

**NEXT GENERATION
NETWORKS**

**Electric Nation
Data Protection Strategy**



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1 Introduction

Electric Nation is a Network Innovation Allowance research and development project (the “Project”). It is anticipated that the number of Plug in Vehicles (PIVs – Battery Electric Vehicles and Plug in Hybrid Electric Vehicles) will increase significantly over the coming years. This will present a challenge to the GB Distribution Network Operators (DNOs). The Project will develop a strategy to help DNOs minimise this impact.

The Project will be directed by Western Power Distribution (“WPD”) and delivered by a partnership of EA Technology and Fleetdrive Management Limited (trading as “DriveElectric”). EA Technology will be responsible for project management and management of the PIV demand control trial. DriveElectric will be responsible for recruitment of customer trial volunteers and all practical aspects of operating the customer trial. Most importantly, from a data protection perspective, DriveElectric will supply vehicle related trial data whilst EA Technology will use this data in an anonymised format to develop a PIV demand control algorithm in conjunction with Greenflux and CrowdCharge. EA Technology will be responsible for the analysis and reporting of all trial data.

The Project is a mass market trial of PIV demand control services. This trial will inform the development of an LV Network Assessment Tool and functional specification and commercial framework for PIV Demand Control. Together these will enable DNOs to adopt and implement PIV demand Control services effectively and efficiently as the PIV market penetration grows. Up to 700 new PIV drivers will be recruited to the project from WPD licence areas in order to provide the project with statistically significant data. Project data will be used to develop a control algorithm and research customer behaviours relating to car charging and journey planning. Customer acceptance of charging restrictions will be assessed by Impact Utilities, a market research company. The market research will be used to assess the acceptability of the technical solution to EV drivers if it was subject to a mass roll out.

DriveElectric will act as ‘Data Controller’ for the Project. DriveElectric has 18 years’ experience in managing customer data through its car lease business and experience in implementing Data Protection procedures across project partners and suppliers.

This data protection strategy covers key questions surrounding how the Project will handle customer and technical data from the initial data capture until the cessation of project activities to the point at which data is destroyed. The strategy also outlines the data security mechanisms being implemented to ensure the security of personal data. These are in accordance with requirements of the General Data Protection Regulation 2018.

If any aspects of the Data Protection Strategy change during the Project’s lifecycle, a revised version of this document will be submitted to Ofgem for approval.

2 Key Questions Answered

The Project will collect customer contact information, socio-economic data, car usage data and project feedback as well as electrical usage for PIV charging and network information.

This document describes the data protection measures for customer data to be undertaken by DriveElectric and Project Partners or subcontractors contracted to collect, or to perform analytics and modelling using the data.

Diagram a) in section 4 illustrates the overall data flow for the project.

2.1 What personal data will be collected for the purposes of the Project?

The Project will collect name, address, telephone number, and email address during recruitment. Impact Utilities, who have been commissioned to conduct customer research for the project, collect data such as household income, participant social grade and fuel poor status that could be classified as special category data (previously defined as sensitive personal data¹ by the Information Commissioners Office).

The Project will also collect a number of parameters from participants' vehicles including vehicle state of charge, journey characteristics, location of the vehicle at a particular time, direction of travel and car charging patterns, as well as electrical parameters pertaining to the charging of the electric vehicles such as Voltage and Current and overall energy usage of the participants home.

For marketing purposes, customers may be asked to provide quotes for project materials, or to be photographed with their PIVs in their local area or street, by Project Partners. In this instance, customers will be asked for permission prior to any photographs being taken and their consent will be recorded (via a separate consent form). Any photographs used for marketing purposes will only show basic information; only first names and local town/city will be presented with the photograph. The photographs taken will only be used to promote the Project as agreed with the customer at the time of giving consent.

Behavioural information and participant feedback will be collected via a number of different methods, depending on which the participant prefers. This could include online or written weekly surveys, face-to-face, telephone or email interviews, and focus groups. Residential information will be collected using simple questionnaires.

DriveElectric may collect financial data to allow participants to be part of an incentive scheme for payment purposes only. If this is required, this data will be collected via a questionnaire.

The personal non-financial data required in the Project will be collected by DriveElectric, Impact Utilities who have been appointed the customer survey sub-contractor for the Project, or potentially the Mobile App.

¹ For definition of 'sensitive personal data' see:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/>

2.2 How will the personal data be used?

The personal non-financial data will be used for technical and socio-economic modelling to understand how the technical solution can be used, the settings required and the benefit that can be achieved. Where possible, the data will be used in an anonymous format. Personal data will only be shared for modelling purposes with stakeholders who are data controllers.

