

# **Data Protection Policy**

THREE60 Energy Limited is fully committed to compliance with the requirements of the Data Protection Act 2018 and all other data protection legislation currently in force. The Act and applicable Regulations apply to anyone processing personal data and sets out principles which should be followed and gives rights to those whose data is being processed.

To this end, the Company endorses fully and adheres to the Data Protection Principles.

These rights must be observed at all times when processing or using personal information. Therefore, through appropriate management and strict application of criteria and controls, the Company will:

- observe fully the conditions regarding having a lawful basis to process personal information.
- meet its legal obligations to specify the purposes for which information is used.
- collect and process appropriate information only to the extent that it is necessary to fulfil operational needs or to comply with any legal requirements.
- ensure the information held is accurate and up to date.
- ensure that the information is held for no longer than is necessary.
- ensure that the rights of people about whom information is held can be fully exercised under the Data Protection Act 2018 (i.e., the right to be informed that processing is being undertaken, to access personal information on request; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information).
- take appropriate technical and organisational security measures to safeguard personal information.
- ensure that personal information is not transferred outside the EU, to other countries or international organisations without an adequate level of protection.

## Visitors to our Website

Like most websites we use 'cookies' to improve your experience on our website and for functionality purposes. Cookies mean that a website will remember you. Cookies are small text files that sites transfer to your computer, phone, or tablet.

The website uses a Cookie for Google Analytics. It does not capture or store personal information, but merely logs the user's IP address which is automatically recognised by the web server. This is used to record the number of visitors to our site and volumes of usage.

For more information about Google Analytics visit the Google Analytics website. If you do not wish to accept cookies on to your machine you can disable them by adjusting the settings on your browser.

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

# PEOPLE WHO REQUEST AND/OR USE OUR SERVICES (CLIENTS)

We have to hold the details of the people who have requested our services in order to provide them. However, we only use these details to provide the service which the person or company has requested and for other closely related purposes.

We store client and supplier details for business purposes whether for day-to-day email communications, within our accountancy packages for invoicing and within our customer relationship management system which we use for tracking and managing client projects and communication.

## What personal data we collect and how we use it

The type and quantity of information we collect and how we use it depends on why you are providing it.

## CLIENTS

If you request or use our services, we will usually collect:

- Your name
- Your contact details
- Your bank details should they be required for credit notes or rebate payments

We will mainly use your data to:

- Provide you with the services, products, or information you asked for
- Administer your services and manage service delivery
- Keep a record of your relationship with us
- Pay credit notes / rebate payments

## SUPPLIERS

If we use your services, we will usually collect:

- Your name
- Your contact details
- Your bank details

We will mainly use your data to:

- Communicate with you in relation to the purchase and delivery of products and services
- Administer and manage the receipt of products and services
- Keep a record of your relationship with us
- Make payments for goods or services supplied

### **Direct Marketing**

If you form part of our mailing list you may from time to time receive occasional information from us about our company, new services, and important industry news. We will only ever send you information which we feel is of genuine interest to you, however if you would prefer not to receive these updates, please just get in touch at any time info@three60energy.com to let us know and we will make sure your wishes are followed. You can unsubscribe and/or update your preferences at any time.

### How we keep your data safe and who has access to it

We ensure that there are appropriate technical controls in place to protect your personal details; for example, our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained personnel.

We'd like to reassure you that we have not and will not retain your information in an unauthorised way nor share, sell or pass on your details to any other 3rd party for the purposes of marketing. We will only ever share your data in other circumstances if we have your explicit and informed consent.

## How long will we hold your data

We will only hold your information for as long as is necessary to fulfil the purposes for which it was collected. From time to time we may ask you to update your details or re-subscribe to our contact list. If you choose to unsubscribe from our mailing list, we may keep a 'suppression list' which includes your details so that we know you have chosen to be removed from the list.

#### Your right to know what we know about you, make changes, or ask us to stop using your data

You have a right to ask us to stop processing your personal data. If it's not necessary for the purpose, you provided it to us for (e.g., providing a service or product) we will do so.

Contact us on 01224 460460 or email info@three60energy.com if you have any concerns. You have a right to ask for a copy of the information we hold about you. If you spot any mistakes, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to the Office Manager, THREE60 Energy, 5th Floor Annan House, 33-35 Palmerston Road, Aberdeen AB11 5QP.

We do not accept these requests by email to make sure we only send personal information to the right person.

## Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on our website or by contacting you directly.

This policy was last updated September 2023.

#### How to contact us

If you want to request information, raise a concern, or contact us about our privacy policy you can email us info@three60energy.com or write to:

# THREE60 Energy Ltd 5th Floor Annan House, 33-35 Palmerston Road, Aberdeen AB11 5QP.

Signed:

Date: 6th September 2023

Walter Thain Chief Executive Officer