

Sark Electricity Limited GDPR Privacy Policy

We understand that privacy and the security of your personal data is extremely important.

1. This Policy

This policy describes how we collect and use personal data about you, in accordance with [The Data Protection \(Bailiwick of Guernsey\) Law, 2017](#) (The Law) and any other national implementing laws such as [GDPR](#), regulations and secondary legislation, as amended or updated from time to time as it applies to Sark Electricity Limited (SEL).

It also explains what we do to keep your information secure and where and how we collect your personal data, as well as your rights over any personal data we hold about you.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

2. Definitions

GDPR

[General Data Protection Regulation Act.](#)

Data Controller (Not Required for every Business)

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

Data Processor

Data Processor means any natural or legal person who processes the data on behalf of the Data Controller.

Data Subject

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

3. Who Are We?

We are Sark Electricity Limited. In this privacy policy, references to **Sark Electricity Limited, Sark Electricity, SEL, we, us** or **our**, in the singular or the plural, means 'Sark Electricity Limited. Our Registered office is at 4 Rozel Terrace, Mount Durand,

St Peter Port, Guernsey, GY1 1EB. When we refer to any of our sites, we mean any website or app, including e-editions published by us regardless of how you access it.

This policy also applies to any other businesses that we add in the future. For all our sites, and brands, Witney Price Group Holdings Limited is the Data Controller of the personal information that we gather about you.

We are required under [The Law](#) to notify you of the information contained in this privacy policy.

Our principles for processing personal data are:

- **Fairness and lawfulness.** When we process personal data, the individual rights of the Data Subjects must be protected. All personal data must be collected and processed in a legal and fair manner.
- **Restricted to a specific purpose.** The personal data of Data Subject must be processed only for specific purposes.
- **Transparency.** The Data Subject must be informed of how his/her data is being collected, processed and used.

Witney Price Group Holdings Limited is the controller and we are responsible for your personal data. The Data Protection Officer (DPO) is responsible for overseeing questions relating to this notice,

Contact details for the DPO - Mr James Penney.

4. What personal information do you collect and how?

While using our Site, we may ask you to provide us with certain personal data that can be used to contact or identify you. Personal data is any information that directly or indirectly identifies a natural person ("Personal Data").

We may collect and process information about you including:

- your name,
- your date of birth,
- your contact phone numbers (including mobile),
- your email and postal address,
- information collected when you participate in any poll or quiz via social media,
- information we buy or obtain from third parties, including marketing lists,
- your payment details,
- your employment and lifestyle information,
- information that you provide by filling in forms on our website,
- details of your visits to our website and any transactions you carry out on the website,
- any other information you have voluntarily given us.

We mainly collect this information from you when you give it to us voluntarily. However, we may also collect it from other sources if it is legal to do so. This can

include institutions or people you have authorised to provide information on your behalf (for example, directors, trustees or guardians), third-party service providers, government agencies, and others. We may also combine information available from public sources.

For example, we may collect data:

- when you submit a contact request on our website,
- when we obtain information when we carry out a credit search at a credit search referencing agency,
- when you register for an account. Please note that when registering for an account you are automatically opted into our email communication where that communication relates to your account only. Emails can inform you about marketing settings, changes to our website and other relevant changes about the company. If applicable to you, you can later opt out of these emails by going to the email preferences page in your account. During web account registration, you also have the option to opt in as a subscriber to our newsletters, where you have agreed we may use your data to contact you with special offers, updates and blog content. We process this data based on your consent. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before your withdrawal.
- when you submit a complaint or raise a concern.
- when corresponding with you, for example, by email. We process information supplied by email using standard email applications (e.g. [Outlook](#) and [Exchange](#)).
- when you interact with our content either directly or when shared via third party services, including social media, such as [LinkedIn](#), amongst others. [LinkedIn](#) is based in the USA and is part of the [EU-US Privacy Shield](#) framework.