Personal data and special category data will be used to research and understand the acceptability of the technical solution to project participants, and to extrapolate whether the solution would be accepted by EV drivers if it were to be used beyond the scope of the project. The data will be analysed in an anonymous format. The data will only be shared for modelling purposes with stakeholders who are data controllers and only shared in an anonymous format.

Necessary details such as the name and address of trial participants will be passed to a sub-contractor/s appointed by DriveElectric to provide charge point surveying, installation and maintenance services. These sub-contractors would act as data controllers in accordance with requirements of the General Data Protection Regulation 2018. As part of the installation process the installer will inform the relevant DNO that a charging point is being fitted as required by the IET's Code of Practice on Electric Vehicle Charging Equipment Installation (this is a process outside the boundaries of the Project).

The address and details of where each charging point is installed will be recorded in an asset management database. This asset management database will be used for maintenance purposes and to allow the speedy resolution of any faults. This will be held by DriveElectric.

WPD will be informed of the addresses where any charge point is installed for information purposes. This would only include the data that they would receive from the notification form as part of the installation process in line with their role as a DNO, in order for them to check that the electric vehicle charge point notifications have been sent to the DNO by the charging point installer. Where a customer is domiciled outside of WPD's licence area, the relevant DNO will be issued with the same information.

Data will also be collected from the PIVs via a Demand Control System ("DCS"). This data is collected from all customers (with their permission). Individuals cannot be identified from the data, therefore it is non-personal information. The data will be stored in accordance with DCS data protection and encryption protocols to which the customers have already agreed. Data will be downloaded as a batch process, the frequency of which will be determined to balance the need to check the data is correctly recorded without being burdensome on the DCS. Data will be transferred in accordance with the protection measures outlined in this document.

Non-personal data required in the Project will be collected by Lucy Gridkey Electronics.

Personal data may be collected by the PIV demand control service providers (Greenflux and CrowdCharge) ahead of inclusion within the project. If the PIV demand control service providers plan or intend to gather personal information from customers then we will require them to register with the Information Commissioners Office as data controllers and comply

with the General Data Protection Regulations 2018. As such a flow of information may come from the service provider to DriveElectric via a secure API.

Participants may be offered added services such as alerts for vehicles left uncharged or forecasts of their energy/charging requirements.

2.3 How will consent for use of the personal data be obtained?

All customers participating in the Project will give their consent in a form which will be similar to that included in Appendix A. This will form part of the document pack sent to participants. The Project's Customer Engagement and Recruitment Plan details the full engagement strategy. The consent form will provide participants permission for the information obtained from them to be used for research purposes and analysis by the project commensurate with the aims and outcomes of the project as detailed in the form and on the project website.

DriveElectric will write into contracts with Project Partners and contractors that data shared with Project Partners as part of the Project, and consented to by customers, will not be used for any other purposes than those agreed with the customer for this Project. For example, as a default, Project Partners will not use contact information for their own marketing purposes. DriveElectric will control access to non-financial data and only allow Project Partners to have access to the information that they require to fulfil their tasks within the Project.

Customers will be asked for permission for the Project Partners to take photographs of them. Customers' consent will be recorded in a separate consent form which will state how the photograph will be stored, for what purposes it will be used, and what other personal information will be presented with the photograph (i.e. first name and local town/city only). Customers will be able to withdraw their consent for any photograph of them to be used in marketing material, on the condition that they notify DriveElectric in writing before marketing material is issued for publication.

Project Partners will ask customers' permission to include agreed personal information in marketing materials (e.g. press releases). Marketing material including personal information will not be signed off for publication by EA Technology unless permission has been granted. Customers will be able to withdraw their consent for their personal information to be used in marketing material, on the condition that they notify DriveElectric in writing before marketing material is signed off. All marketing materials must be signed off by EA Technology prior to dissemination or publication.

2.4 What information will be provided to the customer prior to consent being sought?

All customers seeking participation will be provided with details and purposes of the Project including:

- Future predictions for PIVs and their impact on networks and the need for the Project
- Objectives of the Project
- The identities of the Project Partners

- Funding for the Project
- A brief summary of how they can be involved in the Project, including information about Impact Utilities, their obligations as a trial customer, and the timescales of the Project.

The full engagement strategy is given in the Customer Engagement Plan.

2.5 If Priority Services Register Customers are included in the Project, how will their personal data be obtained?

If Priority service register customers volunteer for the Project and are eligible (as with any volunteer), their personal data will either be collected automatically or in a manner appropriate to their needs. For example, if Impact Utilities is collecting customer feedback they will use telephone calls or a face-to-face conversation if this is easier than internet.

