

**Last Revision Date: 25 May 2018**

Premier LPG Limited ("**Premier**") is committed to your privacy and the protection of your personal information in accordance with General Data Protection Regulation 2016/679 (GDPR) ("**Data Privacy Laws**").

We collect and process Personal Information that is provided by you (as our customer, previous customer or prospective customer) or generated by you in your use of our services and purchase of our products.

Premier will, in most situations, be a data controller (rather than a data processor) under Data Privacy Laws. We therefore determine the purpose and means of processing your Personal Information and implements appropriate technical and organisational measures to ensure that the processing is undertaken in compliance with Data Privacy Laws.

This Privacy Notice explains what Personal Information you provide to us and how we use your Personal Information to provide our services and products to you. This Privacy Notice also summarises your rights to control how we use your Personal Information.

## **Your Personal Information**

Your Personal Information includes any information relating to you where you are identified or from which you are identifiable. We may collect and process the following Personal Information:

- your first name(s), middle name(s) and surname name;
- your email address(es);
- your contact telephone number(s);
- your delivery address (including postcode);
- your invoice address (if different to your delivery address);
- your date and place of birth;
- your customer account number; and/or
- your bank details (if applicable).

We may also collect other types of Personal Information from different sources, for example, information you provide to us when you open and modify your account, information you provide to us when you contact us via our website, information you provide to us to obtain services or products provided by us, information we collect about your use of our services, purchase of our products and provided by you in emails or telephone calls to us or third parties authorised by us and information we collect to process payments online.

Some of the Personal Information you provide to us may include health information or other sensitive or special categories of Personal Information. If you provide this information to us we will only use it if relevant to ensure you receive an appropriate level of service from us.

All your Personal Information, collected directly or indirectly, will be processed and protected in accordance with this Privacy Notice.

## **We collect some Personal Information with your consent via:**

- your completion of our documentation – in particular, our agreements, supplier switch notices / documentation and payment mandates;
- your use of our websites – notably, when submitting a query or request via the “Contact Us” messaging feature;
- our communications (by email, telephone or in writing) re customer care, accounting, engineering and or delivery services;
- Participation in competitions, contests or surveys.

We do not request and, so far as we are aware, collect Personal Information regarding minors under the age of 16.

## **Why do we collect your Personal Information?**

The legal basis for collecting and processing your Personal Information is to ensure that we can efficiently fulfill our pre-contractual and contractual obligations to you as set out in the terms and conditions of our agreement. We also collect your Personal Information to comply with other legal, regulatory and contractual obligations and to defend and establish our interests should legal claims and other disputes arise with customers and/or with third parties.

We only collect Personal Information that is adequate, pertinent and limited to what is necessary for the purposes for which it is processed. If your Personal Information is not provided, we will not be able to fulfil our obligations, satisfy your requests or provide you with the requested products and services.

## **We use your Personal Information for the following reasons:**

- to perform our obligations to provide products and services as set out in the terms and conditions of our agreement including but not limited to gas deliveries and tank maintenance;
- Offer you services that meet your needs
- Enable payment transactions to be processed;
- Facilitate the task of scheduling deliveries;
- Develop and analyse statistics to review our commercial and logistical activities;
- Keep you updated with products and services based on your preferences and with your consent;
- Comply with our legal and regulatory obligations and requirements;
- Manage any litigation with you or with a third party in which your Personal Information is involved;

## **What we do with your Personal Information**

We are permitted to process your Personal Information to comply with our legal and regulatory obligations and/or our contractual obligations to you to provide the products and services to you, to

manage your account with us and to manage any technical or safety issues or support requests that may arise.

We may also process your Personal Information in our legitimate interests or those of a third party, which include our requirements to use your Personal Information in litigation or for other legal purposes involving us and/or any of our affiliates.

Your Personal Information may be shared with third party subcontractors, advisors or agents engaged by us to fulfill certain services under our agreements. Third party recipients include: external advisors and auditors, banks, persons responsible for the maintenance and inspection of the gas infrastructure in situ at your premises; persons responsible for the maintenance of third party applications, software and storage services and in the event of a dispute, investigators, legal advisors and collection agencies and other parties to the dispute.

