



Privacy Notice

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This Privacy Notice informs you of your rights under the General Data Protection Regulation/Data Protection Act 2018 and sets out how we will use and protect your personal information. Kinecx Energy is committed to protecting your data and ensuring your right to privacy is upheld. Kinecx Energy is a trading name of Kinecx Energy Limited. When we refer to “Kinecx Energy, “we”, “us” or “our”, we mean the relevant data controller, as appropriate. When we refer to “you” or “your” we mean any individual that receives services or products from us.

Please read the detail of this Privacy Notice carefully as it provides important details about what information we collect, how we use your personal information, the steps we take to protect it, and the steps you can take to control it.

How do we collect your information?

This Privacy Notice will apply to all personal information that you share with us; this can be any piece of information that can be used to identify you.

From you:

We will collect your personal information when you contact us via the Kinecx Energy website, social media, phone, email, SMS, post and in person. We will process the information you provide to us when you apply for a service from Kinecx Energy, or to allow us to understand if you are eligible for a service we offer. We will also collect your information if you choose to complete a survey or enter one of our public competitions or promotions.

From third parties:

We may also receive your personal information from third parties, including:

Other Utility Companies: Kinecx Energy may receive your information from utilities with whom you already have a relationship, including gas suppliers (e.g., firmus energy (Supply) Limited, Electric Ireland, Energia, Flogas Natural Gas, Flogas Enterprise Solutions, Go Power or SSE Airtricity).

Authorised Third Party Contractors: This includes Gas Safe registered engineers you have engaged with, our construction partners and the 24-hour NI Gas Emergency Service.

Downstream Installers: Kinecx Energy require you to confirm you have used a Gas Safe registered installer to complete the work at your property before a connection can proceed. If you have applied for an incentive, we may need additional information to verify your application

Third Party Intermediaries: e.g. Contracted Energy Brokers acting on your behalf. Other Individuals Associated with Your Property: This includes landlords, Housing Executive/Associations, tenants or other associated with your property.

Other Third Parties You Appoint: This could include any nominated individual, such as a member of your family, a public body, or a legal or elected representative.

What information do we collect?

When you interact with Kinecx Energy, we collect and process the personal information you provide to us in order to facilitate your requests. The specific information we collect will vary depending on the nature of your interaction with us.

If you interact with us about a connection to the Kinecx Energy network, we will collect: name, phone number, email address, connection address, landlord details, gas user details (if different from the applicant), Special consideration identifiers, Supply Meter Point (SMP) number, marketing preferences, organisation type, meter access information, records of contact with Kinecx Energy i.e. correspondence via phone, email, office visit & post. If you apply for an incentive/grant at the time of connection, we may collect additional information to decide if you are eligible and manage your application. This may include household income or the make-up of your home. Exact requirements will depend on the scheme and relevant details will be provided as part of the scheme's terms and conditions. We use this information to determine if you are eligible for a natural gas connection and then to install and manage that connection. If you do not proceed with a connection to the natural gas network, we will securely dispose of your information in line with the Kinecx Energy Data Retention and Disposal Policy.

Special Categories of information

Under Data Protection legislation, special categories of personal information can include data relating to your health, biometric data for the purpose of identification, racial and ethnic origin or your political opinions. Processing this type of information is prohibited unless it is necessary and there are additional security measures in place.

We will only collect and process this type of information when it is required, examples of special categories we collect and how they are treated are:

Health Information: Kinecx Energy uses special consideration identifier codes to highlight properties where occupants may require extra assistance. This includes needing extra time, physical or mobility concerns, hearing or sight impairments, speech difficulties or language barriers and communication limitations. If you have registered with your gas supplier's care scheme, they will share your personal details with us along with any vulnerabilities or support needs you have disclosed to them. This data is shared to ensure that Kinecx Energy can take into consideration specific needs in the event of emergencies, major incidents or during network maintenance and siteworks being carried out by us or our third-party contractors.

Adaptation of Correspondence: If you have requested an adaptation of correspondence (e.g., audio or braille formats), we will need to share your information with third parties such as RNIB to facilitate this.

Accidents Involving Kinecx Energy: If you are in an accident involving Kinecx Energy property or representatives, we will record this information for insurance and Health and Safety Executive (HSE) purposes and share it with the appropriate authorities.

Special Categories of information

Language Information: If English is not your primary language, we may record this information to improve the service offered. We may share this information with our contracted partners who will be attending your property, ensuring that you will receive the best service from Kinecx Energy.