2.6 Who owns the personal data? How long will the personal data be retained?

DriveElectric will be the data controller for all data for the research purposes as it will determine the purposes for which and the manner in which the personal data are processed. This also removes any need for personal data to be moved between parties unnecessarily, which could inherently weaken the protection of customer data. Project suppliers (for example Lucy Gridkey Electric) will also act as holder for non-personal information including electrical parameters which are not attributable to individual households.

The customer will own the personal data that relates to them and have rights under the General Data Protection Regulation 2018 including, but not limited to requesting access to their personal data and request amendments (in writing or orally if they cannot make a request in writing) to inaccuracies at any time.

As part of the Project's close down procedure, all personal data will be anonymised and the original personal data will be permanently deleted. Any personal financial data necessary for the incentive scheme (held by DriveElectric in their CRM database) will be retained on a secure server for the duration of the trial and permanently destroyed afterwards.

Following the Project's close-down, Project Partners may only retain anonymised results of their analysis.

DriveElectric is the sole Project Partner who has an absolute need to access customers' financial data in order to manage the trial incentive scheme; for this reason it is appropriate that DriveElectric will also be the data controller for all personal financial data processed in relation to the Project. This eliminates any need for movement of financial data from one party to another. Personal financial data will be retained on a secure server for the duration of the trial and permanently destroyed afterwards.

2.7 How will data be securely transmitted?

Data transfer to and from the secure database, the research (non-DriveElectric) database and between Project Partners must use the following security:

- Wherever possible customers will be referred to via a unique, ID number rather than use personal details. The CRM database will provide access via the Unique ID to personal details only by secure password access and only to the users who are defined as authorised to access this information.
- All spreadsheets will be encrypted, and password protected with the password transferred separately to the spreadsheet; only anonymised data will be handled in this way; they will only be passed between project partners and sub-contractors as a measure of last resort and via secure password protected online storage
- All transfer of data will be via secure password protected online storage e.g. SharePoint or similar
- Data will be transferred using a secure website accessed using https or transmitted using secure file transfer (either FTPS or SFTP)
- Personal data will be sent separately to other data (e.g. demand and voltage data should be sent separately to names)
- In all cases data will not be sent by email or printed from other non-protected format
- Where email of a spreadsheet is the only way data can be transferred it must be encrypted and password protected
- Passwords be transmitted separately to spreadsheets

With respect to data transmitted from substations by Lucy GridKey, individuals will not be identifiable. The following checks will be taken to ensure that the data has not been tampered with:

1. An 'Open Trust' model is employed internally within the software meaning that information is able to pass freely. This type of model is secure for data and control handling of software implemented within a single micro-processor. It can also be used for when two or more micro-processors are contained within the same physical unit. Anti-tamper facilities will be added to physical units if required.
2. Encryption will be employed between physical devices if they are in different locations or are vulnerable to attack in one place. Encrypting and decrypting will be performed using fixed known keys or patterns stored in each device.
3. A 'Closed' Architecture is employed for the system. This means that each network is given a unique code and nodes are set up only to join that node. It also means that there is a unique way of identifying the devices on the network.

The following outlines the security of the equipment and how it does not compromise the secure control of the network or the data.

2.8 How will data be stored securely?

All personal data and non-personal data, with the exception of financial and credit rating information, will be stored on a central database. Personal details (Names, addresses, other contact details) required for the project will be held on the DriveElectric Customer Relationship Manager (CRM) database. Technical data (car usage information, electrical parameters, network information) will be stored on the DriveElectric Application Interface

(API) database. Project Partners will be responsible for storing data to secure databases which will be hosted within the European Union with the following security measures:

- DriveElectric will manage the databases and control access and visibility of data sets to each of the Project Partners
- DriveElectric will also manage permissions on the databases, allowing Project Partner users to have access only to fields appropriate to them. Permissions will be controlled by either assigning Windows based or SQL based authentication or a similar level of security
- The servers will reject communications from unauthorised devices
- The databases will use non-standard names (security through obscurity)
- Project partners downloading data or accessing data for analysis and modelling purposes (other than Impact Utilities) will only be able to access data in an anonymised format (i.e. no personal data)

Personal data will not be stored on any portable device e.g. mobile 'phone or tablet used to gather registration detail by the PIV data control service providers. This data will be transmitted directly to the DriveElectric CM database and destroyed from the device once successfully transmitted. Identification of customers, their cars and their homes within the PIV demand control system and applications will be by code and thus anonymised.