Such subcontractors or agents shall agree in writing to comply with the privacy and security standards described in this Privacy Notice. We do not allow any other third parties to have access to your Personal Information, except as required or permitted by applicable laws or compulsory legal processes or protect the rights, property or safety of us, or any of our affiliates, business partners, or customers or otherwise in our and/or our affiliates' legitimate business interests and in accordance with Data Privacy Laws.

We may share your Personal Information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of our business to that business entity.

We will not use your Personal Information for any additional purposes without your consent. You have the right to tell us that you do not want to be contacted by us for any additional purposes any time after you initially provide your consent.

In any instance where we need to share your Personal Information with third parties, we will restrict the nature and categories of Personal Information to that which is required to comply with our contractual obligations to you or our legal and/or regulatory requirements. We may de-identify your Personal Information to protect your privacy.

### **How we protect your Personal Information**

We take steps to ensure the protection of your Personal Information as from the design of our products, services, sites and applications. Transfers of your bank data are encrypted by the Secure Socket Layer (SSL) protocol. Our employees are aware of the restrictions on processing of Personal Information. We understand that storing data in a secure manner is essential. Accordingly, we store Personal Information and other data using appropriate physical, technical and administrative safeguards to secure data against foreseeable risks, such as unauthorized use, access, disclosure, destruction or modification. Although we make good faith efforts to store the information we collect in a secure operating environment that is not available to the public, we cannot guarantee complete security. Further, while we work to ensure the integrity and security of our network and systems, we

cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

We deal with third parties that respect privacy rights and we limit their access to only that Personal Information necessary to carry out their responsibilities. Information exchanges are carried out by secure protocols. To ensure a high level of security for your Personal Information, our sub-contractors are subject to controls and audits as required by Data Privacy Laws.

## **How long we retain your Personal Information**

We retain your Personal Information relating to the use of our services for the duration of the customer relationship and for the legally required period thereafter. After this period has expired, the Personal Information relating to your account and your use of the services will be deleted or de-identified in accordance with the Data Privacy Laws. Any Personal Information which you have provided to us for marketing purposes will be kept until you notify us that you no longer wish to receive this information.

## **Other services & products**

We would like to use your name and email address to inform you of our future or related services, offers and similar products. If you provide us with your consent to receive marketing communications, we will offer the right to unsubscribe in each electronic communication. This information is not shared with third parties and you can unsubscribe at any time by emailing [lpg@premierlpg.co.uk](mailto:lpg@premierlpg.co.uk).

## **Your rights**

You have additional rights relating to your Personal Information under the Data Privacy Laws.

Subject to certain conditions in accordance with the Data Privacy Laws, you may request: (i) access to your Personal Information; (ii) rectification of your existing Personal Information; (iii) erasure of your Personal Information, subject to other regulatory or contractual obligations; (iv) porting of your Personal Information (the right to portability allows you to obtain some of your data in an open, machine-readable format) where the data is processed on the ground of consent and by automated means; (v) objection to processing your Personal Information; or (vi) restriction of processing your Personal Information in order to verify its accuracy, object to its erasure or exercise or defend your legal rights.

If you exercise your right to request that we delete your Personal Information or restrict the processing of your Personal Information, you should be aware that this will compromise our ability to provide you with the services and products.

If you wish to raise a complaint on how we have handled your Personal Information, please email [lpg@premierlpg.co.uk](mailto:lpg@premierlpg.co.uk). We will investigate the matter and respond to you promptly.

## CUSTOMER PRIVACY POLICY



If you have any questions about this Privacy Notice or about our handling of your Personal Information, please email [lpg@premierlpg.co.uk](mailto:lpg@premierlpg.co.uk). We will endeavour to respond fully and promptly.

Please note that this Privacy Notice may be updated from time to time. Your continued use of our services and/or purchase of our products indicate your acknowledgment of the updated Privacy Notice applicable at that time.