

# VINCI Energies UK & RoI Privacy Policy

This privacy policy sets out how VINCI Energies UK Holding Limited and its subsidiaries (Axians Networks Limited and Nouveau Solutions Limited) uses and protects your personal data, including any data you may provide when you use our website, purchase a product or service, sign up for a newsletter or take part in a competition.

## 1. Who are we

VE UK & RoI Group is made up of different legal entities. This policy is issued on behalf of the VE UK & RoI Group so when we mention “we”, “us” or “our” in this privacy policy, we are referring to the relevant entity responsible for processing your data. We will let you know which entity will be the controller of your data when you purchase a product or service with us.

## 2. Scope

This policy applies to any data subjects who might come into contact or engage with any entity of the VE UK & RoI Group, including employees, customers, contractors or third parties who may work on our behalf.

## 3. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

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

<b>Identity Data</b>	Includes name, username, marital status, title, date of birth and gender
<b>Contact Data</b>	Includes billing address, delivery address, email addresses and telephone numbers
<b>Technical Data</b>	Includes internet protocol (IP) address, your login data, browser type and version,
<b>Profile Data</b>	Includes your interests, preferences, feedback and survey responses
<b>Usage Data</b>	Includes information about how you interact with and use our website, products and services
<b>Marketing &amp; Communications Data</b>	Includes your preferences in receiving marketing from us and our third parties and your communication preferences

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals’ Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve our website and our service offerings.

## 4. How your personal data is collected.

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

- Your interactions with us.
  - This includes personal data provided by you when:

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- applying for our products or services;
  - subscribing to our services or publications;
  - requesting that marketing be sent to you;
  - entering a competition, promotion or survey; or
  - giving us feedback or contact us.
- Automated 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 and other similar technologies. Please see our Cookie Policy [<https://www.axians.co.uk/cookies/>] for further details.
- Technical Data from third parties.
  - We may receive personal data about you from various third parties as set out below:
    - Analytics providers such as Google based outside the UK;
    - Advertising networks; or
    - Search information providers.

You may request changes to your personal information or preferences by emailing [privacy@vinci-energies.co.uk](mailto:privacy@vinci-energies.co.uk).

## 5. How we use your personal data

### Legal Basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following:

1. Consent
  - We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to a newsletter.
2. Performance of a contract
  - Where we need to perform a contract we have entered into or are about to enter into.
3. Legitimate interests
  - We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests which can include fraud prevention and to enhance the customer experience. We make sure that any potential impact on you is balanced against the legitimate interest we may have before processing your personal data. We do not use your personal data for activities where your interests are negatively impacted unless we have your consent or are otherwise permitted by law to do so.
4. Legal obligation

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- We may use your personal data where it is necessary for compliance with a legal obligation to which we are subject. We will identify the relevant legal obligation where we rely on this legal basis.

## 6. Purposes for which we will collect and use your personal data

We collect and use your personal data only for the following reasons:

- To register you as a new customer
  - To direct contact details to the correct contact person or department
  - To respond to queries that you may raise
  - To **perform a contract with you**
  - In line with our **legitimate interest**
- Website use and improvements
  - To make browsing our website easier
  - To ensure the security of our website
  - To assess and improve the website and any services we may offer
  - In line with our **legitimate interest** to improve our website and enhance the user experience
- Compliance with legal and regulatory obligations
  - To ensure we comply with our **statutory and regulatory obligations**
  - To respond to your requests adequately

## 7. Direct marketing

During the process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from the VE UK & RoI Group. You will receive marketing communications if you have requested information from us or purchased goods and services from us and have not opted out of receiving such communications.

## 8. Opting out of marketing communications

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting [privacy@vinci-energies.co.uk](mailto:privacy@vinci-energies.co.uk)

If you opt out of receiving marketing communications, you may still receive service-related communications which are essential for administrative or customer services purposes, such as order confirmations or product warranty information.

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## 9. Third-party marketing

We will get your consent before we share your personal data with any third party for their own direct marketing purposes.

## 10. Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on [wehttps://www.axians.co.uk/cookies/](https://www.axians.co.uk/cookies/)

For further information about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.com](http://www.allaboutcookies.com).

You can set your browser to not accept cookies. The above websites can provide more detail on how to remove cookies from your browser. Note that not all features of our website will function as a result of disabling cookies.

## 11. Disclosure of your personal data

We may share your personal data only where necessary for the purposes set out in the table above. We require that any third party to whom we disclose your data respects the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for a specified purposes and in accordance with our instructions.

## 12. International transfers

We do not anticipate that we will transfer your personal data outside of the UK.

If it is necessary to transfer your personal data to service providers that carry out certain functions on our behalf, we ensure a similar degree of protection is afforded by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; and
- We may use specific standard contract terms approved for use in the UK which gives the transferred personal data the same protection as it has in the UK.

## 13. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, including purposes 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 of the relationship between us and you.

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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 and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

For example, by law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances, you can request that we delete the personal data we hold about you. See the next section for further information.

## 14. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to request:

- Access to your personal data via a “Subject Access Request”. This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.
- Correction of the personal data we hold about you in the event it is incomplete or inaccurate.
- Erasure of your personal data in certain circumstances. We may not always be able to comply with your request for specific legal reasons which will be notified to you at the time of your request.
- Objection to processing of your personal data where we are relying on a legitimate interest to process it. Although in some cases, your right to object may be overridden by compelling business interests.
- Opt-out of processing your personal data for direct marketing purposes.
- Withdrawal of consent any time where we rely on consent as a legal basis for processing.
- Restriction of processing of your personal data. This enables you to ask us to suspend processing your personal data in one of the following scenarios:
  - If you want us to establish the data’s accuracies;
  - Where our use of the data is not in compliance with the legal basis, but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish us to exercise any of the rights set out above, please contact [privacy@vinci-energies.co.uk](mailto:privacy@vinci-energies.co.uk).

### No Fee

You will not have to pay a fee to access your personal data (or to exercise any of the rights listed above). However, we are entitled to 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.

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## **What we may need from you**

We may need to confirm your identity and ensure your rights under this policy. This is a security measure to ensure that personal data is not disclosed to any person who does not have a right to receive it. We may also contact you to ask for further information in relation to your request.

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, including changes to your email address or postal address.

## **Time limit to respond**

We aim to respond to all legitimate requests within one (1) month or sooner. Occasionally it may take us longer if your request is complex or you have made a number of requests. We will notify you if this is a case and keep you informed.

## **15. Third party links**

This website may include links to third-party websites, plug-ins and applications. By clicking on those links or enabling those connections, third parties may collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **16. Queries and complaints**

If you have any questions or complaints about your personal data, you can write to the Director of Legal & Governance at Unit 2050, The Crescent, Birmingham Business Park, Birmingham B37 7YE or send an email to [privacy@vinci-energies.co.uk](mailto:privacy@vinci-energies.co.uk).

If you are not satisfied with the way we have handled your personal data or your rights under this policy, you can make a complaint any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues at [www.ico.org](http://www.ico.org).

## **17. Changes to the Privacy Policy**

We keep our privacy under regular review. This version was last updated on 13<sup>th</sup> May 2024.