Impact Utilities have been commissioned to carry out consumer research for the project. They are suitably qualified and registered with the Information Commissioner's Office at a 'Data Controller' under the General Data Protection Regulation 2018. They are provided with necessary data (email addresses, first and last names, other contact details) from the DriveElectric database. This data is inputted into a separate database that allows questionnaires to be programmed appropriately as required, and administered at the correct times, to the correct participants throughout the trial period. Impact Utilities will have access to this database; no other Project Partners or suppliers will be granted access. Therefore, Impact Utilities will be responsible for ensuring that the necessary security measures are undertaken as specified by the General Data Protection Regulation 2018. and the Information Commissioner's Office.

As data controller of customers' financial data DriveElectric will employ the following security measures. DriveElectric is registered with the Information Commissioners Office for Data handling (Registration no. Z8537104). DriveElectric is audited annually by an industry body, the British Vehicle Rental and Leasing Association to check on procedures used to deal with customers. Procedures include the following steps to ensure security of data especially in reference to financial applications:

- Use minimal paper copies of applications and where these are generated they will be shredded once completed
- Any scanned copies are securely archived on DriveElectric's password protected server and only emailed to or directly uploaded onto secure bank systems

- All staff have data protection and anti-money laundering training as part of FCA requirements
 - No disclosure of account details unless caller can be identified
 - Appropriate checks made on identity
 - Being aware of possible fraudulent applications.

Data may be collected from customers and recorded on paper (e.g. face to face interviews or telephone conversations). For this type of information, the Project Partners must follow the security measures listed below:

- Avoid recording personal data with other recorded data as much as possible, e.g. recordings of interviews labelled by number rather than names, and records identifying names to numbers kept separately
- Keep laptops password protected and attended at all times
- Encrypt files containing personal data
- Keep paper copies of notes attended at all times
- Upload securely to the central server as soon as practically possible and destroy paper copies generated prior to the upload when no longer in use.

Network Security:

A firewall enforces access policies such as what Data Services are allowed to be accessed by the network users.

During analysis Project Partners may store information locally, and for the research element of the Project, on a separate (DriveElectric) database provided by a specialised survey software provider. The following measures will be taken:

- Avoid storing personal records with other data as much as possible (e.g. use person 1, person 2 or other non-identifiable labelling systems).
- All computers must be password protected and where relevant, software programmes will also be password protected.
- Encrypt files with personal data.
- Analysis should be only undertaken in secure premises with controlled access.

2.9 How will data or analysis be published?

Results, data or analysis will be published in an anonymous format and will only be published with the permission of DriveElectric and other collaborative partners. All results, data and analysis published by the Project will be aggregated. Location information will be limited to a town/district. Harm tests will be done on behavioural data to ensure that people cannot be identified from publications unless an individual has given express permission for their details to be made available, for example in a case study or newsletter.

Project learning will be disseminated via individual project partners and suppliers GDPR compliant mailing lists in regular project newsletters.

3 Data Collection and Storage Summary Table

The data required in the Project will be collected by:

- DriveElectric
- GreenFlux
- CrowdCharge
- Lucy Gridkey Electric
- Impact Utilities

The table below gives the list of data and who will be collecting, transmitting, storing and using it. If any other Project Partner or subcontractor collects or uses data they must do so in accordance with this strategy and with permission from DriveElectric.

