

## **PRIVACY NOTICE**

**Curv360 is a part of the Project Better Energy Limited group of companies and is a controller of any personal data you provide. We respect your data and your privacy is important to us.**

**This Privacy Notice explains what personal data we collect and how it is used. This notice also explains what rights you have over your personal data and how you can use those rights.**

**You have the right to object to some of the processing which Project Better Energy carries out. More information about your rights and how to exercise these is set out in the “Your rights” section of this notice.**

**Project Better Energy Limited’s registered office is Witan Gate House, 500 – 600 Witan Gate West, Milton Keynes, Buckinghamshire, MK9 1SH**

### **Summary of how we use your data and your rights**

**We use your data to provide and improve our products and services, including for marketing, research, feedback and enquiries, and for safety and security purposes.**

**We will use your data to comply with laws and regulations. We may use your data to prevent and detect crime, such as fraud.**

**You have the right to object to some of the processing Project Better Energy carries out. More information about your rights and how to exercise these is set out in the “Your rights” section of this notice.**

**When you give consent, you are able to withdraw that consent at any time, for instance by emailing [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com)**

**You can also email [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com) to exercise any other data rights, such as obtaining a copy of your data, correcting, deleting or restricting how we use your data. Please see “Your rights” for more information.**

**You can unsubscribe from marketing communications at any time. To opt out of marketing select “unsubscribe” in emails, or email [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com)**

**Our websites and app use cookies and similar technologies to improve functionality, recognise you and to customise your experience. You can reject and block cookies in your browser settings. Please see our cookie notice for more information.**

### **Information we collect from you**

**We collect information when you enquire, purchase something or use our services. This includes using our websites or apps or corresponding with us.**

#### **In particular:**

- We keep information you give us directly such as contact details (including name, email, address and telephone number), comments, date of birth, gender, region, feedback, marketing opinions and competition entries.**
- If you engage with us online via our websites or app our cookies and similar technologies may capture your IP address, your location, and record how you use the site or app to help improve it and improve your user experience, where your browser settings or permission allows for this.**

- **If you post information online about us or provide feedback, we may keep a record.**
- **If you contact us directly and complain or give feedback, receive compensation, or enter a competition, we will record details and all related information such as emails, letters and phone calls.**
- **We use CCTV around our sites for the prevention and detection of crime and for safety and security reasons.**

### **Information we receive from third parties**

**Although we collect most of our data from our own marketing platforms we do occasionally purchase leads from third parties. All of our data providers ensure the data collected is compliant under General Data Protection regulations, is fully opted in to be contacted by businesses with the Project Better Energy Ltd Group.**

### **How we use information and the legal basis**

**We are allowed to use your data only if we have a proper reason to do so such as:**

**To fulfil a contract we have with you;**

- **When it is in our legitimate interest;**
- **When you consent to it; or**
- **To comply with the law.**

**A legitimate interest is when we have a business or commercial reason to use your data. This involves us making an assessment of when we can rely on our legitimate interests.**

**We have set out below how and why we may use your personal information and the legal basis we rely on. This is also where we tell you what our legitimate interests are.**

**When you buy something from us, enter a competition we run, we use your information to fulfil our contract with you.**

**We take information to communicate with you, check your identity, take payment, and provide products and services.**

**To run our business and pursue our legitimate interests, we use your information.**

**Our legitimate interests include keeping our records up to date, fulfilling our legal, compliance and contractual duties, working out which of our products and services may interest you, improving our site and apps, and services, developing new products and services, and telling you about them and conducting market research.**

**Further details of our legitimate interests:**

**To run and promote our business, we use your information:**

**To provide and improve our products and services as well as to respond to you if you contact us.**

**To record call centre communications, including incoming and outgoing calls and emails, for staff training, quality improvement purposes and establishing facts.**

**When we monitor our websites, social media platforms such as Facebook and Twitter and online services including our mobile app and responses to email marketing. If you post comments online or in other media we may capture this information, contact you, and use it to improve our products and services.**

**When we monitor our websites, social media platforms such as Facebook and Twitter and online services including our mobile app and responses to email marketing. If you post comments online or in other media we may capture this information, contact you, and use it to improve our products and services.**

**To understand you better as a customer by analysing your transactions and other information you provide to us or which we learn through your interactions with us.**

**To send you emails including offers tailored to your perceived preferences we record which emails seem to be of interest to you.**

**To contact you where you provide us with market research feedback or pass this data to a third-party business partner of ours for panel market research analysis.**

**To prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, including where we are required to do so by law we may:**

**Use other organisations to check the validity of the credit or debit card details you use to pay (for further details see “Data sharing” below).**

**To comply with law, assess and uphold legal or contractual rights and claims, and for monitoring, auditing and training on compliance matters:**

**We keep records and pass your data to companies within the Project Better Energy Group and our insurers when necessary (for further details see Data sharing below).**

