

FLEXI-ORB BUSINESS PRIVACY POLICY

Certi-fi Schemes Limited trading as The Flexible Energy Oversight Registration Body (Flexi-Orb) (“We”) are committed to protecting and respecting your privacy.

This policy sets out the basis on which we collect and process personal data, (**‘Your Data’** or **‘Data about you’**). Please read the following carefully to understand our views and practices regarding your Data and how we will treat it.

For the purpose of the Data Protection legislation and rules (the Act), we are the data controller. Our full details are Certi-fi Schemes Limited (Company No 08823843). Our registered address and trading address is Strawberry Fields Digital Hub, Euxton Lane, Chorley, PR7 1PS.

Your Data will be shared with a number of organisations as described in the “Uses made of your information” section below and any third parties (for example CRM database managers) who are engaged to process data on our behalf.

We will maintain a register of information (Flexible Energy Register) which can assist the agencies and organisations referred to below (where appropriate) to confirm or cross-reference details of energy generating, energy storing or energy saving installations held in properties around the UK. We will also grant access to the relevant emergency services, where necessary, and those responsible for managing the electricity grid to confirm details about devices, should they need access. The Flexible Energy Register will also provide important safety information about products and allow an easy way to confirm or register product warranties.

INFORMATION WE MAY COLLECT ABOUT YOU

We may collect and process the following Data about you if you have contacted us via our website, if you have signed up to our newsletter or about your installations when work is (or has been) carried out by you, which involves the provision of energy generating, energy storing or energy saving installations.

- We may collect and hold data about your organisation, its employees, your certifications, insurance backed guarantee providers, your liability insurance, CTSI Code Sponsor, Alternative Dispute Resolution Provider and case details.
- Your customer names, addresses and contact details (email and telephone) along with information about the installation which has been undertaken, details of the product you have installed and where the product is situated in your property. We will also hold details of any energy aggregator you use and insurance on the installation.

- If you contact us, by way of the website, we may collect and process data to help you with your enquiry. This includes your name, postcode and contact details (email and telephone) along with information related to your enquiry.
- If you have signed up to our newsletter. This includes your name, company name and email address.
- We send out a survey when work has been carried out to rate your customer's experience. We may also request additional surveys to be completed which we use for research or quality control purposes.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To provide to the emergency services if they need to locate the energy generating, energy storing or energy saving installation at your customer's property. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access.
- To provide to Distribution Network Operators, Independent Distribution Network Operators, and the Energy Network Association who need to be notified about or authorise the connection of devices to the electricity grid. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access.
- To provide to licensed energy aggregators who may contract to the National Grid to sell energy for you. We allow them access to our Flexible Energy Register where they have an agreement with us and have confirmed that they are accessing your data with agreement from you.
- To provide to CTSI Code Sponsors (bodies that ensure installers of energy systems operate in accordance with a set of consumer-focused rules) to allow them to confirm their members are meeting requirements to register works with us and in cases where they investigate a complaint. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access.
- For the registration of warranties and to assist in the event of a product recall for consumers. We do this where a manufacturer enters an agreement with us, and it is in the consumer's interest to have the registration completed.

- To provide to certification bodies who need to be notified about the installation of devices in order to comply with appropriate building regulations. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access.
- To provide to your insurance backed guarantee provider access to our Flexible Energy Register to audit your registered installations, where they have provided assurances and agreement to protect the data they may access.
- To provide anonymised information to departments and organisations (like the Department for Business, Energy and Industrial Strategy, Ofgem, the National Grid) relating to installations which will be the postcode of an installation and the installed device information. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access. The information they may access is limited.
- To provide trade associations operating in the energy sector access to information around installations in order for them to provide feedback and advice on the energy network infrastructure. We allow them to access our Flexible Energy Register where they have provided assurances and agreement to protect the data they may access. We only provide personal information if this is necessary.
- To provide finance lenders or finance brokers access to your registration information when you have a finance agreement with them, in order to confirm your registration and to check if appropriate protection is in place e.g. insurance. They will confirm to you that they are making checks with us.
- To provide your customer's with information related to any safety or decommissioning requirements of your energy storage device.
- To provide statistics on the performance of and nature of devices being installed.
- To provide information on the size of the devices, decommissioning and any grid trading capabilities.
- To provide information on the volume of installations with insurance.
- To provide information around the number of devices installed within the UK, by geographic region or postcode area.
- To provide anonymized statistics for the purposes of developing the safety of energy generating,

energy storing or energy saving installations and the wider market.