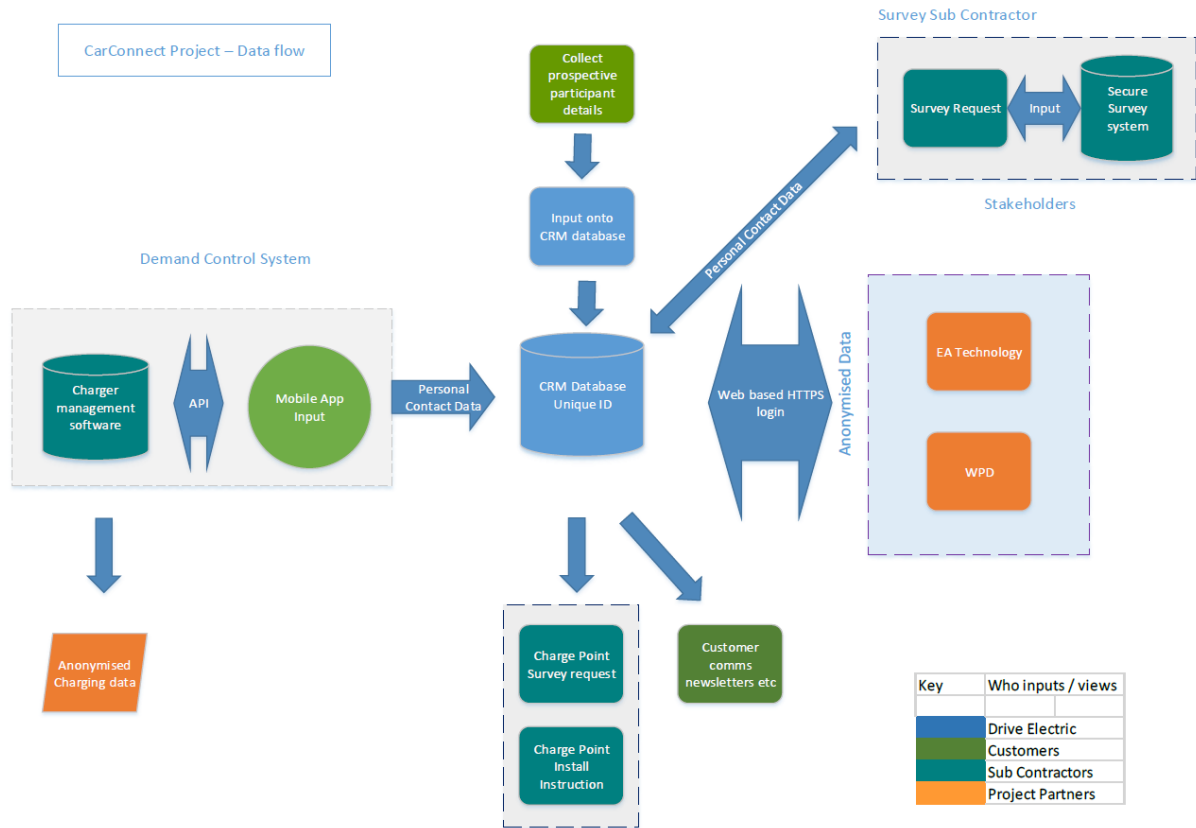
Data	Who collects the data	Where/how is the data recorded	Who transmits the data	Where is the data stored	Who will use the data
Contact details	DriveElectric	DriveElectric	DriveElectric	DriveElectric CM database	DriveElectric Impact Utilities Charge point installation / maintenance contractors
Driving habits	Greenflux CrowdCharge	DriveElectric API database	PIV provider	DriveElectric API database	EA Technology Greenflux CrowdCharge
Socio-economic data	Impact Utilities	Impact Utilities database	Impact Utilities	Impact Utilities database	Impact Utilities EA Technology
Project Feedback	DriveElectric Impact Utilities	DriveElectric database Impact Utilities database	Impact Utilities	DriveElectric CM database	DriveElectric EA Technology Impact Utilities
Photos	DriveElectric EA Technology	Secure project SharePoint site	EA Technology	Secure project SharePoint site	EA Technology
Financial Data	DriveElectric	DriveElectric	Data will not be transmitted	Central DriveElectric database	DriveElectric

Table 1: Indicative structure of data collection and use for Electric Nation

4 Diagrams: Electric Nation Data Flow and Management

4.1 Data flow

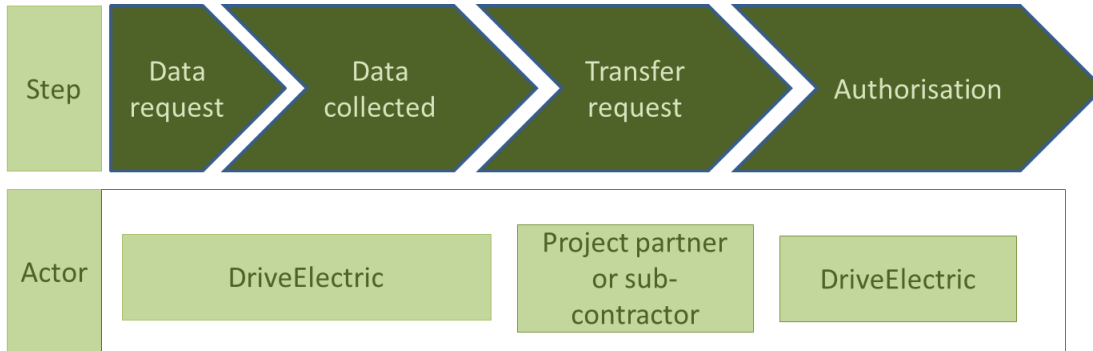
The following diagrams illustrate the data flow for this Project.



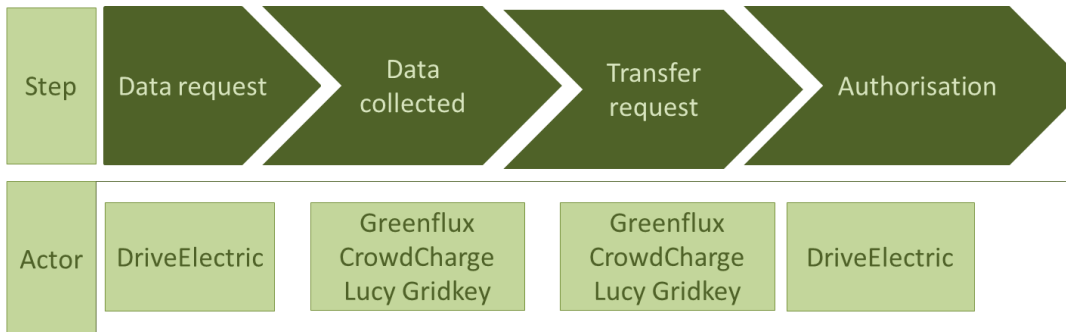
DriveElectric hold the right to perform an audit on the data protection measures Project Partners or contractors use when collecting or handling data at any time throughout the Project.

4.2 Data collection and upload

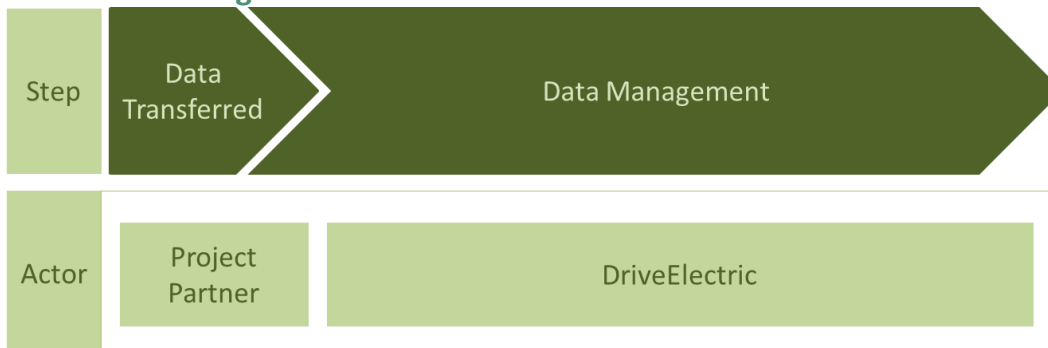
Personal Data – DriveElectric CRM database



Technical Data

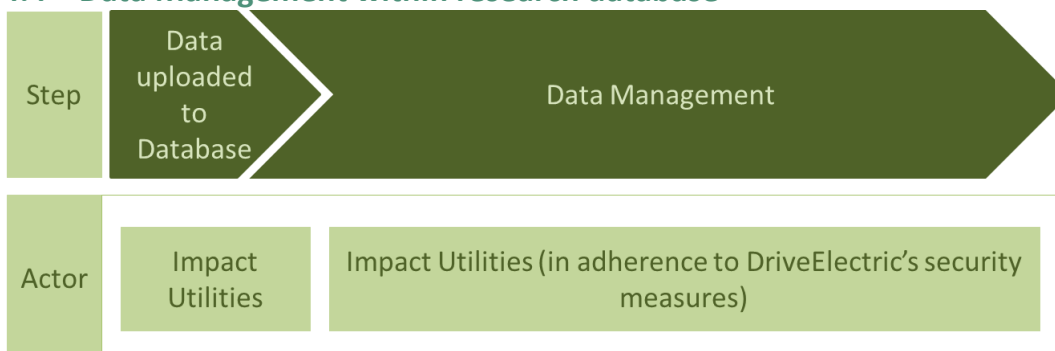


4.3 Data management within DriveElectric Database



Once data is transferred to DriveElectric’s secure database, DriveElectric is responsible for the security of the data shared and who has access to it.

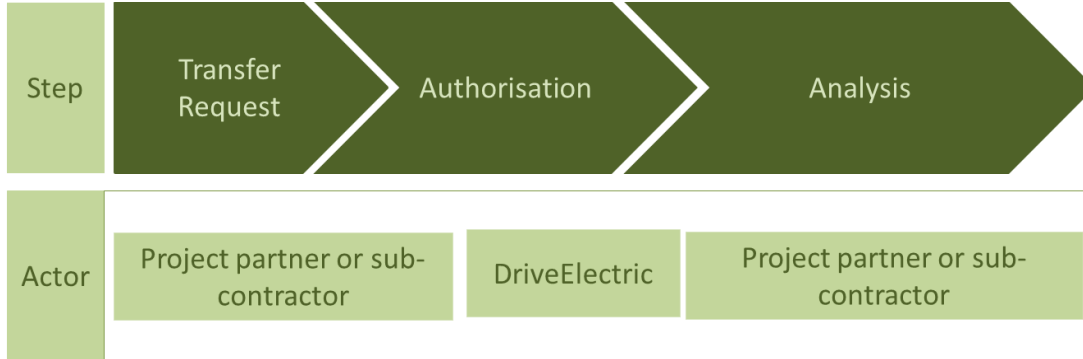
4.4 Data Management within research database