We use this data for monitoring how well our content is performing (how many views it has, who likes it, who shares it etc.) when we process your personal information in relation to our newsletter sign-up process. We use [Mailchimp](#), amongst others, to deliver our newsletter. [Mailchimp](#) is a UK-based organisation.

- when you sign up to an event. We use [Ticket Tailor](#), amongst others, to manage our events registration. [Ticket Tailor](#) is a UK-based organisation.
- when you make an enquiry made by phone or in person,
- for other commercial purposes such as:
 - to meet our legal contractual obligations,
 - to recognise you as being a customer,
 - for fraud prevention and detection,
 - to maintain the health and safety of members of the public, our staff and our customers,
 - for meeting corporate requirements including potential mergers and acquisitions,
- to process any transactions when you purchase our goods and services,
- to process your credit/ debit card information when used to pay for our goods and services and dealing with refunds,
- so that we can provide our products and services to you,

- to improve our products and services to you. We use data collected through the use of customer surveys and cookies for research and analysis.
- to communicate with you as well as send you details of special offers and discounts relevant to you,
- so that we can respond to queries and any claims made against us.

It should also be noted that we may need to make your personal data available to other third parties such as:

- regulators who may request information when carrying out their functions,
- other third parties who have a legal right to access personal data e.g. the Police or the Courts.

Finally, to meet our regulatory obligations to you; such as if you choose to exercise your data rights e.g. through a subject access request.

5. How do we use your Personal Data?

We want to provide you with products and services which you will want to use and it is collected for this purpose and for the effective administration of the underlying business. We may use, and permit others to use, your personal data as set out below.

We may use information about you to provide and manage the products and services you have subscribed to or purchased, to help us customise our products or services for you, to personalise your visits to our sites, to help us to choose products and services we think will interest you, for market research and to improve the usefulness of our sites, products and services.

We also use your personal data to contact you, including to notify you about changes and updates to products or services, to evaluate the performance of our products and services and to develop new products and services.

We may use your information for the management of our business and improving the operation of our business and that of our business partners, to assess our internal processes and carry out financial checks.

We may monitor, record and store records of calls, email, text messages, social media messages, in person meetings and other communications where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, for evidential purposes, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes.

We may use your data to comply with legal and regulatory obligations.

We may make use of your personal information for direct marketing activities, with your consent or as permitted by law. By direct marketing activities, by which we

mean the communication directly to particular individuals (by e-mail, post or telephone) of any advertising or marketing material.

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us at director@sarkelectricity.com.

We may analyse your data, including whether or not you open a newsletter or click on links, and analyse data, gathered thorough our websites and advertising partners, including by analysing your data in aggregated form into categories (known as segments), to help target offers to you that we think are of interest or relevance to you.

We may disclose details about the use of the sites to other businesses e.g. to demonstrate patterns of use to advertisers and others. The information we pass on will be anonymised. We compile anonymous records of user trends which we may make use of ourselves or pass to our associated companies, including advertising networks.

If you log-in to our sites using social media, for example, [Facebook](#), [Google+](#), [Twitter](#) or similar social media platforms, you are granting permission to the social media platform to share your user details with us. This will include your name and email address which will then be used to form a user identity.

If you send us a picture, or video, for publication you confirm that you have the consent of all of the people in the picture or video. If the picture, or video, features a child, or children, you confirm that you are the parent or guardian of the child, or children, and have the legal right to grant consent (or the parent or guardian of the child, or children, has granted such consent).

If you enter a competition, any personal information that you share with us will be kept secure and only used in line with the relevant terms and conditions of the competition unless you have opted-in to future marketing from SEL and/or the supplier.

6. What are the legal grounds for our processing of your personal information?

SEL' legal basis for collecting and using the personal data described in this GDPR Privacy Policy depends on the personal data we collect and the specific context in which we collect the information and is captured within the following conditions:

- SEL needs to perform a contract with you,
- you have given SEL permission to do so,
- processing your personal data is in SEL' legitimate interests,
- SEL needs to comply with the law.

7. How long do you keep my information for?

SEL will retain your personal information only for as long as is necessary for the purposes set out in this GDPR Privacy Policy.

