

Privacy notice: Demand Side Response

1 Demand Side Response and your personal data

This privacy notice applies to the extent we process the personal data of end-users of electrical devices who are not energy customers of a Centrica company, that are remotely optimised via Centrica's Demand Side Response services. In these situations the data controller is Centrica Business Solutions Belgium NV ('we', 'us', 'our' or 'CBS'), part of the Centrica group.

The notice explains our use of personal data in relation to Demand Side Response services and trials. The notice does not apply to processing of data that is not personal data within the meaning of the General Data Protection Regulation (EU) 2016/679 (the 'GDPR'). We may change this notice from time to time to ensure it is up to date and accurate. Changes will be posted on this page.

2 What is Demand Side Response?

Demand Side Response adapts electricity consumption to:

- Provide balancing (or congestion) services to Transmission System Operators (TSOs) or Distribution System Operators (DSOs).
- Optimise devices against price signals in the energy markets.
- Adapt demand to behind the meter electricity production or constraints.

TSOs operate the high-voltage electricity distribution networks, usually at a national level. One of their functions is to balance the supply and demand for electricity in real time so that at any one moment the network is not overloaded by surplus electricity from generators or excessive demand from consumers. DSOs, which operate the lower voltage distribution networks, also participate in load balancing.

Our balancing service allows consumers to benefit from additional value by reflexively shifting electricity use in response to the TSO's balancing needs, e.g. by charging batteries or turning off solar panels during periods of surplus. Centrica Business Solutions sends automated operating commands to electrical devices in response to signals from the TSO within the parameters set by the end-users of the devices. This is done by remotely connecting the device to our balancing platform via an app provided by the device manufacturer, installer or a third-party control hub. We can also adapt energy use of optimised devices to take advantage of price changes in wholesale energy markets.

3 What personal data do we process?

Personal data is data that relates to an identifiable individual, e.g. the energy account holder or end-user of a device being optimised by our balancing platform. We may process the following types of personal data:

- The unique electricity supply point number for a property. This is not the same as the electricity meter code or customer account number.
- Grid coordinates and/or address of the property where the optimised devices are installed.
- Unique identifier of devices being controlled by Centrica.
- Electricity consumption and charging (or discharging in case of solar panels) patterns of optimised devices associated with a particular electricity supply point.

- Other device telemetry (such as grid voltage or temperature) that help with forecasting electricity usage or generation or can help with steering and/or detecting issues with the device.
- The savings, balancing related credit allocations of optimised devices associated with a particular electricity supply point.
- Preferences set by the users on install or through an app use to configure the device, e.g. an energy tariff price.

The above data types will only constitute personal data as defined in the GDPR to the extent we hold it together with other information that would allow us to directly or indirectly identify the end-user or where identification is a reasonable likelihood. We might not process all the data types listed for a particular device or set of linked devices.

This will depend on the requirements of the TSO and the nature of the device. As the energy account holder or end-user of the optimised device, you are not obliged to provide any of the above data. Please note that if you do not, you may not be able to use our services. We may also process non-personal data, including constraints relating to the site where optimised devices are installed, e.g. maximum grid capacity, and specifications of optimised devices.

4 What do we use personal data for and why?

To the extent we process personal data, we do so for the following reasons:

To comply with a legal obligation

Reason or Purpose	Personal Data Types
Complying with the conditions of our industry operating licences and associated industry regulation and codes, including reporting supply point identifiers, location and consumption data to TSOs; storing and disclosing data to meet reporting demands of industry regulators and in response to regulatory investigations.	All
Assisting public bodies and agencies in the event of a request and where there is a legal duty to do so.	All Potentially

To pursue a legitimate interest

Reason or Purpose	Personal Data Types
Providing products and services, including connection with optimised devices and transmitting control signals; monitoring device performance; refining balancing performance through machine learning and demand modelling; allocating credits; calculating savings.	All
Visualising device usage and performance in web portal or app.	All
Configuring and managing settings and metadata in a web portal or app.	All
Monitoring and evaluating the ongoing performance of the balancing service platform, including through machine learning.	All
Service and product development, including developing, testing, trialling, evaluating and implementing improved balancing services, software and related products.	All

Analysing and modelling electricity consumption and demand as well as other industry related research.	2 and 3
Defence and exercise of legal claims.	Potentially all
Complying with the conditions of our balancing service operating licences and associated industry regulation and codes as well as disclosure requests public bodies and agencies in so far as a legal obligation does not apply.	Potentially all

We may anonymise and aggregate any of the personal data we hold. We may use anonymised and aggregated information for purposes that include testing our technology and balancing systems, research, data analysis and improving and developing new products and services.

5 Where do we obtain personal data?

To the extent we process personal data, we obtain it via automated transfers from:

- The platform or app controlling the optimised devices. The controlling app or platform may be provided by the device manufacturer, installer or third-party supplier of a control hub.
- Gateways connected to the devices, either directly or through a local network.

6 Who do we share personal data with?

To the extent we process personal data, we may share it with the following categories of recipient:

- Centrica group companies.
- Transmission System Operators and Distribution System Operators.
- Industry regulators and policy makers.
- Operators of platforms and apps through which end-users connect their devices to our balancing platform, including manufactures and installers of optimised devices.
- Suppliers we use to support our IT infrastructure, products and services.

7 International transfers of personal data

Centrica Business Solutions is part of a global organisation and in common with other organisations use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our customers are located. This includes countries outside the European Economic Area ('EEA') and to countries that do not have laws that provide specific protection for personal data. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement or other officially recognised mechanism which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

8 How long do we keep personal data?

We will retain any of your personal data we may have for as long as necessary to achieve the processing purposes.

9 Your rights over your personal data

You have the following rights over any of your personal data we process:

- To be informed about the personal data we collect, how your personal data is being used and where we obtain it.

- To access the personal data we hold about you.
- To request the correction of inaccurate personal data we hold about you.
- To request the blocking or deletion of your personal data in certain circumstances.
- To request that we port elements of your data either to you or another service provider in certain circumstances.
- To object to us processing your personal data, a) where we are relying on a legitimate interest and your rights override that interest; b) where we process it for the purpose of direct marketing, or c) because we are using automated means to make decisions that have a legal or similarly significant effect.
- To withdraw your consent to those processing activities which we carry out on the basis of consent. You only have the benefits of some of the above rights in limited circumstances, which depend on the legal reason why we collected your personal data. To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details below.

Contact

You can contact Centrica's data protection officer at privacy@centrica.com If you are unhappy with the way we are using your personal data you can also file a complaint with your national data protection regulator. We would be grateful if you would contact us first as we may be to resolve your complaint ourselves.