



**Privacy Policy  
UCR Consultants Limited  
UCR Connect**

UCR Consultants Limited are committed to keeping your personal information safe and confidential. This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be used and kept secure when using our UCR Connect.

This notice applies to personal information we hold about individuals and other individuals, such as company directors, or contacts on business accounts, including sole traders and partners. It does not apply to information which we hold about companies and other legal organisations.

Please read this Privacy Policy carefully to understand our views and practices regarding your personal information and how we will treat it. When you provide your personal information to us, you are deemed to have read this Privacy Policy and to have accepted it.

We may update this privacy notice from time to time to ensure it is always up to date and accurate. Any changes we may make to our privacy notice will be posted on this page.

UCR Consultants Limited (company number 06971697) is the Data Controller in relation to the related Services and your personal information. Our registered address is 78 Loughborough Road, Quorn, Leicestershire, LE12 8DX.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

**UCR Consultants Limited**

Crescent House  
40 Regents Road  
Leicester  
LE1 6YJ

Alternatively, you can email us at [compliance@ucrconsultants.co.uk](mailto:compliance@ucrconsultants.co.uk) subjecting the email Privacy and including your customer reference number.

**1. Information we may collect**

1.1 We collect and process the following personal information about you when you use our UCR Connect, this also includes our Website, Portal and when you communicate with us:

- Contact Information: such as, your name (first and surname), date of birth, home or business address, telephone number, email address, people associated with your business, previous address history dwelling characteristics, and utility budgets.
- If we contact each other by telephone, we will keep a record of all inbound calls to and from our call centre.
- Website/ Portal Log-in Credentials: such as, your username and password.
- IoT Sensor Data: such as, data from any temperature sensor and motion detector which you have installed at your home address and is connected to your smart meter.

- Submetering Data: such as energy data from specific devices that monitor energy consumption beyond the main meter (e.g. smart sockets/plugs).
- Your Payment Details: such as, your billing addresses and payment details.
- If we contact each other in writing, we may keep a record of that correspondence, this includes letter, email and enquiries submitted via our website.
- If you visit our website, Wix will collect data on our behalf such as your Internet Protocol (IP) address or any information you enter on our website; this may be processed at a later date.
- For more information about the data practises of Wix, please visit their Privacy Policy at <https://www.wix.com/about/privacy>.

## **2. Information we may receive from third parties**

2.1 Sometimes, we receive personal information about you from third parties. In particular:

- We receive historical and (30 minute-incremented) real-time smart meter usage data, energy consumption data for gas and electricity, and tariffs information from your energy meter and utilities providers; and the Data Communications Company, where this company provides the technical infrastructure which connects your smart meter with your utility provider's system.
- We receive historical and (30 minute-incremented) real-time smart meter usage data, energy consumption data for gas and electricity, and tariff information from your energy meter and utilities providers; and Data Collector / Data Aggregator companies, where these companies provide the technical infrastructure which connects your smart meter with your utility provider's system.
- We receive personal information, including tariff details, from your energy supplier and energy solutions installer. This information is required to set up your account for this service.

## **3. How we use your personal information**

3.1 We will use your personal information in order to:

- Deliver and improve the Services, including to help you monitor your energy consumption and find more efficient ways of using energy.
- Operate and personalise the Website and Portal.
- Generate energy usage and consumption reports for you.
- Respond to support tickets and help facilitate the resolution of any disputes.
- Manage our relationship with you, e.g. by responding to your comments or queries submitted to us on the Website or asking for your feedback or whether you want to participate in a survey.
- Update you with operational news and information about our Services, Website and our Portal e.g. to notify you about changes to our Website, website disruptions or security updates.
- Carry out technical analysis to determine how to improve the Services, Website and our App.
- Monitor activity on the Website and Portal, e.g. to identify potential fraudulent activity and to ensure compliance with the Terms & Conditions that apply to us and you.
- Manage our legal and operational affairs.
- Administrative and performance functions and activities.
- Provide you with marketing information about products and services via email which we feel may be of interest you, like advertising that may appear on the Website and/or Portal where this involves the use of cookies or similar technologies in order to provide a more personalized experience.

## **4. Our legal basis for the use of your information**

4.1 We process your personal information based on the following lawful grounds:

- To fulfil a contract, or take steps linked to a contract.
- Where you give us consent.
- For purposes which are required by law: in particular, responding to requests by government or law enforcement authorities conducting an investigation.

4.2 Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your personal information for other purposes, such as those set out above. You have a right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below:

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## 5.0 Who we share your personal information with

5.1 We will share your personal information with:

Who	Examples
Companies that help us run our business, support our IT infrastructure, and help us fulfil our contract obligations	<ul style="list-style-type: none"> <li>• Custard IT Services: To support our IT and security infrastructure</li> <li>• Co Law: To ensure we comply with all legal obligations</li> </ul>
Industry partners and other companies we work with	<ul style="list-style-type: none"> <li>• Simble: To support the validation of your bills and to provide you with a portal functionality showing you your energy analysis</li> <li>• Bid Energy: To validate your energy bills</li> <li>• Data collector/Data aggregator/ Meter operators</li> <li>• Energy suppliers</li> </ul>
Police, law enforcement agencies and other public authorities	<ul style="list-style-type: none"> <li>• Police forces</li> <li>• HMRC</li> </ul>
Your new energy suppliers	<ul style="list-style-type: none"> <li>• Your chosen energy supplier</li> </ul>
Debt Collection agencies	

5.2 In the event that the business is sold or integrated with another business, your personal information will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

## 6.0 Data Transfer, Storage and Security

We have security procedures in place to protect the loss, misuse, or alteration of information under our control. We have security measures in place to protect our user database and access to this database is restricted.

We restrict access to personal information to those who have a need to know and we implement arrangements to ensure that access to computerised records are available to personnel who need such access, and require passwords to be entered to allow access to personal information.

We have put procedures in place to deal with any suspected personal data breaches and will notify you and the supervisory authority of a breach where we are legally required to do so.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order. These countries include:

- Australia
- United States of America
- India
- Philippines
- Vietnam

Our servers are situated within the European Economic Area ("EEA"), however we collect data from wherever users are situated. The information that we collect may therefore be transferred to the UK from any other country in which you may be located, and our processing of such data will be subject to the UK's Data Protection laws rather than the laws of the country in which you are resident.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the Data Protection Act 2018.

### **7.0 How long will you retain my information?**

We will hold your personal information on our systems for as long as necessary to fulfil the purpose outlined in this Privacy Policy or until you request it is deleted (unless a longer retention period is required or permitted by law). Usually, you can expect us to keep your personal information for up to six years or as long as necessary.

Even if you delete or ask us to delete your personal information it may persist on backup or archived for legal, tax or regulatory purposes.

### **8.0 Your Rights**

You have the right to ask us for a copy of your personal information; to correct, delete or restrict (stop any active) processing of your personal information; and to obtain the personal information you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data with you or another controller.

In addition, you can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing).

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included applicable local

Data Protection law. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information you can get in touch with us using the details set out below.

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If you have unresolved concerns, you have the right to complain to the Information Commissioner Office (ICO), you can do this by contacting them via their website.