- To contact your customers with surveys that we use for research or quality control purposes.
- To provide you with our newsletter or marketing information, where you have consented to do so. You may withdraw your consent by emailing info@flexi-orb.com or by unsubscribing when you receive the newsletter or marketing information.

Where we provide personal information to those described above, we provide it to them on the basis that they will be the data controller of that information. They will use the information subject to their own privacy policy. A full list of the organisations and what we provide information to them for is set out at www.flexi-orb.com.

We use your data on the basis of the legitimate interests of ourselves and those to whom we provide your information. The Legitimate Interests being pursued are:

Interest	Explanation
Promoting the safety of energy generating, energy storing or energy saving installations	We share your information with manufacturers and others to ensure that any defects which may be a common fault can be identified quickly.
Helping consumer schemes monitor compliance with their rules	Consumer schemes may access the data we hold to ensure that their members are updating the Flexible Energy Register to provide information on devices properly and as required. This ensures that installers are acting in accordance with applicable consumer codes.
Supporting the requirements to notify Distribution Network Operators are met	There is an obligation to notify Distribution Network Operators and we allow this to be confirmed.
Supporting the operation of an effective energy market	We allow energy aggregators to confirm the type of systems that you installed to ensure that they can properly manage the power they can provide into the grid and your estimated returns.

To allow an effective warranty registration system	We allow product manufacturers and installers to confirm the details of products so that warranties can be activated and operate properly.
Complying with and supporting compliance with legal and regulatory requirements	We help other organisations to comply with their own legal and regulatory requirements.
To allow an effective way to help with product recalls	We allow product manufacturers access to your customer’s information in the event of a product recall or safety issue.
Support the requirements to notify certification bodies of installations to comply with building regulations	There is an obligation to notify relevant certification bodies of certain installations to comply with building regulations. This is in the interests of those using properties and surrounding them.
To allow the confirmation that the insurance in place for your installation is as indicated by the registered installer	We allow this to confirm there is insurance in place. This allows insurers and CTSI Code Sponsor operators to ensure that members of a CTSI Code Sponsor are acting properly.

The use by the emergency services cannot be carried out based on legitimate interests. The use of your customer’s information here is in the interests of public safety and is accessed to protect the health and safety of those who could be impacted by a fire surrounding an installation.

We also allow the use of your information where those accessing the information have your agreement or consent and provide anonymized information to others.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to those entities described above in the “Uses made of your information” section as set out.

We may also disclose your personal information to legal and other professional advisors, and to our or their suppliers (for example printers or hosting providers) who reasonably need to use

your personal information, so they can provide their services to us, and may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets.
- If all or substantially all of its assets are acquired by a third party, in which case Data about you held by it will be one of the transferred assets.
- If we are under a duty to disclose or share your Data in order to comply with any legal obligation, or to protect the rights, property, or safety of ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

YOUR RIGHTS

You have a number of rights in relation to your personal information. These are:

- The right to confirm if we are using data about you and to access details about what we are using and how;
- The right to lodge a complaint with the Information Commissioners Office;
- The right to request we rectify any inaccurate data or to have data which is incomplete for the purpose we hold it completed;
- The right to be forgotten. Which is the right to ask us to delete information about you and if it is appropriate to do so we will do so;
- The right to restrict what we do with data in specific circumstances, including where the accuracy of the data is contested, processing is unlawful or if we only need the data to meet legal requirements;
- The right to receive the data we hold about you in a format you can use to transfer the data electronically elsewhere.

You are also able to withdraw any consent you have provided for us to use your data at any time.

IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information

to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

WHERE WE STORE YOUR PERSONAL DATA

The Data about you that we collect 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 us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this privacy policy. Data will at all times remain subject to the provisions of the Act.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Data, 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 reasonable procedures and security features to try to prevent unauthorised access.

HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We will retain your data for as long as it is reasonably required for our legitimate purposes (which include the reasonable requirement of those who we provide data to) and for no longer. The storage of the data is reviewed but will often be held until we are advised that an energy storage system has been removed, although then we may retain the data to show how long it was in place. We may from time to time contact you to confirm the details of the property owner and whether the system is still working/in place.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us in writing, via email or by phone:

The Data Protection Officer
Flexi-Orb
Strawberry Fields Digital Hub
Euxton Lane
Chorley,
PR7 1PS

Email: info@flexi-orb.com
Phone: 0330 335 3382

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number: 0303 123 1113
ICO Website: <https://www.ico.org.uk>