

DataGlow Energy Privacy Policy (GDPR)

Who we are

This privacy policy applies to individuals interacting with DataGlow Energy, operators of <https://dataglow.energy/>. DataGlow Energy are registered with the Information Commissioner's Office in the UK with reference number 00010739424.

Maintaining the security of your data is a priority at DataGlow Energy and we are committed to respecting your privacy rights. We pledge to always handle your data fairly and legally. DataGlow Energy is also dedicated to being transparent about what data we collect about you and how we use it.

DataGlow Energy is a controller of personal data as defined in Article 4(7) of the UK GDPR. References to “we”, “our”, or “us” refer to DataGlow Energy, UK House 5th Floor, 164-182 Oxford Street, London, United Kingdom, W1D 1NN.

What does this policy cover?

This privacy policy relates to our interaction with individuals who share their details to express interest in our projects, request/obtain quotes, utilise our services, enter into agreements with us, or individuals that we may otherwise interact with us during our business. It also applies to sole traders and business customers, including suppliers and Partners. We have a separate policy for employees, volunteers, contractors and associates working for or on behalf of DataGlow Energy.

This policy provides you with information about:

- What personal data we collect
- Where we get our information from
- How we use your data
- The legal basis for DataGlow Energy processing your data.
- Who we share your personal information with
- How long we keep your data.
- How we protect your data
- Your rights
- Contact information

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. The current privacy policy is effective from 5th November 2025. Please check back frequently to see any updates or changes.

What personal data we collect

When we talk about personal information, we mean information about an individual that can identify them, like their name, address, e-mail address, telephone number and financial details. It can relate to customers (including prospective customers), their appointed representatives (e.g. powers of attorney or a nominated person who may act as a third party-advocate. Any reference to “information” or “data” in this policy is a reference to personal information about a living individual.

Continued on next page

Type of data	Description	Examples of how we use it
Contact	<ul style="list-style-type: none"> Names Address Contact details. Third party contacts (family member or nominated advocate) Business address Business name 	<ul style="list-style-type: none"> Marketing Analysis and profiling Enhancing our product and service offering Maintaining the accuracy and consistency of your information for all your products and services across DataGlow Energy Follow up calls for customer feedback Managing our business relationship with you Business to business marketing (Business customers only) Seeking investment opportunities (Business customers only)
Personal Details	<ul style="list-style-type: none"> Age Gender Family details Financial details Lifestyle and social circumstances 	<ul style="list-style-type: none"> Marketing Analysis and profiling Provision of financial advice, including billing and statementing Provision of advice for energy saving or community schemes
Consent and preferences	<ul style="list-style-type: none"> Ways we can communicate and market to you Information we obtain from third parties acting on your behalf 	<ul style="list-style-type: none"> Marketing Prevention of direct marketing to those who have opted out
Technical	<ul style="list-style-type: none"> Details on the devices and technology you use. Building and property information relevant to your query Land information such as utilities locations and boundaries, in cases where it is not publicly available information 	<ul style="list-style-type: none"> Making sure our products and services are fit for purpose. To provide quotes and plan/design for installation To provide services and maintenance to you for your products and services
Open data and public records	<ul style="list-style-type: none"> Electoral register Land register. EPC register Other information about you that is openly available 	<ul style="list-style-type: none"> Financial recovery To provide quotes and plan/design for installation
Location data	<ul style="list-style-type: none"> IP address 	<ul style="list-style-type: none"> Site security, fraud prevention and diagnostics Improve our website
Other	<ul style="list-style-type: none"> Feedback, complaints, and survey responses Your correspondence and communications with DataGlow Energy, including meeting transcriptions by AI notetakers 	<ul style="list-style-type: none"> To improve our services To remediate issues For reporting and legal obligations to the Ombudsman To inform marketing activities To create a record of discussions

Where do we get your information from?

Directly from you when you correspond with us, whether by phone, email, video call, chat facility or survey response.

From a third party-tracing agencies, credit referencing agencies, or publicly available sources such as social media platforms, the EPC register, Land Registry or the electoral register; or if you have been introduced to us by another company such as a developer, housing association, registered social landlord or Management Company.

This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this Policy.

