

## 1. Home IQ and your personal data

For our Home IQ product, the data controller is British Gas Services Limited.

This is our privacy notice for Home IQ. It explains your statutory rights and how we collect and use your personal data. It describes the processing activities that are carried out by 1. British Gas Services Limited, the purposes for which these activities are performed and the legal bases that British Gas Services Limited relies upon for these processing activities.

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, and we will communicate any significant changes to you.

You can contact Centrica's data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact our data protection officer at [privacy@centrica.com](mailto:privacy@centrica.com).

## 2. Personal data we collect

We collect the following types of personal data:

- **Your contact details and the contact details of people associated with your Home IQ product:** information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your account or order.
- **Information and details of other people linked to your Home IQ product:** information about your account with British Gas including your login details for our websites and mobile applications, age, gender, date of birth, unique account number, unique customer identification, contract details, job details (e.g. boiler repairs), household details, property type, insurance policy details, nominees, executors, or people with a power of attorney and their details, or someone else set up to pay your bill, premise details, previous supplier, proposed new supplier, meter and gas point numbers, meter details, energy consumption, tariff details, marketing preferences, repairs and service history, claims history, complaints details, incident details, and dispatch appointment details.
- **Claim history and criminal convictions:** we will collect information on you for the purposes of providing insurance. As part of the pricing procedure we require information of your previous claims history and criminal convictions.
- **Vulnerability information:** information that allows us to understand whether you are in a vulnerable situation, including health and disability information.
- **Financial information:** information that allows us to understand your creditworthiness and financial position.
- **Anti-fraud information:** when you purchase Home IQ from us, we may carry out anti-fraud checks.
- **Transaction and payment information:** credit/debit card details and bank account details you provide to make payment for the products and services you purchase from us.
- **Delivery information:** information relating to the delivery of products and services to you.
- **Purchase and account history:** records relating to the products and services which you have purchased or used.
- **Lifestyle and demographic insight information:** how you use our services and your connected devices such as Hive and information we receive from devices such as Hive Leak Sensor.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.
- **Records of your discussions with our customer support teams:** when you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes

when you send us emails, phone our support team or contact us through social media such as through Twitter or on Facebook.

- **How you use mobile applications and websites:** we use technology such as cookies (subject to your cookie preferences) when you use our applications or websites, we collect information about the pages you look at and how you use them.
- **Location information:** your smartphone or computer's IP address may tell us an approximate location when you connect to our websites but this will be no more precise than city, state or country.
- **Device and machine information:** information about the computer hardware and software on your computers and smartphones that is used to connect or communicate with us.
- **Advertising and direct marketing preferences and responses:** information about how you respond, or interact with, any direct marketing or advertising communications directed to you, including any requests for these communications to stop.
- **Exercising your rights:** if you exercise any of your statutory rights under data protection law, we will keep a record of this and how we respond.

You are not required to provide to us any of the personal data described above, however, if you do not do so, you may not be able to purchase our products and services or the functionality of our products may be reduced.

### 3. What we use your personal data for and why

#### *Where we process your personal data because of our contract*

We process these items of your personal data to enter or fulfil the contract between us, including:

Reason or purpose	Personal data used
Provide our services to you and maintain your account (including for quality assurance purposes, and handling any complaints you might make)	<ul style="list-style-type: none"> <li>• All personal information we collect as listed in Section 2.</li> </ul>
Take payment for our products and services and debt collection	<ul style="list-style-type: none"> <li>• Information and details of other people linked to your Home IQ product</li> <li>• Transaction and payment information</li> <li>• Your contact details and the contact details of people associated with your Home IQ product</li> </ul>
Deliver products to you	<ul style="list-style-type: none"> <li>• Information and details of other people linked to your Home IQ product</li> <li>• Delivery information</li> <li>• Your contact details and the contact details of people associated with your Home IQ product</li> </ul>
Answer your complaints or questions	<ul style="list-style-type: none"> <li>• The personal data which is necessary for us to deal with your complaint, which will depend on the nature of your complaint</li> <li>• Your contact details and the contact details of people associated with your account</li> <li>• Account information and details of other people linked to your account</li> <li>• Transaction and payment information</li> <li>• Purchase and account history</li> </ul>
To deliver service communications (such as bills), and tailoring those communications to your circumstances	<ul style="list-style-type: none"> <li>• Your contact details and the contact details of people associated with your Home IQ product</li> <li>• Information and details of other people linked to your Home IQ product</li> </ul>

Manage claims you make	<ul style="list-style-type: none"> <li>All personal information we collect as listed in Section 2 apart from vulnerability information.</li> </ul>
Insurance pricing and modelling	<ul style="list-style-type: none"> <li>All personal information we collect as listed in Section 2 apart from vulnerability information.</li> </ul>

***Where we process your personal data because we're legally obliged to***

We process these items of your personal data because we have a legal obligation to, including:

Reason or purpose	Personal data used
Investigating misuse of your account, crime and fraud	<ul style="list-style-type: none"> <li>The personal data which is necessary for us to investigate the issue, which will depend on the nature of the problem.</li> <li>At a minimum, this will include your name and contact information and information about your account and transaction history.</li> </ul>

