

UK UTILITY LTD

## GDPR AND ANTI-BRIBERY POLICY



**Version:** 3.2 **Date:** [Current Date] **Approved by:** [Your Name], Chief Executive Officer **Effective Date:** [Original Effective Date]

### Amendment History:

- **V1.0 (01/02/2018)** : Initial version, aligning with the GDPR implementation date.
- **V2.1 (31/05/2020)** : Updated to reflect changes in UK Data Protection Law and revised policies.
- **V3.0 (01/07/2022)** : Updated to include specific guidance on Energy Information Sharing Protocol and expanded Anti-Bribery measures.

**Purpose:** This GDPR and Anti-Bribery Policy outlines UK Utility Ltd's (the "Company") commitment to protecting personal data, respecting customer rights, preventing bribery and corruption in its business dealings, and ensuring compliance with the relevant laws and regulations of the United Kingdom.

### Scope:

1. This policy applies to all employees, directors, consultants, contractors, and third-party partners of the Company.
2. The policy also applies to any individual or organization providing services on behalf of UK Utility Ltd.
3. This policy aligns with the following UK laws and regulations:
  - **General Data Protection Regulation (GDPR)** : EU's primary law for data protection since 2018, applicable in the UK after Brexit.
  - **Data Protection Act 2018** : The UK legislation implementing GDPR into domestic law.
  - **The Bribery Act 2010** : An Act of Parliament making bribery a criminal offense in the United Kingdom.
  - **The Energy Information Sharing Protocol (EISP)** : A protocol allowing energy companies to share customer information for billing purposes.

### Personal Data Protection (GDPR):

1. **Data Controller:** UK Utility Ltd is a data controller for the purposes of GDPR, collecting, storing, and processing customers' personal data in connection with their energy supply arrangements.
2. **Data Protection Principles:**
  - We will process personal data fairly, lawfully, and transparently (Article 5(1) GDPR).
  - Data will be accurate, up-to-date, and not kept for longer than necessary (Article 5(3) GDPR).

- Personal data will be stored securely and protected from unauthorized access (Article 32 GDPR).

### 3. **Personal Data Collection:**

- UK Utility Ltd collects customer information through online forms, paper applications, phone calls, emails, and in-person conversations.
- The Company will only collect personal data that is reasonably necessary for its business purposes, such as contact details, payment history, energy consumption patterns, and marketing preferences.

**Rights of Customers:** Customers have the following rights under GDPR:

1. **Right to be Informed (Article 12-14 GDPR)** : Customers have the right to access their personal data, request corrections or deletions, and object to certain processing activities.
2. **Right to Rectification (Article 16 GDPR)** : Customers can request UK Utility Ltd to rectify any inaccuracies in their personal data.
3. **Right to Erasure (Article 17 GDPR)** : Customers have the right to request the deletion of their personal data, subject to our records retention policies.

### **Energy Information Sharing Protocol (EISP):**

1. **Purpose:** The EISP allows UK Utility Ltd to share customer information with other energy companies for billing purposes.
2. **Consent:** We will only share customer data in accordance with their consent (Article 6(1)(a) GDPR).
3. **Security Measures:** All parties involved will adhere to adequate security measures to prevent unauthorized access to shared data.

### **Anti-Bribery Policy:**

1. **Definition:** Bribery includes the offer, promise, or delivery of money, goods, services, or other benefits in order to gain improper advantage.
2. **Prohibition:** UK Utility Ltd prohibits bribery and corruption by its employees, contractors, and third-party partners (Section 6(3) Bribery Act 2010).
3. **Bribery Prevention Measures:**
  - Regular training for employees on this policy and the Bribery Act 2010.
  - A clear whistleblower procedure allowing concerns about potential bribery to be raised confidentially (Schedule 7, Section 12 Bribery Act 2010).
  - Close scrutiny of business practices and relationships with clients, suppliers, and third parties.

### **Key Responsibilities:**

1. **All Employees:** Comply with this policy, GDPR, and relevant laws; report suspicious behavior to management; respect customer rights.

2. **Management and Supervisors:** Enforce compliance with this policy and related regulations among their teams; provide training on bribery prevention.
3. **Compliance Officer:** Oversee the implementation of this policy across the company, including reporting concerns or incidents.

**Consequences:**

1. Non-compliance with GDPR may lead to customer complaints, fines from regulatory authorities (up to £17 million), or reputational damage.
2. Employees engaging in bribery will face disciplinary action up to and including dismissal (Section 9(3) Bribery Act 2010).
3. Repeat offenders, whether employees or external parties, may also be prosecuted under the Bribery Act 2010.

**Amendments:** This policy will be reviewed annually and updated as necessary to reflect changes in relevant laws, regulations, and company practices.

**Acknowledgement:**

All employees, contractors, and third-party partners are expected to read, understand, and comply with this GDPR and Anti-Bribery Policy.