How we use your data

We require this information to understand your needs and provide you with a better service, and for the following reasons:

To carry out our obligations arising from any contracts, business or commercial agreements entered between you and us and to provide you with the information, products, and services that you request from us, including the provision of an estimate and quote, and fulfilment of an order and after-sales support.

To provide you with advice and marketing information about other goods and services we offer. If you have opted in to receive marketing information, based on your marketing preferences we may deliver this information by post, telephone, e-mail, SMS, or personalised online marketing via our own systems such as social media platforms. Please note that if you choose not to receive online marketing, you will not see personalised marketing messages using your personal data, however you may still see generic online advertising about our products and services. We will not sell your data to third parties for them to market to you.

To ensure that content from our site is presented in the most effective manner for you and for your computer.

To tell you about changes to our services and products.

To comply with applicable legal or regulatory requirements.

Internal record keeping; and

To run our business in an efficient and proper way. This includes testing our systems, managing our financial position, business capability, planning, communications, corporate governance, and audit.

When you express interest to receive a service from us, the application form you fill out or the resulting contract may contain additional conditions relating to the way we use and process your personal information. These will apply in addition to the uses described in this document.

In some cases, we may use software or systems to make automated decisions (including profiling) based on the personal information we hold or collect from others. These may include:

Servicing activities such as

- (i) Personalising the content and design of communications and online services and
- (ii) Determining when to provide tailored communications about your DataGlow Energy products (e.g., as a result of changes in your personal circumstances or lifestyle) and the appropriate channels to use

These may be achieved using profiling in order to predict certain characteristics about you (e.g. your economic situation, interests, personal preferences, property or land characteristics or). The activities will not have a detrimental effect on you.

Marketing

DataGlow Energy aims to update you about news, offerings & services which are of interest and relevance to you as an individual or business.

If you have expressed a commercial interest or DataGlow Energy has identified a mutual interest, or you have opted in to receive marketing communications, DataGlow Energy may send you emails and/or postal marketing on the basis of consent or legitimate interest.

Direct marketing will adhere where appropriate to the Privacy and Electronic Communications Regulations, UK Advertising Codes, and UK Data Protection Legislation.

Individuals have the right to withdraw consent at any time. We will cease to process data if consent is withdrawn.

You have the right to opt out of marketing communications at any time, by:

- Making use of the simple “unsubscribe” link in emails; and/or
- Contacting DataGlow Energy via the contact channels set out in this Policy.
- Direct e-marketing communications will automatically cease if no engagement is recorded over a period of 12 months.

The lawful basis for DataGlow Energy processing your data.

General

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(a) for processing your personal data where we have your consent to do so.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(f) for the purposes of our legitimate interest.
- Article 9(2)(a) where processing Special Category Data with your Explicit Consent.

For some of your personal information you will have a legal, contractual, or other, requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate our contract. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “Contacting us” section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

Our legitimate interests

The legitimate interests that we will rely upon to process your personal data include:

Promotion of DataGlow Energy offerings, services and advice where any of these are expected to be of interest to you as a potential stakeholder in our projects.

Protecting customers, employees and other individuals and maintaining their safety, health, and welfare.

To improve our site to ensure that content is presented in the most effective manner for you and for your computer.

Complying with our legal and regulatory obligations;

- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling interested individuals' contacts, queries, complaints or disputes;
- protecting DataGlow Energy, its employees, Partners, customers and other stakeholders, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to DataGlow Energy;
- effectively handling any legal claims or regulatory enforcement actions taken against DataGlow Energy; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

Who do we share your personal information with?

Our service providers and suppliers

To make certain services available to you and to deliver our contractual obligations to you, we may need to share your personal data with some of our trusted service partners, on the basis of Article 6(1)(b) UK GDPR.

These include design, planning, delivery, installation, and surveying service providers, namely DataGlow Energy approved partners and appointed contractors.

In particular Dataglow may share your personal data, on a joint controller basis, where it is necessary and appropriate to do so; for example we will share necessary data with Kensa where you have expressed an interest in including your home or business in one of our Superloop projects.

These service providers may use servers located in secure data centres around the world, and personal data may be stored in any one of them.

DataGlow Energy only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to DataGlow Energy and to you, and for no other purposes.