***Where we process your personal data because there is a substantial public interest to***

We process these items of your personal data because there is a substantial public interest that the public has access to insurance products:

Reason or purpose	Personal data used
Insurance pricing and modelling	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your Home IQ product</li> <li>Information and details of other people linked to your Home IQ product</li> <li>Claim history and criminal convictions</li> </ul>

***Where we process your personal data because we have a legitimate interest to***

We process these items of your personal data because we have a legitimate interest to do so. We process the following categories of personal data, including:

Reason or purpose	Personal data used
Maintain and improve our products and services, e.g. Optimise business processes, quality assurance purposes, support efficient management of our staff, analyse performance of webpages and provide relevant content to you	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your Home IQ product</li> <li>Information and details of other people linked to your Home IQ product</li> <li>Transaction and payment information</li> <li>Delivery information</li> <li>Purchase and account history</li> <li>Lifestyle and demographic insight information(including information from connected devices such as Hive)</li> <li>How you use mobile applications and websites</li> <li>Location information</li> </ul>

	<ul style="list-style-type: none"> <li>Advertising and Direct Marketing preferences and responses preferences and responses</li> </ul>
Develop and extend products and services: e.g. Glazing, Lock, Roof and Pest, Boiler IQ	<ul style="list-style-type: none"> <li>All the personal data in categories listed in Section 2.</li> </ul>
Direct marketing. If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to because of law. However we will never send you direct marketing where you have opted out of receiving direct marketing communications	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your Home IQ product</li> </ul>
For market research purposes, e.g. to understand how innovative new products assist our customers' evolving needs	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your Home IQ product</li> <li>Purchase and account history</li> </ul>
Staff training	<ul style="list-style-type: none"> <li>All personal information we collect as listed in Section 2</li> </ul>
For the establishment, exercise or defence of legal claims	<ul style="list-style-type: none"> <li>All personal information we collect as listed in Section 2</li> </ul>
Maintain accuracy and relevance of your data	<ul style="list-style-type: none"> <li>All personal information we collect as listed in Section 2</li> </ul>

***Where we process your personal data because you have allowed us to***

We process these items of your personal data when you have provided your consent to the processing, you may revoke your consent at any point:

Reason or purpose	Personal data used
Direct marketing	<ul style="list-style-type: none"> <li>Your contact details and the contact details of people associated with your Home IQ product</li> <li>Information and details of other people linked to your Home IQ product</li> </ul>

***Where we process your personal data because of substantial public interest***

We process these items of your personal data because there is a substantial public interest to provide insurance products.

Reason or purpose	Personal data used
Insurance pricing and modelling	<ul style="list-style-type: none"> <li>Claim history and criminal convictions</li> <li>Account information and details of other people linked to your account</li> </ul>

***Where we process your personal data so you can't be identified any more***

We may anonymise and aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and developing new products and services and assess future providers of services.

#### 4. Sources we collect your personal data from

We will collect personal data from a number of sources. These include:

- **Directly from you:** when you set up an account with us, purchase products or services from us, submit information via our websites or apps, complete forms we provide to you, enter our competitions and promotions, make a claim, make a complaint, exercise your statutory rights, contact us by phone, email or communicate with us directly in some other way.
- **Our website and mobile applications:** we collect information about how you use them and any smart devices you connect to them.
- **Other companies we work with:** provide us with information to help us deliver our products and services to you. These include:
  - **Companies in the same group of companies as us:** who may provide relevant information about the products and services bought from them.
  - **Service engineers:** who will provide us with information about your boiler, central heating, and any insured products.
  - **Other companies' apps and products:** provide us with information if you connect them to our products or services.
- **Credit and Anti-fraud reference agencies:** provide us with information about your transaction and claim history and credit history.
- **Third party data and insight providers:** companies which provide us with relevant information about you which we append to our existing records, to help us operate our business and deliver our services to you.
- **The government and regulators:** provide us with information about the complaints they receive.
- **Social media:** information you submit to our social media accounts.
- **Other people linked to your account:** if someone pays for your bill on your behalf, or you are set up to pay someone else's bill, we may obtain information about you from them.
- **Our business customers:** provide us with information about their own customers.
- **The emergency services:** may provide us with information e.g. if there has been a gas leak.