Financial Information: If you are implicated in suspected instances of illegal interference with your natural gas connection or any Kinecx Energy property (including the natural gas network, meter or your supply of natural gas), we will record your details and investigate accordingly. This may include sharing the information with the appropriate authorities. If your account is referred to our Revenue Protection team, you may be required to provide additional financial information so we can manage your debt and repayment plan. We may share this with debt recovery and debt management agencies

Why do we process your information

We will only process your information when it is lawful to do so. Below are the most common reasons for processing your information:

Contract: We will process your information to fulfil our contract with you and provide you with the service you have requested.

Legal Obligation: As a regulated business, Kinecx Energy will process your information to comply with legal and regulatory requirements, including licenses, codes and industry agreements set out by the Utility Regulator.

Consent: In some circumstances we will ask for your consent to process your information. This could be in relation to a competition you have entered or for providing a customer testimonial.

Legitimate Interest: To operate our business effectively, we may need to process your personal data for the following purposes:

- To run, grow and develop our business
- To meet our contractual obligations with third parties
- To detect and prevent fraud
- To enhance the security of our network and information systems
- To ensure our internal processes and procedures are as efficient as possible
- To better understand how people interact with us
- To analyse and enhance the information we collect
- To assess the effectiveness of our marketing campaigns
- To enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers.

How do we use your personal information

Kinecx Energy will only use your information in accordance with your request for services or other purposes set out in this Privacy Notice. We will process your data, so we can:

- Check to see if you are eligible for the services we provide
- Facilitate your connection to the Kinecx Energy natural gas network
- Manage your connection on an ongoing basis and deliver the best possible service to you
- Process and verify your application for external grants or offers, e.g. Northern Ireland Sustainable Energy Programme
- Communicate with other utilities in accordance with industry requirements and your requests - Ensure that your information is shared with your chosen gas supplier
- Switch your gas supplier, in accordance with your request
- Ensure the continued safe use of the natural gas network
- Respond to gas emergencies at your property
- Respond to gas emergencies reported by you
- Ensure continued monitoring and maintenance of the natural gas network asset, including the meter located at your property
- Respond to queries or complaints concerning our business activities or representatives
- Ensure the health and safety of you, the public and Kinecx Energy representatives
- Maintain a list of priority and vulnerable customers for emergency scenarios, and treat you accordingly
- Comply with procedures, regulations and legislative requirements that apply to us
- Prevent and/ or detect illegal activity, support the investigation of criminal or fraudulent activity, protect the safety of individuals, respond to any claims, or protect our rights
- Support ongoing training and business improvements for Kinecx Energy staff and procedures
- Provide you with information about relevant products or services according to your marketing preferences
- Perform any other activity for which you have provided consent.
- Meet our obligations under the mandatory Code of Practice (CoP) for Consumers in Vulnerable Circumstances

Who do we share your information with

We may share your information with the following authorised third parties:

Other Utilities: In order to fulfil our various licence, network code and industry agreement conditions, including the obligations under the mandatory Code of Practice for Consumers in Vulnerable Circumstances, we may be need to share your information with other utilities, including other network operators (e.g. Phoenix Energy Group Ltd or SGN Evolve Network Ltd) or gas and electricity suppliers (e.g. firmus energy (Supply), Electric Ireland, Energia, Flogas Natural Gas, Flogas Enterprise Solutions, Go Power, or SSE Airtricity).

Regulators and Other Legally Appointed Bodies: To comply with our legal or regulatory requirements, we may need to share your information with the Department for the Economy, the Utility Regulator, the Health & Safety Executive, the Energy Saving Trust, the Department for Energy Security and Net Zero, FTI Consulting and PwC UK. This may include verifying eligibility for grant-funded schemes, assisting with the implementation of government support schemes or responding in accordance with our complaints process.

The Consumer Council: If the Consumer Council is managing a complaint or enquiry on your behalf regarding your interactions with Kinecx Energy, we may need to share your information with them to effectively respond and resolve the matter.

Debt Collection Agencies: If you have outstanding debt with Kinecx Energy, we may share your details with a debt collection agency.

Contracted Mailing House: Our mailing house may send you correspondence on our behalf. They will manage your address information and mailing preferences to ensure your information is kept up to date.

Local Authorities, Housing Associations, Letting Agents and Landlords: Depending on your circumstances, we may contact NIHE, your Housing Association or your landlord/letting agent to verify details of your account or carry out works on your meter and associated installation.

Emergency Services: In the event of a gas emergency or safety-related situation (e.g., suspected gas escape), or when investigating criminal or suspected fraudulent activity, we may share information with emergency services to ensure safety and compliance with legal obligations.

Local Authorities and/or Law Enforcement: To comply with applicable laws and regulations or in response to legal process we may share your information as requested by law enforcement.