Other third parties

Aside from our service providers, DataGlow Energy will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data with:

- Credit reference agencies where necessary for card payments, identity checking and anti-money laundering.
- Governmental bodies, regulators, law enforcement agencies, courts/tribunals, and insurers where we are required to do so:
 - to comply with our legal obligations;
 - to exercise our legal rights (for example in court cases);
 - for the prevention, detection, investigation of crime or prosecution of offenders; and
 - for the protection of our employees and customers.
- Examples include the HMRC, credit reference agencies, data verification and tracing agencies, fraud prevention agencies.

Protecting your data outside the UK

The data that we collect from you may be transferred to, and stored at, a destination outside the UK to third-party suppliers, delegates, or agents. We will take all necessary steps to make sure that your data is treated securely and in accordance with this privacy policy, to ensure your personal information is handled with the same protections that we apply ourselves.

We'll only transfer your data to a recipient outside the UK where we're permitted to do so by law (for instance, (A) where the transfer is based on standard data protection clauses adopted or approved by the UK's Information Commissioner's Office, (B) where the transfer is to a territory that is deemed 'adequate' by the UK, or (C) where the recipient is subject to an approved certification mechanism and the personal information is subject to appropriate safeguards, etc).

How do we protect your data?

DataGlow Energy is committed to keeping your personal data safe and secure.

Our security measures include:

DataGlow Energy's websites are HTTPS with encrypted connection. We also protect the security of your data during transmission using Secure Sockets Layer (SSL) encryption software.

Security controls which protect the entire DataGlow Energy IT infrastructure from external attack and unauthorised access; and

Internal policies setting out our data security approach and training for employees; detailed in our IT policy.

How long do we keep your data?

We will determine the length of time we keep it for based on the minimum retention periods required by law or regulation. We will only keep your personal information after this period if there is a legitimate and provable business reason to do so.

We will not retain your data for longer than necessary for the purposes set out in this Policy.

You should always check the Privacy Policy and terms and conditions of your Customer Service Agreement for specific terms applicable to you.

Your rights

- The right to be informed about how we process your personal information. This right is met by the provision of this document.
- The right to obtain confirmation that we process personal data held about you, at any time, and if we do process your personal data, you have the right to access that data. This may be subject to a fee specified by law.
- The right to ask us to correct any inaccurate personal data we hold about you, free of charge.
- The right to ask us to erase any personal data we hold about you.

This right only applies where for example:

- We no longer need to use the personal data we hold about you to achieve the purpose it was originally collected for.
- You withdraw your consent if we are using your personal data based on that consent.
- Where you object to the way we use your data, and there is no overriding legitimate interest.
- The right to restrict our processing of the personal data we hold about you.

This right only applies where for example:

- You dispute the accuracy of the personal data we hold about you.
- You would like your data erased, but we are required to hold it to stop its processing.
- You have the right to require us to erase the personal data but would prefer we restricted the processing of the data instead.
- Where we no longer need to process the personal data to achieve the purpose, we originally collected it for, but you need the data for legal claims.
- The right to object to our processing of personal data we hold about you, including for the purposes of sending marketing materials to you or using your personal information for profiling purposes).
- The right to receive personal data, which you have provided to us, in a structured, commonly used, and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
- The right to withdraw your consent. This only applies where we are relying on your consent to use your personal data (e.g. to provide you with marketing information about services or products).
- For automated decisions (including profiling), you have the right to:
 - o Obtain an explanation of the decision and challenge it.
 - o Request for the decision to be reviewed by a human being.

DataGlow Energy does not currently perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us.

If you have any questions about any aspect of the privacy policy or wish to exercise any of your rights, including your marketing preferences, please contact DataGlow Energy using the contact information below.

Contact Information

If you have any questions about how DataGlow Energy uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

Write to us using the contact us section of our website <https://dataglow.energy/contact>

Write to us at: DataGlow Energy UK House 5th Floor, 164-182 Oxford Street, London, United Kingdom, W1D 1NN.

If you have any concerns about the way we process your personal data or are not happy with the way we have handled a request by you in relation to your rights, you have the right to make a complaint to the Information Commissioner's Office:

First Contact Team

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF