



Energy Developments (UK) Ltd Privacy Policy

Introduction

Welcome to Energy Developments (UK) LTD (**EDL UK**) privacy policy.

EDL UK respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we use and look after your personal data when you visit our website (regardless of where you visit it from) or when your organisation is a customer of ours and tells you about your privacy rights.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how EDL UK collects and processes your personal data through your use of this website or when your organisation becomes a customer of



ours, including any data you may provide through this website or when completing our online induction forms, or when you take part in a survey.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

This privacy policy is issued on behalf of EDL UK and when we mention EDL UK, "we", "us" or "our" in this privacy policy, we are referring to EDL UK. EDL UK is a wholly owned company of Energy Developments Pty Limited (**EDP**), which is an Australian registered company. EDP is ultimately owned by CK William Holdings UK Ltd which is a UK registered company. If EDL UK is not the controller of your personal data when your organisation purchases a service from us, we will let you know.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our [data privacy manager] using the Contact details set out below.

Contact details

If you have any questions about this policy, please contact:

Full name of legal entity: Energy Developments (UK) Ltd

2nd Floor, Rickyard Barn

Pury Hill Business Park

Near Alderton Towcester

Northamptonshire

NN12 7LS

Email address: GDPR.UK@edlenergy.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would,



however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in May 2025. Any changes to this privacy policy will be made available on our website or notified to you.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes your name, username or similar identifier, title and gender, position and job title.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from your organisation and other details of services your organisation has purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, IP location, operating system and platform, and other details about your web request to this website.



- Marketing and Communications Data includes your preferences in receiving marketing information from us such as our customer surveys and attendance at events.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with your organisation, or in order to provide services to your organisation, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with your organisation (for example, to provide your organisation with services). In this case, we will notify you at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise, or by interacting with us at conferences or trade fairs. This includes personal data you provide when you:
 - on behalf of your organisation, apply for our services;
 - complete online forms before you visit our sites;
 - enter a competition, promotion or survey;
 - give us feedback or contact us;
 - connect with us at trade fairs or conferences.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, IIS server logs and other similar technologies. Please see our cookie policy <https://edlenergy.com/wp-content/uploads/2020/12/EDL-Cookies-Policy.pdf> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google based outside the EU;



- Identity and Contact Data from LinkedIn;
- We may receive special category personal data and criminal offence data from our suppliers for the purpose of ensuring our sites are secure and only accessed by security approved personnel.

4. How we use your personal data

We use your personal data for the purposes set out in this policy.

As well as informing you of the purposes for which you use personal data, data protection laws require such usage to be in line with various lawful bases for using personal data. The legal bases which we commonly rely upon are set out below and correspond to the purposes set out in the table below.

- Where we need to perform the contract, we are about to enter into or have entered into with your organisation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights and freedoms do not override those interests.
- Where we need to comply with a legal obligation.

Refer to section 10 to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the purposes for which use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest



To register your organisation as a new customer	(a) Identity (b) Contact	Performance of a contract with your organisation
To process and deliver your organisation's order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with your organisation (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with your organisation which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review, take a survey or inviting you to events	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with your organisation (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our



customer relationships and experiences		business and to inform our marketing strategy)
To make suggestions and recommendations to you as a prospective customer about services that may be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing information from us

We may use your Identity and Contact Data to form a view on what we think your organisation may want or need, or what may be of interest to your organisation. This is how we decide which services and offers may be relevant for your organisation (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing. Where we use your Contact Data to direct a marketing communication at your organisation, please note that our intention is to provide information about services which may be of interest to that organisation and not to you in your personal capacity.

Opting out

You can ask us to stop using your Contact Data to send you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transaction.

Cookies

We use cookies on our website to improve your browsing experience and to deliver certain functionality. Please see our separate Cookie Policy at <https://edlenergy.com/wp-content/uploads/2020/12/EDL-Cookies-Policy.pdf> for detailed information about the types of cookies we use (essential, functional, analytical, and marketing), how we obtain consent for non-essential cookies, and how you can control your cookie preferences. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.



[Data Protection and Digital Information Bill Update - Cookie Consent: When the UK's forthcoming Data Protection and Digital Information Act comes into effect, our approach to cookie consent may change, particularly for analytics cookies which may be subject to revised rules. We may implement browser-based cookie preferences in accordance with the new legislation. These changes will be reflected in our Cookie Policy once the legislation is finalised.]

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table section 4 above.

Internal Third Parties

Other companies in the EDL Group acting as controllers or processors and who are based in the EEA, USA, Australia and Hong Kong and provide IT and system administration and marketing services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in Australia or other locations who provide IT and system administration services.
- Professional advisers acting as controllers including lawyers, bankers, auditors and insurers based in the UK and Australia who provide consultancy, banking, legal, insurance and accounting services.



