
SPIRIT SOLAR LTD: PRIVACY POLICY

BACKGROUND:

Spirit Solar Ltd (trading as Spirit Energy) understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website (www.spiritenergy.co.uk ('Our Site')) and will only collect and use personal data in ways that are described here and in a manner that is consistent with your rights and our obligations under the law.

This policy applies to our use of any and all data collected by us in relation to your use of Our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"Our Site"	means this website, www.spiritenergy.co.uk ;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and
"We/Us/Our/we/us/our"	means Spirit Solar Ltd (a limited company registered in England under 07138647, whose registered address is 44 Portman Road, Reading RG30 1EA, which is also the company's main trading address).

2. Information About Us

- 2.1 Our Site is owned and operated by Spirit Solar Ltd, a limited company registered in England under 07138647, whose registered address is 44 Portman Road, Reading RG30 1EA, which is also its main trading address. Spirit Solar Ltd trades as Spirit Energy.
- 2.2 Our VAT number is 984 5319 81.
- 2.3 Our Data Protection Office is Erica Charles, who can be contacted by email on info@spiritenergy.co.uk, by telephone 0118 951 4490, and by post at Spirit Solar Ltd t/a Spirit Energy, 44 Portman Road, Reading RG30 1EA.

3. **Scope – What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (whether we provide those links or whether they are shared by other users).

We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- 4.1.1 the right to be informed about our collection and use of personal data;
- 4.1.2 the right of access to the personal data we hold about you (see section 12);
- 4.1.3 the right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 14);
- 4.1.4 the right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 14);
- 4.1.5 the right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 the right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 the right to object to us using your personal data for particular purposes; and
- 4.1.8 rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Some data will be collected automatically by Our Site (for further details, please see section 13 on our use of Cookies), other data will only be collected if you voluntarily submit it, for example, when filling in a form to receive a downloadable guide or to request a quote. Depending upon your use of Our Site, we may collect some or all of the following data:

- 5.1 name;
- 5.2 business/company name;

- 5.3 job title / profession;
- 5.4 contact information such as email addresses and telephone numbers;
- 5.5 address;
- 5.6 IP address;
- 5.7 a list of URLs starting with a referring site, your activity on Our Site;
- 5.8 content of any email sent by you or form filled in by you on Our Site.

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
- 6.2 We use your data to provide the best possible service to you. This includes:
 - 6.2.1 providing and managing your access to Our Site;
 - 6.2.2 personalising and tailoring your experience on Our Site;
 - 6.2.3 emailing you links to guides downloaded from Our Site by you (note that if you download a guide from Our Site, we may send you a series of follow up emails, for example a request to rate the guide, or an invitation to subscribe to a newsletter – you may opt-out of these emails at any time by clicking the links at the bottom of any such email;
 - 6.2.4 responding to communications from you;
 - 6.2.5 supplying our products and / or services to you and information about our products and services to you (please note that we require your personal data in order to enter into a contract with you);
 - 6.2.6 supplying personalised quotations to you in respect of our products and services;
 - 6.2.7 supplying you with email newsletters and / or blog updates that you have opted in to (you may unsubscribe or opt-out at any time by clicking the link on a newsletter or blog email that we send you);
 - 6.2.8 market research;
 - 6.2.9 analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.
- 6.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and / or telephone and / or text message and / or post with information, news and offers on our products and services. We will not, however pass your details on to others, sell your data, or send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and

2015.

- 6.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.
- 6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Unless you ask us to delete your personal data, data retention will be determined on the following bases:
 - 6.5.1 if we install a system for you, as a minimum we keep records (including the necessary personal data for the system owner) for a minimum of six years in order to comply with the Microgeneration Certification Scheme, however in order to offer on-going technical support, we will endeavour to keep records for the expected system life (which generally exceeds six years);
 - 6.5.2 if you opt-in to an email list or download a guide on our website, but do not purchase a system from us, your record will be reviewed annually and deleted if you have subsequently opted-out of communications and there is no other reason (such as dialogue to enter into a contract) for us to retain your personal data.

7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.
- 7.2 We may from time to time use third party customer relationship management software such that some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 7.3 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.

8. **Do We Share Your Data?**

- 8.1 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of services such as supply of scaffolding or structural engineering services, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.3 We may sometimes use third party data processors that are located outside of the European

Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

- 8.4 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

9. **What Happens If Our Business Changes Hands?**

- 9.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

10. **How Can You Control Your Data?**

- 10.1 When you submit information via Our Site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. **Your Right to Withhold Information**

- 11.1 You may access most of Our Site without providing any data at all. However, to use all features and functions available on Our Site and to access some downloads, you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict our use of Cookies. For more information, see section 13.

12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the Data Protection Act 1998, Please contact us for more details using the contact details below in section 14.

13. **Our Use of Cookies**

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First

party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

- 13.2** All Cookies used by and on Our Site are used in accordance with current UK and EU Cookie Law.
- 13.3** Before Cookies are placed on your computer or device, subject to section 13.4, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our site may not function fully or as intended.
- 13.4** Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser's settings,, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.5** The following are the main Cookies that may be placed on your computer or device:
 - 13.5.1 Cookie on form submission used to avoid duplicating contacts;
 - 13.5.2 Cookie to keep track of sessions and page views;
 - 13.5.3 Cookies to ensure user doesn't keep getting asked to accept Cookies and to test whether the visitor has support for Cookies enabled;
 - 13.5.4 Cookies to recognize visitors utilising the chat or messaging tools on Our Site to load conversation history.

- 13.6** Our Site uses analytics services, being a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the services offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.
- 13.7** The analytics service used by Our Site uses Cookies to gather the required information.
- 13.8** In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.9** You can choose to delete Cookies at any time however you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.10** It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact us by email at info@spiritenergy.co.uk, by telephone on 0118 951 4490 or by post at 44 Portman Road, Reading RG30 1EA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about. Please address your communication to Erica Charles.

15. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Last Reviewed: 19th January 2022

Next Review: 31st January 2023