SEL will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

8. Who do you share personal information with?

We may reveal your personal information to other people, including in the following circumstances:

- we may share your data with third parties that provide database-, server-, maintenance-, security-, or other similar services to us (hereinafter referred to as 'data processors'). If we provide access to your data, we require the third parties to keep your data confidential and instruct these parties to process this data only on behalf of us,
- we may pass personal information to external agencies and organisations, including the police and other law-enforcement agencies to prevent and detect fraud (including fraudulent transactions) and criminal activity. These external agencies may check the information we give them against public and private databases and may keep a record of those checks to use in future security checks,
- if a claim is made, or could be made, against us we may pass personal information to our insurers,
- if we sell or buy any business or assets, we may reveal personal information about you to the prospective seller or buyer of that business or the assets,
- if we (or substantially all of our assets) are bought or taken over by another organisation, personal information we hold about customers will be one of the assets transferred,
- we may pass your personal information to others to keep to any legal obligation (including court orders), to enforce or apply our terms and conditions or other agreements we have with you, or to protect our rights, property and safety or those of our customers, employees or others.
- We will not share/sell your data with any third parties for remarketing purposes.

9. Transfers Outside of Europe

Your personal information may be transferred to, stored and processed in one or more countries outside the [European Economic Area](#) (EEA), including Guernsey. Guernsey's data-protection laws are similar to those in the EU and so these transfers are allowed. If we transfer your personal information to others outside of the EEA, we take extra steps in line with data-protection laws. We take all reasonable steps to make sure your personal information is adequately protected in line with the requirements of [The Law](#).

10. Our cookie policy.

We use cookies to improve how our website operates. You can find more information on our Cookie Policy within this website.

11. Analytics.

When you visit sarkelectricity.com we use a third-party service, [Google Analytics](#), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site in order to better understand how people use the website and to improve the site and the services offered. This information is only processed in a way that does not identify anyone. We do not make, and do not allow [Google](#) to make, any attempt to find out the identities of those visiting our website. For more information view our Cookie Policy. If we do collect personal data through our website, how this is processed and under what lawful processing condition depends on which part of the website is used and is listed above.

- Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

It should also be noted that we use remarketing features of Google to advertise our business across other websites. This means that Google (and other third parties) will show our ads on websites that you visit after visiting ours and that our ads will be shown because you have visited our website in the past. See also <https://www.trustarc.com/consumer-privacy/about-eu-cookie-directive/>.

12. How can I update or change my personal information?

You can update or change your personal information by contacting SEL directly.

13. What rights do I have?

You have certain rights under [The Law](#) including the right:

- to information for personal data collected from data subject (section 12)
- to data portability (section 14)
- to access (section 15)
- to object to processing for direct marketing purposes (section 17)
- to object to processing on grounds of public interest (section 18)
- to object to processing for historical or scientific purposes (section 19)
- to rectification (section 20)
- to erasure (section 21)
- to restriction of processing (section 22)
- not to be subject to decisions based on automated processing (section 24)

To ask for any of the above rights, please contact us directly.

We may request provision of additional information necessary to confirm your identity. The rights mentioned above do not always apply and we will review per request if we need to take action in order to comply with [The Law](#). We will provide information on the actions taken without undue delay and in any event within 28 calendar days of receipt of the request. That period may be extended by 56 calendar days where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within 28 days of receipt of your request, together with the reasons for the delay.

You have a right to complain to the [Data Protection Authority](#). They can investigate whether organisations are keeping to data-protection law.

14. Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

15. Updating our Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

16. Contact us

If you have any questions about this privacy policy, or you would like to change any of the preferences you have chosen then please contact us directly.

17. Links to other Websites

This notice does not cover any third-party websites reached via links on our website. You are advised to read the data collection statements on the other websites you visit.

18. Complaints and Appeals

Section 67 of [The Law](#) provides for a right to complain to the [Data Protection Authority](#). Sections 82 and 83 of [The Law](#) provides for rights of appeal.