

## RETAIL ENERGY CODE COMPANY LTD (RECCo) Privacy Notice

### Key Summary

This Privacy Notice is provided by the Retail Energy Code Company Limited. We are responsible for the governance of the Retail Energy Code (the Code), which is one of the key governance and market operation arrangements (including the new central switching service arrangements) enabling the operation of a competitive energy retail market in Great Britain.

The key personal data for which we are the controller relates to:

- employees of the Retail Energy Code Company Limited;
- individuals who are representatives of parties and other market participants under the Code, whose data we process in relation to arranging meetings, recording meeting minutes, submitting invoices, Code changes, other Code management matters, and notifying Code related developments;
- individuals who serve on the REC Board, the REC Panel or sub-committees of the REC Board or the REC Panel, whose data we process in relation to arranging meetings, recording meeting minutes and notifying Code related developments;
- individuals who are or who represent our service providers, whose data we process in relation to contract management;
- individuals who are or who represent potential service providers, whose data we process in relation to potential future contracts;
- individuals who use our website; and
- individuals who send general enquiries to us.

This notice explains what data we process, why, how it is legal and the rights of data subjects.

### About Us and This Notice

This Privacy Notice is provided by the Retail Energy Code Company Limited ("RECCo" or "we" or "us"). We are a controller for the purposes of the Data Protection Laws. We take your privacy very seriously and ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights.

### How to contact us

If you would like this Privacy Notice in another format (for example audio, large print, braille) please contact us at the details below:

Contact: Data Protection Officer

Address: 27 Old Gloucester Street, London, England, WC1N 3AX

Email: [info@retailenergycode.co.uk](mailto:info@retailenergycode.co.uk)

## Changes to this Privacy Notice

The latest version of the Privacy Notice can be found at: [www.retailenergycode.co.uk](http://www.retailenergycode.co.uk). We may change this Privacy Notice from time to time. We will alert you on our website when changes are made.

Current version: APRIL 2025

## Glossary

Please familiarise yourself with the following words and phrases (used in bold) as they have particular meanings in the Data Protection Laws and are used throughout this Privacy Notice:

TERM	DEFINITION
CODE	This means the Retail Energy Code, which can be found on our website at <a href="http://www.retailenergycode.co.uk">www.retailenergycode.co.uk</a> .
CONTROLLER	This refers to the company or other entity which determines the purposes for which, and the manner in which, any personal data is processed.
CRIMINAL OFFENCE DATA	This means personal data relating to criminal convictions and offences or related security measures. It covers a wide range of information about offenders or suspected offenders in the context of criminal activity; allegations; investigations; and proceedings. It may also include personal data about unproven allegations and information relating to the absence of convictions.
DATA PROTECTION LAWS	This means the laws which govern the handling of personal data. This includes the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 and any other national legislation that relates to data protection and privacy.
ICO	This means the UK Information Commissioner's Office, which is the UK regulator responsible for implementing, overseeing, and enforcing the Data Protection Laws.
MPxN	This means the unique reference number used to identify electricity Metering Points or gas Supply Meter Points.
PERSONAL DATA	Personal data only includes information relating to natural persons who: can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information.
PROCESSING	This covers anything that can be done with personal data, including: <ul style="list-style-type: none"><li>• obtaining, recording, retrieving, consulting, or holding it;</li><li>• organising, adapting, or altering it;</li><li>• disclosing, disseminating, or otherwise making it available; and</li><li>• aligning, blocking, erasing, or destroying it.</li></ul>
PROCESSER	This refers to the company or other entity which processes the personal data on behalf of the controller.
REC	The Retail Energy Code
REC BOARD	This refers to the board of directors of RECCo.
REC PANEL	This refers to the panel established under the Code.
REC PARTIES	This means each 'Party' under and as defined in the Retail Energy Code.
REC PORTAL	The secure portal provided on behalf of RECCo to REC parties.

SPECIAL CATEGORIES OF DATA	This means any information relating to: <ul style="list-style-type: none"><li>racial or ethnic origin;</li><li>political opinions;</li><li>religious beliefs or beliefs of a similar nature;</li><li>trade union membership;</li><li>physical or mental health or condition;</li><li>sexual life; or</li><li>genetic data or biometric data for the purpose of uniquely identifying you.</li></ul>
THEFT DETECTION INCENTIVE SCHEME (TDIS)	This is as described in Annex 3 of the Energy Theft Reduction Schedule.
WEBSITE	Our website at <a href="http://www.retailenergycode.co.uk">www.retailenergycode.co.uk</a> .