Once data is requested and uploaded into the specialised survey software and research database, Impact Utilities will be responsible for management of this data. Impact Utilities

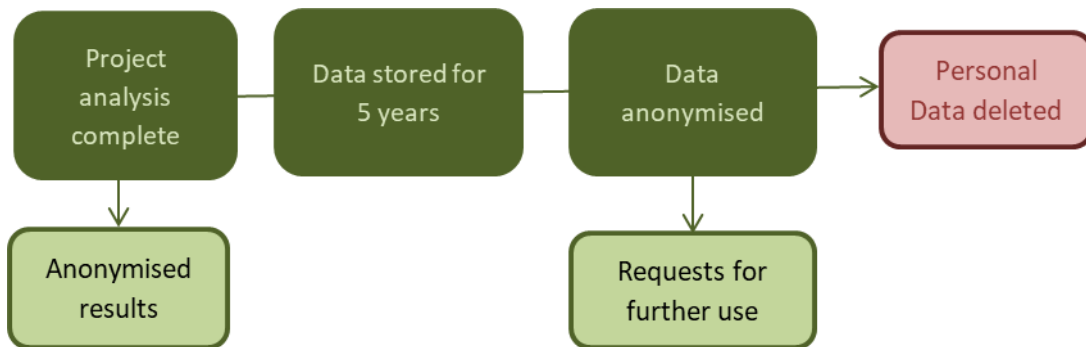
will manage this data through adhering to DriveElectric’s security measures as outlined within this document.

4.5 Data download / analysis



Project Partners will have access to the parts of the database relevant to the work they are undertaking within the Project and will be unable to access any area of the dataset not required for the role they hold within the Project.

4.6 Data anonymisation and / or destruction phase



Should any of the Project Partners or in particular Impact Utilities or participants wish to publish any of the results from this Project, they will be obliged to share the content to be published (results and accompanying analysis) with DriveElectric in advance of publication, to obtain authorisation.

Appendix A – Draft Customer Consent Form Wording

Expression of interest to participate in the Electric Nation trial research

This expression of interest form confirms my commitment to take part in the Electric Nation project, that I will participate in associated research, and that I agree to my data being used for the purposes of the Electric Nation project.

By signing this form I agree to this document being used for project reporting purposes by DriveElectric as evidence of my commitment to participate in the Electric Nation trial.

The suitability of my property needs to be assessed for the charge point installation. I understand that I am required to complete a survey along with photos to support this.

I understand that by participating in this project, and as the main user of the smart charger, I am obliged to participate in research carried out by Impact Research. I understand that I am required to complete up to eight surveys which will be issued to me over the duration of the project by Impact Research. These surveys will be online and will take no more than ten minutes to complete, per survey. I also understand that I will be contacted during the trial to take part in one face-to-face piece of research. This may be either an interview, or a focus or discussion group.

Impact Research is particularly interested in the feedback of main users of the smart charger. I confirm that I am the main user of the smart charger; other users of the smart charger in my household have also signed this document and agree to take part in eth surveys as detailed above.

COLLABORATION PARTNERS

Electric Nation is the customer-facing brand of CarConnect, a Western Power Distribution (WPD) and Network Innovation Allowance funded project. WPD's collaboration partners in the project are EA Technology, DriveElectric, Lucy Electric Gridkey and TRL.

I understand and consent to data being collected via input to a mobile device app and via a telematics device fitted to my vehicle.

I understand that if I leave the project before the end date there may be a penalty up to a maximum of £150.

By signing this expression of interest form, I confirm that I have read, understood and agree to the Data Protection Strategy and Privacy Agreement as detailed here:

www.electriconation.org.uk. I agree to Fleetdrive Management Ltd t/a Drive Electric processing the data I provide as part of this research. Any data published will be in anonymised (aggregated) format - please see 'Use of my data' below.

Use of my data

I confirm that I understand that the Electric Nation team is required to provide a final report to Western Power Distribution (the project funder) which will later be published in the public domain. I understand that I have the right to remain anonymous and confirm my agreement for the data I provide as part of this research to be used in an anonymised (aggregated) form in this report.

By placing an Order under the OLEV Homecharge Grant Scheme I consent that my personal data (name, address, telephone number and vehicle details) may be passed on to:

1. Any Government Department or Agency for the purposes of administering/auditing the Subsidy under the OLEV Homecharge Grant Scheme, who will process and use my details in accordance with the General Data Protection Regulation 2018.
2. Fleetdrive Management Limited t/a Drive Electric for the purpose of administering the PiCG Scheme and providing you with agreed goods and services.
3. Fleetdrive Management Limited will also disclose this information to appointed installers for provision of the charging equipment.