Who do we share your information with

Employees, Approved Third Party Suppliers, Partners and Sub-Contractors: In the course of providing our services, we may share your information with a variety of third parties who help facilitate our operations. This includes, but is not limited to, Kinecx Energy employees, consultants, legal advisors, technical support services, telecommunications providers, construction contractors, cloud services, payment processors, insurers, logistics providers, installers and NI Gas Emergency contact centre services.

Any Other Parties for Whom You Have Provided Consent: Examples of this could be your appointed representative or advocate, or an additional named person on your account.

How do we store your information

The security of your personal information is paramount to us. A range of appropriate technical, physical and organisational security measures have been integrated within our organisational management structure, operational processes and information technology to protect your personal information.

How long do we keep your information

We will retain your personal data only for as long as is necessary, for the purposes for which it was collected and in order to meet our regulatory and legal obligations. Personal data that is no longer required or has reached applicable statutory and regulatory best practice periods for retention will be securely disposed of. All personal data is retained and/or disposed of in line with the Kinecx Energy Retention and Disposal Policy, which is managed by the Data Protection Officer (contact details at the end of this document). In order to determine the retention period for your personal information, we consider the nature, sensitivity, risk and impact of a breach to you, the security measures we have in place and the legal obligations we have to retain the information. We will only keep your information for as long as it is required to fulfil the purpose of the collection and will dispose of it securely.

If you are connected to the Ten Towns network: We will store your information associated with the connection to the natural gas network for the life of the asset and the contract's validity – this is required for emergency response and ongoing maintenance of the natural gas network. If you do not proceed with a connection to the network, we will keep a record of enquiry for 2 years, after which time, we will dispose of this in a secure manner.

Kinecx Energy may anonymise certain data, adding an additional layer of security encryption. This means it will no longer be associated with you and therefore it will not be subject to the Retention & Disposal Policy. We may further process this anonymised information; however, you will not be associated with the data.

Failure to provide personal information

Please note, where we need to collect your personal information by law or under the terms of any contract with you, we may not be able to provide, or continue to provide, services to you if you fail to provide this information to us when requested.

Automated decision making

This is when automated processing is used to make decisions about you that have a legal effect or similarly significant consequences. Kinecx Energy does not employ automated decision making in any of our processing, therefore you will not be subject to decisions based solely on automated processing.

Advertising and Marketing

In order to inform you about new and existing products, Kinecx Energy may send you relevant marketing material. You will only receive these communications if you have actively opted in, and you can opt out at any time. We will never share your information with third parties for their own marketing activities.

International Transfers

International transfers of your data may occur, when relevant, for the purposes described in this Privacy Notice, such as the administration, development and operation of IT systems. In some cases, this may involve processing outside of the European Economic Area (EEA) and UK.

Some of the back-office support services offered by our contracted partners are cloud based, and your personal information may be transferred outside the EEA and UK. In these cases, we take a number of additional steps to reasonably ensure that your personal information will continue to be treated securely and in accordance with this Privacy Notice and our obligations under data protection legislation.

Your rights under the law

Data Protection laws provide you with a number of rights in relation to how we can use your personal information. Where you contact us to exercise your rights, we may need you to provide some additional information to verify your identity.

- Right to be informed: You have the right to be informed about the personal information we collect, how your personal information is being used, and from whom we collect your personal information when we obtain it from other sources.
- Right to access: You have a right to have copies of the personal information we hold about you by way of a subject access request.
- Right to rectification: You have the right to ask us to change or complete any inaccurate or incomplete or incorrect personal information that we hold about you.
- Right to erasure: You have a right to have personal data erased in certain circumstances
- Right to restriction: You have the right to request the blocking or deletion of your personal information in certain circumstances.
- Right to data portability: You have the right to request that we port elements of your information either to you or another energy provider.

Your rights under the law

- Right to object: You have the right to object to us processing your personal information in certain circumstances.
- Right to withdraw consent: Where information is being processed based on your consent you have the right to withdraw your consent to process your personal information. We will not continue to process your personal information unless there is another valid legal basis for doing so. To withdraw your consent, please contact us using the contact information set out below. In the event that you withdraw your consent we may not be able to provide services to you.

Changes to our Privacy Notice

Kinecx Energy keeps its privacy notice under regular review, and any updates will be published on the website at firmusenergy.co.uk/privacy. The privacy notice was last updated on 5th February 2025.

How to contact us

If you have any questions about the Kinecx Energy Privacy Notice, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email: DPO@kinecxenergy.co.uk

Call: 0330 2367 090

Write: Data Protection Officer Kinecx Energy A4-A5 Ferguson's Way Antrim BT41 4LZ

If you are unhappy with the way in which we process your personal information, allow us to attempt to resolve this by contacting the DPO, details above. If you remain unsatisfied, you have the right to raise this with the UK Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 111