## What Personal Data Do We Collect?

### Personal Data Relating to You

Employees of the Retail Energy Code Company Limited (The Company) Throughout employment and sometimes after the termination of employment, the Company will need to process data about employees. The kind of data that the Company will process includes:

- any references obtained during recruitment;
- details of terms of employment;
- payroll details;
- tax and national insurance information;
- details of job duties;
- details of benefits elected or amended;
- details of health and sickness absence records;
- details of holiday records;
- information about performance;
- details of any disciplinary and grievance investigations and proceedings;
- training records;
- contact names and addresses including those of next of kin and other persons identified for the purposes of administering employee benefits (e.g., beneficiaries, family members covered by insurance arrangements etc.)
- correspondence with the Company and other information that you have given the Company.

The Company believes that those records are consistent with the employment relationship between the Company and yourself and with the data protection principles.

In some cases, the Company may hold sensitive data, which is defined by the legislation as special categories of personal data, about you. For example, this could be information about health, racial or ethnic origin, criminal convictions, trade union membership, or religious beliefs. This information may be processed not only to meet the Company's legal responsibilities but, for example, for purposes of personnel management and administration, suitability for employment, and to comply with equal opportunity legislation. Since this information is considered sensitive, the processing of which may cause concern or distress, you will be asked to give express consent for this information to be processed, unless the Company has a specific legal requirement to process such data.

Representatives of parties and other market participants under the Code  
Parties and other market participants under the Code are required or permitted to propose contract managers and other representatives to act on their behalf in relation to the Code. If you are one of these representatives, we will collect your personal data from you when you make a general enquiry about acceding to the Code (for which please see below) and/or when you register on the REC Portal. We will process your personal data for the purposes described in the Code. This includes processing your personal data in relation to arranging meetings, recording meeting minutes, submitting invoices, progressing Code changes, and providing notices under the Code. We will also process your personal data for other Code management related matters, such as notifying Code related developments or any other purposes relating to the operation of the Code or the role of the party you represent as a

RECCo shareholder. For this purpose, we process the following personal data: name, contact details, job title, place of work.

Those who serve on the REC Board, the REC Panel, or sub-committees of either of them

We collect your personal data from you when you apply for the role of board director, REC Panel member or sub-committee member and at the time of your appointment to the role. We will process your personal data as part of that application and for the purposes of arranging meetings, recording meeting minutes, notifying Code related developments, and for all other matters relating the operation of RECCo. For this purpose, we process the following personal data: name, contact details, job title, place of work, date of birth and personal address.

#### Service provider contract management

If you are one of our service providers, or if you represent one of our service providers, then we will collect your personal data from you when we communicate with your organisation and/or when we appoint your organisation as a service provider and we will process your personal data in relation to our management of the service provider contract. For this purpose, we process the following personal data: name, contact details, job title, place of work. If you are a self-employed contractor, we will also process your personal address if you do not have a separate business address.

#### Potential service provider list

If you are, or if you represent, a potential service provider that has indicated a willingness to be considered for future contracts which we may enter into, then we will collect your personal data from you when we communicate with your organisation and/or when we first appoint your organisation as a service provider. We will process your personal data so that we can alert you to future contracting opportunities and use your personal data in relation to the tender process for those contracting opportunities. For this purpose, we process the following personal data: name, contact details, job title, place of work. If you are a self-employed contractor, we will also process your personal address if you do not have a separate business address, and we will keep records of how and when you contacted us and a description of your areas of expertise that are potentially relevant to our business.

#### Individuals connected with energy theft investigations

We are obliged under the REC to collect criminal offence data relating to investigations of suspected or actual cases of energy theft. These investigations are undertaken by the REC party appointed as the registered supplier for the MPxN where the suspected energy theft is taking place, or as appropriate the relevant Gas Transporter or Distribution Network Operator.

We will process the criminal offence data for the effective operation of the Theft Detection Incentive Scheme, for the prevention, detection and deterrence of energy theft, to provide intelligence warnings to REC Parties of individuals and organisations suspected of involvement in energy theft and to support the effective analysis of energy theft trends and for associated performance assurance activities.

For these purpose, we process the following personal data: MPxN, supply address, supplier account number, account holder name, billing address, meter serial number, and full

investigations data relating to the alleged theft. We may also share this information with law enforcement partners and other Industry bodies.

### Energy consumers

We are obliged under the REC to undertake performance assurance functions which we do through our appointed provider (which we refer to as the RPA). The RPA function is designed to assess parties to the REC against particular Retail Risks (as defined in the REC) in order to improve consumer experience and reduce consumer detriment. In order to assess compliance of REC parties against the REC, the RPA requires data to perform performance assurance and testing activity. All analysis is performed in relation to REC parties or overall REC Market Activities (as defined in the REC) and no analysis is performed in respect of individual consumers. The processing of the data is necessary for RECCo to fulfil its obligations under the REC to facilitate the efficient and effective operation of the retail energy market.

For this purpose we process the following personal data: MPxN, complaints information (including in relation to status, dates, category), switching-related meta data and master data (mapping of MPxN to supplier, meter point address data, prepayment portfolio data) relating to meter points.

The personal data we process for performance assurance functions will vary depending on the type of operation by energy suppliers and other market participants that we are assessing, however a full list of the data fields used for our RPA function is set out in the Performance Assurance Report Catalogue which we will make available to you without charge if you contact us using the contact information set out at the start of this privacy notice.

### Website usage information

If you are just visiting our website, we will not collect personal data.

However, we do use cookies. Cookies are small files saved to your computer's hard drive that track, save, and store information about your interactions and usage of our website. Cookies allow us to store your preferences to correctly present content, options, or functions throughout our website. They also enable us to see information like how many people use our website and what pages they tend to visit.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. We also give you the option of disabling all cookies other than those which are categorised as "Necessary" for the functioning of the website. If you would like more information about this practice, including how to prevent it, please visit [www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or [optout.networkadvertising.org](http://optout.networkadvertising.org).

Below is a list of all cookies utilised within our website:

Cookie Name	Duration	Category	Description
cookieyes-consent	1 Year	Necessary	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the site visitors.
elementor	Never	Necessary	The website's WordPress theme uses this cookie. It allows the website owner to implement or change the website's content in real-time.
rc::a	Session	Necessary	This cookie is set by the Google reCAPTCHA service to identify bots to protect the website against malicious spam attacks.
rc::c	Session	Necessary	This cookie is set by the Google reCAPTCHA service to identify bots to protect the website against malicious spam attacks.
_cfuvid	Session	Necessary	Calendly sets this cookie to track users across sessions to optimize user experience by maintaining session consistency and providing personalized services
--cf_bm	1 Hour	Functional	Cloudflare set the cookie to support Cloudflare Bot Management.
_lscache_vary	2 Days	Functional	Litespeed sets this cookie to provide the prevention of cached pages.
ytidb::LAST_RESULT_ENTRY_KEY	Never	Functional	The cookie ytidb::LAST_RESULT_ENTRY_KEY is used by YouTube to store the last search result entry that was clicked by the user. This information is used

			to improve the user experience by providing more relevant search results in the future.
yt-remote-session-app	Session	Functional	The yt-remote-session-app cookie is used by YouTube to store user preferences and information about the interface of the embedded YouTube video player.
yt-remote-cast-installed	Session	Functional	The yt-remote-cast-installed cookie is used to store the user's video player preferences using embedded YouTube video.
yt-remote-session-name	Session	Functional	The yt-remote-session-name cookie is used by YouTube to store the user's video player preferences using embedded YouTube video.
yt-remote-fast-check-period	Session	Functional	The yt-remote-fast-check-period cookie is used by YouTube to store the user's video player preferences for embedded YouTube videos.
_ga	1 Year, 1 Month, 4 Days	Analytics	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.
_ga_*	1 Year, 1 Month, 4 Days	Analytics	Google Analytics sets this cookie to store and count page views.
vuid	1 Year, 1 Month, 4 Days	Analytics	Vimeo installs this cookie to collect tracking information by setting a unique ID to embed videos on the website.
YSC	Session	Advertisement	Youtube sets this cookie to track the views of embedded videos on Youtube pages.

VISITOR_INFO1_LIVE	6 Months	Advertisement	YouTube sets this cookie to measure bandwidth, determining whether the user gets the new or old player interface.
yt-remote-device-id	Never	Advertisement	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
yt.innertube::requests	Never	Advertisement	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
yt.innertube::nextId	Never	Advertisement	YouTube sets this cookie to register a unique ID to store data on what videos from YouTube the user has seen.
VISITOR_PRIVACY_METADATA	6 Months	Advertisement	YouTube sets this cookie to store the user's cookie consent state for the current domain.
yt-remote-connected-devices	Never	Advertisement	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
AWSALBTGCORS	7 Days	Strictly necessary	AWS Application Load Balancer Cookie: This load-balancing cookie is managed by AWS and is for Weighted Target Groups associated with cross-origin resource sharing (CORS) requests.
AWSALBTG	7 Days	Strictly necessary	AWS Application Load Balancer Cookie: The ASWALBTG cookie is a load balancer-generated cookie for Weighted Target Groups. It is used to honor sticky sessions and enable target group stickiness.

\* We categorise all cookies to allow you to select which categories of cookies (other than Necessary) you wish to disable.

### General enquiries

We always welcome general enquiries concerning the Code, or from prospective parties considering acceding to the Code. During this interaction we process the following: name, contact details including email address, place of work, job title and details of the enquiry. We do not actively request special categories of data, but we may come across them if you provide them to us.

### Personal data about other individuals

If you provide us with information about other individuals, you confirm that you have informed the relevant individuals accordingly.

### Why Do We Process Your Personal Data?

We use your personal data for the following purposes listed in this section. We are allowed to do so on certain lawful bases - please see section 'How is processing your data lawful'.

Personal Data Relating To	Purpose	Lawful Basis
Employees of the Retail Energy Code Company Limited	For management and administrative use only. The Company may, from time to time, need to disclose some data it holds about you to relevant third parties (e.g. where legally obliged to do so by HM Revenue & Customs, where requested to do so by yourself for the purpose of giving a reference or in relation to maintenance support and/or the hosting of data in relation to the provision of benefits including but not limited to insurance).	Contract: Our processing of this personal data is necessary to fulfil the terms under the employment contract, enrol you in employee benefit plans and to pay you. Legal Obligation: In certain circumstances our processing of this personal data is necessary to meet legal obligations, e.g., to comply with taxation or pensions legislation.
Representatives of parties and other market participants under the Code	For the purposes described in the Code, for notifying Code related developments and for any other purposes relating to the operation of the Code or the role of the party you represent as a RECCo shareholder.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in ensuring the proper governance of the Code.
Those who serve on the REC Board, the REC Panel, or sub-committees of either of them	To arrange meetings, record meeting minutes and notify Code related developments.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in ensuring the proper governance of the Code.
Service provider contract management	To manage contracts with our service providers.	Legitimate Interests: Our processing of this personal

		data is necessary for our legitimate interests in ensuring the proper operation and management of contracts to which RECCo is a party.
Potential service provider list	To alert you of and to manage future contracting opportunities.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in ensuring an efficient and transparent approach to procuring services from potential suppliers.
Website usage information	To provide website functionality.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in ensuring the functionality of and accessibility to our website.
General enquiries	To assist and respond to enquiries.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in the dissemination of information regarding the REC and RECCo's governance role relating to the REC.
Energy consumers	To enable Performance Assurance analysis of REC Parties (Energy Suppliers) against specific Retail Risks identified in the REC Retail Risk Register. Personal data is sourced from REC Parties (Energy Suppliers) directly. All analysis is performed in relation to REC Parties or overall REC Market Activities. No analysis is performed in respect of individual consumers.	Legitimate Interests: Our processing of this personal data is necessary for our legitimate interests in ensuring the proper governance of the Code.
Criminal Offence Data	Data relating to theft of energy investigations conducted by REC Parties (Energy Suppliers) and their agents is collected and processed. Compliance with a legal obligation under the REC	Legitimate Interests: Our processing of this criminal offence data is necessary for our legitimate interests in the implementation, management and operation of the REC to facilitate the efficient and effective running of the retail

	<p>to which the controller is subject.</p>	<p>energy market. In addition to the lawful bases set out above, RECCo's processing of criminal offence data meets the following 2 conditions of Schedule 1 of the Data Protection Act 2018:</p> <ul style="list-style-type: none"><li>• Condition 10 (Preventing or detecting unlawful acts)</li><li>• Condition 12 (Regulatory requirements relating to unlawful acts and dishonesty etc.)</li></ul>
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## How is Processing Your Personal Data Lawful Personal Data

We are allowed to process your personal data for the following reasons and on the following lawful bases:

- Contract - We are permitted to process employees' personal data when it is necessary to comply with a contract we have in place with the employee.
- Legal Obligation - We are permitted to process employees' personal data when it is necessary to comply with the law.
- Legitimate Interests - We are permitted to process your personal data when it is necessary for our 'legitimate interests'.

We have considered the impact on your interests and rights and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to any of the processing that we carry out on the grounds outlined above (see the section "Your Rights" to find out how).

## Who Will Have Access To Your Personal Data?

Like any business, we use external providers to operate our business, such as website hosting, enquiry functionality and chat functions. Some of these providers will process your personal data as part of the services they offer to us as our processors. We take steps to ensure that our service providers process your data in accordance with the Data Protection Laws, only use it in accordance with our contract with them and keep it secure. If you would like more information about our processors, please contact us using the details at the "How to contact us" section.

We will also share your personal data with the police, other law enforcements or regulators where we are required by law to do so.

## How do we keep your personal data secure

We strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

## When Will We Delete Your Data

The following categories of personal data will be kept for the following periods.

Personal Data Relating To	Retention Period
Employees of the Retail Energy Code Company Limited	Unless we have agreed to remove certain information sooner (e.g., records relating to performance, grievances or disciplinaries), or the law requires us to remove certain records sooner, 6 years following the termination of employment.
Representatives of parties and other market participants under the Code	During the course of the data subject's position as a representative and 12 months after leaving the position.
Those who serve on the REC Board, the REC Panel, or sub-committees of either of them.	During the course of the data subject's position and for 7 years after leaving the position.
Service provider contract management	During the course of the contract with the service provider and for 7 years after termination of the contract.
Potential service provider list	For period of 18 months from date of initial contact.
Website usage information	Not currently stored.
General enquiries	During the course of dealing with the enquiry and for 18 months afterwards.
Individuals connected with energy theft investigations	A maximum of 6 years from the date of receipt of the data from the relevant REC party.
Energy consumers	Data will be subject to lifecycle management, with most data expected to be retained for 14- 28 months

At the end of the relevant retention period we will securely destroy the relevant personal data.

## Your Rights

As data subjects you have the following rights under the Data Protection Laws:

- Right to object to processing of your personal data;
- Right of access to personal data relating to you;
- Right to correct any mistakes in your information;
- Rights in relation to automated decision making (note this does not apply);
- Right to prevent your personal data being processed;
- Right to have your personal data ported to another controller; and
- Right to erasure.

These rights are explained in more detail below. If you want to exercise any of your rights, please contact us (please see "How to contact us" above). You are not required to pay any charge for exercising your rights.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.

### Right to object to processing of your personal data

You may object to us processing your personal data where we rely on a legitimate interest as our legal grounds for processing, however we do not rely on legitimate interests as a ground for processing your personal data.

### Right to access personal data relating to you

You may ask to see what personal data we hold about you and be provided with:

- a copy of the personal data;
- details of the purpose for which the personal data is being or is to be processed;
- details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which the personal data is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling. To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

### Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

### Right to restrict processing of personal data

You may request that we stop processing your personal data temporarily if:

- you do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
- the processing is unlawful, but you do not want us to erase your data;
- we no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override our legitimate interests.

### Right to data portability

You may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

### Right to erasure

You can ask us to erase your personal data where:

- you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent, and we cannot otherwise legally process your data;
- you object to our processing, and we do not have any legitimate interests that mean we can continue to process your data; or
- your data has been processed unlawfully or have not been erased when it should have been.

### Complaints to the Regulator

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have processed your data in accordance with this notice - you should let us know as soon as possible. You may also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: [www.ico.org.uk](http://www.ico.org.uk).