#### 5. Who we share your personal data with

We share personal data with the following categories of third parties:

Who	Examples
Companies in the same group of companies as us	Our parent company, Centrica Plc
Any party approved by you	A finance company, if you want to take out a financing service
Advertising partners	<ul style="list-style-type: none"> <li>• Google</li> <li>• Mediacom</li> <li>• Awin</li> <li>• Rakuten</li> <li>• Facebook</li> <li>• Indicia</li> <li>• Brandwatch</li> <li>• Twitter</li> <li>• Lithium</li> </ul>
Delivery companies	<ul style="list-style-type: none"> <li>• Royal Mail</li> <li>• Grassroots</li> <li>• Communisis – Print and mail fulfilment</li> <li>• VST – To create braille and large print</li> </ul>

Credit and Anti-fraud reference agencies	<ul style="list-style-type: none"> <li>• Equifax</li> <li>• Experian</li> <li>• CallCredit</li> </ul>
Debt collection agencies	<ul style="list-style-type: none"> <li>• TDX</li> </ul>
Industry partners	<ul style="list-style-type: none"> <li>• AXA Insurance UK plc: to provide insurance pricing and underwriting services</li> <li>• AmTrust Europe Limited: to provide you with legal underwriting services</li> <li>• Arc Legal Assistance Limited: to administer and handle legal claims.</li> <li>• Flood Re: to provide underwriting services</li> <li>• PCL: to provide Home Insurance credit funding</li> </ul>
Police and law enforcement	
The government or our regulators	<ul style="list-style-type: none"> <li>• Information Commissioner’s Office</li> <li>• Financial Conduct Authority</li> </ul>
Companies that help us run our business, support our IT infrastructure and to further understand our customers	<ul style="list-style-type: none"> <li>• Survey Monkey – To answer business questions around customer perception / experience / understanding;</li> <li>• Zeta – To send you emails;</li> <li>• Virtuatel – To conduct automated customer surveys;</li> <li>• Pega – To provide customer engagement and digital process automation for marketing; and</li> <li>• Adobe – To provide analytics of various Centrica websites.</li> <li>• Optilead - optimising our online sign-up experience</li> </ul>

## 6. Direct Marketing

**Email, SMS, post and telephone marketing:** from time to time, we may contact you by email, SMS, telephone or post with information about our products and services we believe you may be interested in. When you call British Gas we may also provide you with information about products and services we believe you may be interested in.

If you have not consented to receiving Direct Marketing communications, we will only send these communications to you when permitted to do so by law, but in all circumstances we will respect your marketing preferences which you set when you first create your account with us (or you first deal with us), or which you update from time to time.

You can let us know at any time that you do not wish to receive marketing messages by sending an email to us at [privacy@centrica.com](mailto:privacy@centrica.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in any email marketing messages or by replying STOP to the number indicated on any marketing text messages we may send to you.

## 7. Direct Marketing & Advertising on websites and mobile applications

You can find out more about cookies and how to manage their use by reading our cookie policy, which is available at: <https://www.britishgas.co.uk/global-maintenance/cookies-policy.html>

The details here provide a high level overview of how and where we capture and / or use personal data on our own and third party websites and mobile applications.

### **British Gas Websites and Mobile Applications**

When you visit any of our websites or download any of our mobile applications you will always be provided with access to the site's or application's own privacy notice and cookie policy.

Our aim is to ensure that our websites and mobile applications are always working optimally for those who use them. When you visit our websites and you are not logged in to your British Gas account i.e. you are an anonymous visitor, we will use cookies and similar technologies - in accordance with your cookie preferences - to track anonymously details such as response times, the pages you view and the functionality you use. No individual is uniquely identifiable from this data and it is used purely to enable us to constantly review and improve these services.

Any adverts you may see whilst using the website anonymously will be generic in nature i.e. it will not use any personal data to 'personalise' the advert to you.

If you chose to complete an online application, enquiry or other form then the form will set out explicitly how the data you provide will be used.

When you are logged in we will use cookies and similar technologies - in accordance with your cookie preferences - to track your use of the site or application. In this instance some data may be recorded to your record to enable us to provide the best ongoing service to you.

In this instance any adverts you see may be tailored specially to you – for instance if you are already a Home IQ customer adverts for Home IQ would not be appropriate.

### **Third party websites and applications**

We work with advertising partners, including social media sites and providers, to show you advertising about our products and services, including those offered by group companies. This takes place on third party websites or mobile applications where our advertising partners have purchased advertising space. To provide you with the most appropriate advertising content, our advertising partners use information gathered anonymously via cookies and similar technologies about the websites, mobile applications, social media content and ads you interact with or view when connected to the Internet, as well as information which we provide to them, to make sure the advertising you see is more relevant to you.

## **8. Transferring your personal data internationally**

British Gas is part of a global organisation and in common with other organisations, we use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our customers are located. This includes countries outside the European Economic Area ("EEA") and to countries that do not have laws that provide specific protection for personal data. We have taken and continue to take steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

## **9. How long we keep personal data for**

We will keep your personal data for as long as necessary in order to achieve the processing purposes.

## **10. Your rights in relation to your personal data**

You may have the following rights in relation to your personal data:

- the right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the blocking or deletion of your personal data in some circumstances;
- the right to request that we port elements of your data either to you or another service provider;
- the right to object to us processing your personal data (where we do so only because you have consented, or because we are using automated means to make decisions that affect you); and
- the right to withdraw your consent.

You only have the benefits of some of the above rights in limited circumstances, which depend on the legal reason why we collected your personal data.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details below.

## **11. Getting in touch**

If you have any privacy-related questions or comments, please contact Centrica's data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact our data protection officer at [privacy@centrica.com](mailto:privacy@centrica.com).

If you are unhappy with the way we are using your personal data you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

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