- HM Revenue & Customs, regulators and other authorities acting as controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy or as otherwise notified to you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers processing personal data on our behalf to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We share your personal data within the EDL company Group. This will involve transferring your data outside the European Economic Area (EEA).

Many of our external third-party service providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK or the European Commission (as applicable).
- Where we use service, providers based outside the UK or EEA or if personal data is being sent to an EDL Group company which is outside these regions, we may use specific contracts approved by the UK or European Commission which give personal data the same protection it has in Europe. Specifically:
 - For transfers from the UK, we use the International Data Transfer Agreement (IDTA) or the International Data Transfer Addendum to the EU Commission Standard Contractual Clauses.
 - For transfers from the EEA, we use the 2021 Standard Contractual Clauses.



- Where we use providers based in the US, we may rely on the UK-US Data Bridge, which provides a legal mechanism for ensuring that personal data transferred to certified US organisations is protected to a standard that is essentially equivalent to that required under UK data protection law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

[Data Protection and Digital Information Bill Update - International Transfers: Once the UK's forthcoming Data Protection and Digital Information Act comes into effect, our approach to international transfers may be updated to reflect the UK's greater autonomy in making adequacy decisions and approving transfer mechanisms. This may result in new or modified mechanisms for transferring data outside the UK. We will update our international transfer protocols in accordance with the final legislation.]

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

[Data Protection and Digital Information Bill Update - Privacy Management Programme: When the UK's forthcoming Data Protection and Digital Information Act comes into effect, we will implement a privacy management programme that replaces some of the more prescriptive accountability requirements under current data protection law. This programme will be designed to ensure appropriate data protection governance across our organisation.]

[Data Protection and Digital Information Bill Update - Data Breaches: Once the UK's forthcoming Data Protection and Digital Information Act comes into effect, our approach to data breach notification may be modified to align with the risk-based approach outlined in the new legislation. This may affect when and how we notify you and regulators of personal data breaches. We will update our breach notification procedures in accordance with the final legislation.]

8. Data retention

How long will you use my personal data for?



We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Specific retention periods include:

- **Customer contact information:** Six years after they cease being customers for tax purposes.
- **Former customer employee information:** 6 months after we have been notified you have left that organisation.
- **Prospective customer information:** Up to 6 months after we know that you will not become a customer of ours or up to 6 months after we have been notified you have left that organisation.

In some circumstances you can ask us to delete your data: see section 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

[Data Protection and Digital Information Bill Update - Anonymisation Standards: When the UK's forthcoming Data Protection and Digital Information Act comes into effect, our approach to anonymisation may be updated to reflect the Bill's new definition and threshold for anonymous data. This may affect how we anonymise personal data for research and statistical purposes. We will update our anonymisation protocols in accordance with the final legislation.]

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:



- **right to access personal information** – you have a right to obtain confirmation of whether we are processing your personal information, access to your personal information unless an exemption applies and information regarding how your personal information is being used by us;
- **right to have inaccurate personal information rectified** – you have a right to have any inaccurate or incomplete personal information rectified. If we have disclosed the relevant personal information to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- **right to have personal information erased in certain circumstances** – you have a right to request that certain personal information held by us is erased. This is also known as the right to be forgotten. This is not a blanket right to require all personal information to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your personal information.
- **right to restrict processing of personal information in certain circumstances** – you have a right to block the processing of your personal information in certain circumstances. This right arises if you are disputing the accuracy of personal information, if you have raised an objection to processing, if processing of personal information is unlawful and you oppose erasure and request restriction instead or if the personal information is no longer required by us but you require the personal information to be retained to establish, exercise or defend a legal claim;
- **right to data portability** – in certain circumstances you can request to receive a copy of your personal information in a commonly used electronic format. This right only applies to personal information that you have provided to us (for example by completing a form or providing information through a website). Information about you which has been gathered by monitoring your behaviour will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the personal information must be processed for the performance of a contract and the processing is carried out by automated means (i.e., electronically);
- **right to object to processing of personal information in certain circumstances, including where personal information is used for marketing purposes** – you have a right to object to processing being carried out by us if (a) we are processing personal information based on legitimate interests or for the performance of a task in the public interest (including profiling), (b) if we are using personal information for direct marketing purposes, or (c) if information is being processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information; and



- ***right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect*** – you have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similar significant effect on you.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

[Data Protection and Digital Information Bill Update - Data Subject Access Requests: When the UK's forthcoming Data Protection and Digital Information Act comes into effect, we may apply the "vexatious or excessive" test when assessing data subject access requests, replacing the current "manifestly unfounded or excessive" standard. We may charge reasonable fees for requests deemed to be vexatious or excessive. This approach will be implemented in accordance with the final legislation.]