In addition, by signing this form, I agree to being contacted with Electric Nation-related information from the project team.

If you have any questions regarding the enclosed please contact the DriveElectric team on 0300 300 1050.

Please now complete the details overleaf and sign to confirm your agreement to the above.

Please could you email a scanned copy or photograph of your electricity bill so we can check your MPAN number and as proof of address.

Title		House number / name	
Initials		Street/ road name	
Surname		Locality	
Contact number		Town/ City	
Email address		Postcode	
Make			
Model			
VIN (Vehicle identification Number) If known			
Is your vehicle a Company car? If so what is the delivery date of the vehicle to you?			
Battery capacity			
Home charger rate		3.3kw	7kw

Project Commitment (please tick to confirm statements)

I have off-street parking	
I have space and electrical capacity for a smart charging point to be installed at their home address	
I am new or existing EV owner / driver	
I consent to using my own EV for the purposes of the trials	
I commit to having my charging and on board vehicle data recorded and used for trial purposes	
I commit to responding to behavioural research surveys	
I commit to having my home broadband integrated with the trial technology	
If given to me I commit to using a method of preference input, such as a mobile 'phone app/s to state preference and / or journey plan	

I have attached a copy of a recent electricity bill	
I commit to taking part for the duration of the specified trial period, as per the signed Participant Agreement (to follow once survey is approved).	
I understand that the charger offer is valid only if I am eligible for the OLEV Home Charge Grant https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/564537/evhs-guidance-for-customers-v-2.1.pdf	
I understand that I do not have a space on the project unless I receive a home survey	
I understand that if I am not eligible for the OLEV home charge grant I will be invoiced £500 incl VAT.	

Signed	Name
Date	

Appendix B – Privacy Statement

Electric Nation Website Cookies & Privacy Policy

The Electric Nation website is delivered by EA Technology Limited on behalf of the Electric Nation project partners

EA Technology Limited (“We”) are committed to protecting and respecting your privacy.

This policy (together with our terms of use <https://www.eatechnology.com/terms-and-conditions/> and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.eatechnology.com/> you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation 2018 (the Regulation), the data controller is DriveElectric, c/o Fleetdrive Management Ltd., Harleyford Marina, Henley Road, Marlow, Buckinghamshire SL7 2DX.

1. Information we collect from you

We will collect and process the following data about you:

Information you give us. This is information about you that you give us by filling in forms on our site <https://www.eatechnology.com/> (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service or place an order on our site and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number.

Information we collect about you. With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to contact us.

Information we receive from other sources. This is information we may receive about you if you use any of the other websites we operate or the other services we provide. We will notify you should we receive information about you from any third party and the purposes for which we intend to use that information.

2. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy

<http://www.electricnation.org.uk/privacy-cookies/>

3. Uses made of the information

We use information held about you in the following ways:

Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- If you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new client, we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, please select the unsubscribe link on any electronic communication you may receive from us;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- If you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new client, we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, please select the unsubscribe link on any electronic communication you may receive from us;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. Disclosure of your information

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

If EA Technology Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use <https://www.eatechnology.com/terms-and-conditions/> and other agreements; or to

protect the rights, property, or safety of EA Technology Limited, our clients, or others. This may includes exchanging information with other companies and organisations.

5. Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall- protected) servers. All information will be stored in an advanced encryption standard (aes) encrypted database accessible by a limited number of nominated employees.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet..

6. Policy amendments

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

7. Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@eatechnology.com

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note

that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

9. Contact

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to sales@eatechnology.com

Electric Nation Cookies Policy

INFORMATION ABOUT OUR USE OF COOKIES

Our website <https://www.ElectricNation.org.uk/> uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies:

Strictly necessary cookie

– These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookie

– They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Targeting cookie

– These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and any advertising which may be displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we may use and the purposes for which we use them below:

Cookie Purpose

1. Strictly Necessary Cookie

This cookie is essential for our site to:

Recognise you when you return to our site.

Allow you to use our site in a way that makes your browsing experience more convenient. If you register with us or complete any online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.

2. Analytical/Performance Cookie

This cookie is essential for our site to:

Estimate our audience size and usage pattern.

Speed up your searches.

Recognise you when you return to our site.

3. Targeting Cookie

This cookie is essential for our site to:

Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted at your individual interests.

Recognise you when you return to our site.

Allow you to use our site in a way that makes your browsing experience more convenient and for us to deliver a more relevant user experience to you.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after session end.

