



This Privacy Policy explains when and why we collect personal information about people who visit our website or with whom we communicate, how we use this data, the conditions under which we may disclose it to others and how we keep it secure.

This applies to <https://www.ebrokerdirect.co.uk>, (collectively referred to as the “Site”), and all other communications with individuals through written or oral means, such as email or phone (collectively, together with the Site, our “Service”).

We may change this Policy from time to time so please check this page occasionally to ensure that you’re happy with any changes. By using our website, you’re agreeing to be bound by this Policy.

The terms within this Privacy Policy represent your ‘Right to be informed’ under GDPR law.

1. Definitions used in this Privacy Policy

“Agent” means a customer of eBroker Direct Limited who uses the Service and has agreed to the eBroker Software Licence and Introducer Agreement – typically (but not exclusively) a company involved in the brokerage of UK energy contracts.

“Personal Data” means any information relating to an identified or identifiable natural person entered on the Site.

“Public Area” means the area of the Site that can be accessed both by Agents and Visitors, without needing to log into System Manager and/or the Service stored at eb-d.uk.

“User” means either an employee or representative of an Agent.

“Visitor” means an individual other than a User, who visits the Site who may or may not enter their Personal Information on the Site but has no access to System Manager and/or the Service stored at eb-d.uk.

2. What information do we collect on the Site?

When a Visitor accesses the Site, we may automatically record certain information from the Visitor’s device by using various types of technology, including cookies. This “automatically collected” information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Site, the pages or other content the Visitor views or interacts with on the Site, and the dates and times of the visit, access, or use of the Site.

3. How is your information used?

We use the information that we collect in a variety of ways in providing the Site and operating our business, including the following:

- 3.1 Improvements. We use the information to understand and analyse the usage trends and preferences of our Visitors, to improve and develop new products, services, features, and functionality.
- 3.2 Communications. We may use a Visitor's email address or other information to contact that Visitor (i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or defamation issues related to the Personal Data posted on the Site or (ii) with updates on promotions relating to products and services offered by us. You have the ability to opt-out of receiving any promotional communications by emailing support@ebrokerdirect.co.uk
- 3.3 Cookies and Tracking Technologies. We use automatically collected information and other information collected on the Site through cookies and similar technologies to: (i) personalise our Site, such as remembering a Visitor's information so that the Visitor will not have to re-enter it during a visit or on subsequent visits; (ii) provide customised content, and information; (iii) monitor and analyse the effectiveness of Site and third-party marketing activities and; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed.
- 3.4 Analytics. We may use Google Analytics on www.ebrokerdirect.co.uk to measure and evaluate access to and traffic on the Site, and create user navigation reports for our Site administrators. Google operates independently from us and has its own privacy policy, which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate Visitor activity on our Site.
- 3.5 Decision Making. eBroker Direct does not use any personal information from past, current or prospective Visitors for profiling (automated processing of personal data to evaluate certain things about an individual); or automated decision-making (making a decision solely by automated means without any human involvement), representing your 'Rights related to automated decision making and profiling' under GDPR law.

We take measures to protect the technical information collected by our use of Google Analytics. The data collected will only be used on a need-to-know basis to resolve technical issues, administer the Site and identify Visitor preferences; but in this case, the data will be in non-identifiable form. We do not use any of this information to identify Visitors.

4. Who has access to your information?

Except as described in this Policy, we will not intentionally disclose the Personal Data that we collect or store on the Site to third parties without the consent of the applicable Visitor. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

- 4.1 Service Providers. We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us – for example, our development team may use contractors from time to time. These third parties may have access to, or process Personal Data as part of providing the Site for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.
- 4.2 Non Personally Identifiable Information. We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for

various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our Visitors interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Site.

- 4.3 Law Enforcement, Legal Process and Compliance. We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws.
- 4.4 We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Site and any facilities or equipment used to make the Site available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.
- 4.5 Change of Ownership. Information about Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

5. Your Choices

- 5.1 Access, Correction, Deletion. We respect your privacy rights and provide you with reasonable access (representing your 'Right to Access' under GDPR law) to the Personal Data that you may have provided through your use of the Site. The personal data we hold on you can be provided to you in CSV format within thirty (30) days to allow ease of re-use for other services (representing your 'Right to data portability' under GDPR law). If you wish to access or amend any other Personal Data we hold about you, or to request that we delete or transfer any information about you (representing your 'Right to erasure' under GDPR law), you may contact us by email at support@ebrokerdirect.co.uk. At your request, we will have any reference to you deleted or blocked in our database.
 - 5.1.1 You may update, correct, or delete your Personal Data by emailing support@ebrokerdirect.co.uk (representing your 'Right to rectification' under GDPR law). Please note that while any changes we make will be reflected in active databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.
 - 5.1.2 You may decline to share certain Personal Data with us, or choose to request the restriction or suppression of your personal data (representing your 'Right to restrict processing' under GDPR law), in which case we may not be able to provide to you some of the features and functionality of the Site, the Service and System Manager.
 - 5.1.3 At any time, you may object to the processing (representing your 'Right to object' under GDPR law) of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact support@ebrokerdirect.co.uk. You also have a right to lodge a complaint with data protection authorities including the ICO (Information Commissioner's Office) in the UK.

- 5.2 Navigation Information. You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the Google Analytics Opt-out feature.
- 5.3 Opting out from Commercial Communications. If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to support@ebrokerdirect.co.uk. Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request.

6. Third-party services outside of our control

The Service may contain features or links to web sites and services provided by third parties (for example, Google Maps which is used for address locations). Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Site. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Site. We encourage you to learn about third parties' privacy and security policies before providing them with information.

7. Data security precautions in place to prevent loss, misuse or alteration of you information

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use SSL technology to encrypt data during transmission through public internet, and we also employ application-layer security features to further anonymise Personal Data.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Site, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us by emailing support@ebrokerdirect.co.uk.

If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

8. Data retention

Personal Data entered on the Site will be stored for as long as we need it to fulfill the purpose for which we have initially collected it, unless otherwise required by law.

9. Settings

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Site. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Site is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Site. We cannot and do not guarantee that information you post on or transmit to the Site will not be viewed by unauthorised persons.

10. Data Transfer

As part of the services offered to you through the Site, the information which you provide to us may be transferred to countries outside the European Union (“EU”). These countries may not have similar data protection laws to the UK. By submitting your Personal Data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

11. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Site, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Site after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

12. Contact Us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at support@ebrokerdirect.co.uk. If you have any concerns or complaints about this Policy or your Personal Data, you may contact eBroker Direct Limited’s Data Protection Officer by email at support@ebrokerdirect.co.uk.

13. Last Update

This policy was last updated on 17th May 2018