the TRAS Fraud Prevention Agency.
- 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 comply 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.

### Your rights in relation to your personal data

The following section sets out your rights in relation to your personal data.

If you would like to exercise any of your data subject rights, please contact us by:

Telephone: 0330 094 5800 Email: [customer.service@shellenergy.co.uk](mailto:customer.service@shellenergy.co.uk) Post: Customer Services, Shell Energy, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN.

We aim to keep our information as accurate as possible. You can request:

- access to your personal data;
- correction or deletion of the personal data (but only where it is no longer required for a legitimate business purpose such as continuing to supply your household with energy);
- that you no longer receive marketing communications;
- that the processing of your personal data is restricted; and/or that you receive personal data that you have provided to Shell Energy in a structured, digital form to be transmitted to another party, if this is technically feasible.

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

## Who can you contact if you have a query, concern or complaint about your personal data?

If you have any issues, queries or complaints regarding the processing of your personal data please contact us:

By post: The Shell Energy Data Privacy Team, UK House 5th Floor, 164-182 Oxford Street, London, England, W1D 1NN. By email: [dpo@shellenergy.co.uk](mailto:dpo@shellenergy.co.uk)

If you are unsatisfied with the handling of your personal data by Shell Energy, then you have the right to lodge a complaint to your local data protection authority The Information Commissioner's Office (ICO) whose address is Wycliffe House, Water Ln, Wilmslow SK9 5AF, Great Britain <https://ico.org.uk/>

## Changes to the Privacy Policy

This Privacy Policy does not form part of any customer's contract with us and we may amend it from time to time. In the event of any conflict between the Shell Energy Privacy Policy and your Terms and Conditions, regarding the processing of your personal data, the Shell Energy Privacy Policy will prevail.

Any changes we make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by email.

This Privacy Policy was last updated in January 2024.