**We monitor, and record call centre communications, including incoming and outgoing calls and emails.**

**We may verify your identity.**

**We may, if you give us consent**

**Send you electronic marketing, including promotions and offers, in relation to our products and services.**

**Use cookies or similar technologies on the website, app and in marketing emails, including analytic cookies. For more details on our use of such technologies, click here to see our Cookie notice.**

**The settings on your device, send you push notifications through the app.**

**Use data for other purposes where we explain that purpose when we ask for your consent.**

**When you give consent, you are able to withdraw that consent at any time by contacting us, for instance by emailing [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com) if you do so we can only continue to use your data if another legal basis applies, such as when we're required to do something by law.**

**Nevertheless, you have an absolute right to opt-out of direct marketing, including profiling for direct marketing purposes, at any time. You can opt out of marketing by selecting "unsubscribe" in emails or by emailing [datacontroller@projectbetterenergy.com](mailto:datacontroller@projectbetterenergy.com)**

**When the law requires us to process your data we will do so. This can include**

- **Legal, compliance, regulatory and investigative purposes, including for government agencies and law enforcement.**
- **When you exercise your rights under data protection legislation, including when you ask to subscribe or unsubscribe from our marketing communications.**

### **Data sharing**

**The Project Better Energy Limited group of companies and shares data only within the Project Better Energy Limited group that provides support, advisory, IT, safety and security, including CCTV, and other services.**

**Included in our group of companies are**

- **Project Better Energy UK**
- **Project Solar UK**
- **ECO Wurx**
- **Zanussi Solar**
- **Zanussi Boilers**
- **Zanussi AR**
- **Duracell Battery Storage Systems**
- **CÜRV**

- **CÜRV360**
- **Project Air Source**

**For some activities we use third party service providers to assist in the carrying out of our contractual duties. All third parties are thoroughly vetted and any data passed is GDPR compliant.**

**We do not pass your data to any external company for marketing.**

**If our business is to be integrated with another business or sold, your details would be shared with our advisers and any prospective purchaser's advisers. Your information will be passed to the new owners and you would be notified.**

**Personal data may be shared with government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim.**

#### **International transfers**

**Sometimes we may need to send or store your data outside of the European Economic Area (the EU plus Occasionally we pass data outside the EU to assist in the provision of our contracts and services. While countries outside the EEA do not always have strong data protection laws, we require all services providers to process your information in a secure manner and in accordance with EU law on data protection. We utilise standard means under EU law to legitimise data transfers outside the EEA and will always inform you of the transfer.**

#### **Cookies and similar technologies**

**Our website, apps and marketing emails use cookies and similar technology. Full information is in our cookie notice. This includes information on how to adjust your browser settings to accept or reject cookies.**

## **Data retention**

**We keep your data to enable us to fulfil our contract with you or to provide services, whilst you are an active customer, where required by law or to protect legal rights.**

**We always look to keep your data for the minimum time in line with data protection principles and our processes. For example, we keep:**

**Customer feedback and correspondence with our customer services teams for up to the length of the warranties issued (up to 25 years), depending on the nature of the interaction and any applicable law, such as health and safety. This enables us to respond to any questions or complaints.**

**Information to maintain records according to rules that apply to us.**

**If you unsubscribe from marketing communications we keep a record of this request indefinitely to ensure we do not send you direct marketing again.**

**We may keep your data for longer if we cannot delete it for legal, regulatory or technical reasons.**

## **Your rights**

**You have rights over your personal data.**

**You can:**

- **ask for a copy of your information;**
- **ask for information to be corrected;**
- **ask for information to be erased or deleted;**
- **ask for us to limit or restrict processing;**
- **object to us processing your data, in particular where we use the data for direct marketing, including profiling for direct marketing purposes. The right to object does not apply if we must process the data to meet a contractual or legal requirement;**
- **ask us to send you a copy in a structured digital format or ask for us to send it to another party.**
- **Some rights, however, may be limited. We may be obliged by law or regulation to keep information. We must respect other people’s privacy as well, which means we may need to redact or remove information where it includes personal data about someone else, even if it is connected to your data. On occasion there may be a compelling legitimate interest to keep processing data.**

**If you want a copy of your data, to object to how we use your data, or ask us to delete it or restrict how we use it or, please see ‘Contact details’ below. To process a request from you, we may need to confirm your identity to ensure we’re accessing the right data.**

**You have a right to complain to an EU data protection authority. This can be where you live, work or where the matter occurred. In the UK, the authority is the Information Commissioner’s Office (the “ICO”).**

**Contact details**

To exercise any of your rights or to withdraw consent you can mail: [datacontroller@projectbetterenergy.com](mailto:controller@projectbetterenergy.com)

For any queries relating to data protection please contact [datacontroller@projectbetterenergy.com](mailto:controller@projectbetterenergy.com)

or by writing to the Data Controller,

Witan Gate House,  
500 – 600 Witan Gate West,  
Milton Keynes,  
Buckinghamshire,  
MK9 1SH.

If we make any changes or updates to this notice we will communicate these.