

Privacy Notice – Consumer App (Intouch and Comfort Touch App)

Version 1.0 – August 2018

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

the Dutch limited liability company **Intergas Verwarming B.V.** (Dutch Chamber of Commerce number 04068371) P.O. Box 6, 7740 AA Coevorden, The Netherlands ("**Intergas Heating**", "**we**" and "**us**") collects, uses and is responsible for certain personal information ("**personal data**") about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

Information collected by us from you and how we use it

In the course of providing our App (and related content/services provided through the App) to you and through your use of our App we collect and process the following personal information for the purposes we describe below.

Information you give us in order to use the App

If you use our App Intergas Heating processes the following (personal) data received from you:

- Boiler Type
- Serial Number
- Name
- Address (2 lines)
- City
- Postal Code
- Date of installation
- E-mail address
- Phone number (landline and/or mobile)
- IP address
- Installer Company information

Information the App collects and processes automatically

In addition through your use of the App we have access to information about the operation of your thermostat and central heating system including how you use your heating (together **heating boiler data**) as follows:

"**Thermostat data**" refers to the measured temperature in the home and the temperature selected. That data is called up from your thermostat. The thermostat data is used to monitor your central heating system and to explain any deviations in energy consumption. The thermostat data is transmitted to Intergas Heating via the central heating system. Intergas Heating makes the thermostat data available to the installer if you permit this.

“**Central heating system data**” comprises the system status, error messages, energy consumption, and temperatures of the central heating system, as well as of sensors in the appliance, meter readings such as operating hours, and general sensor values. That data is called up via your central heating system. Intergas Heating makes the central heating system data available to the installer if you permit this.

Purposes of the processing

Intergas Heating needs to process this personal data to enable Intergas Heating to provide the right information and digital content (including data) to you (the user (**User**) of the App) through the App and to contact you regarding the App and / or the Intergas Heating products [you are using] and their operation and support/maintenance as well as to enable you and relevant installers to be in contact with each other and / or with Intergas Heating.

Information collected from other sources

We also obtain personal information from other sources as follows:

- From installers - see [the joint controller privacy statement of Intergas Heating and its installer](#).

Who we share your personal information with

The personal data that we acquire from you or through the use of the App (including heating boiler data) will only be shared with the following persons:

1. The installer who you have given permission to do so. If you give an installer permission to access your personal data then the joint controller privacy statement of Intergas Heating and the installer is applicable which can be viewed [here](#).
2. Group companies of Intergas Heating, including our UK branche Intergas Heating Ltd.
3. Subcontractors engaged by Intergas Heating to carry out specific work that is not carried out by Intergas Heating itself

Intergas Heating has concluded agreements with or will conclude agreements with these third parties that meet the requirements of the GDPR.

[We may also share your personal information with interested parties in connection with any sale of, or investment in, our business or transfer of any of our assets.]

We may share personal information with law enforcement or other authorities if required by applicable law or where necessary for us to protect your vital interests or those of another person.

Whether information has to be provided by you, and if so why

The provision of information via the App is required from you to enable us to communicate with you via the App (and where you permit this to have installers contact you) and for us to provide the data and services we make available via the App. If you do not wish to provide this information then we will not be able to provide the App and related services to you. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

How long your personal information will be kept

Intergas Heating will keep personal data relating to the use of the App until the first to occur of:

- a. you (the data subject) deletes his/her user account within an App; or
- b. a user account is inactive for a period of 24 months. A user account is inactive during the period when no use is made of the App and/or the related gateway and central heating system have been offline continuously for 24 months.

Reasons we can collect and use your personal information

We rely on the following lawful bases to collect and use your personal information to the extent each is relevant to the processing in question:

- For our legitimate interests and those of our installers in providing the App and in providing any requested services and information through it, and keeping you informed about our products, their operation and safety and dealing with your queries. These activities benefit both us and you and are considered to be in both our interests and we only collect and process information necessary for these purposes.
- In order to enter into and/or perform a contract to which you are a party
- In order to comply with the law

We may also rely on your consent as the lawful basis processing where the law requires us to obtain consent (e.g. certain categories of electronic marketing).

Transfer of your information out of the EEA

We don't transfer your personal information outside the European Economic Area (EEA).

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information that this Privacy Notice is already designed to address
- access to your personal information and to certain other supplementary information
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- withdraw your consent to our processing where we are relying on consent as the lawful basis for the processing in question

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

- let us know the information to which your request relates

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 20-08-2018 and last updated on 20-08-2018.

We may change this privacy notice from time to time, when we do we will inform you by placing an updated copy on our website or otherwise informing by email or other means of communication.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us OR please send an email to our UK branche Intergas Heating Ltd: intouch@intergasheating.co.uk, write to Unit 2, Easter Park, Worcester Road, Kidderminster, DY11 7AR or call 01527 888000.

If you prefer to send an email to Intergas Verwarming B.V., you can send an email to: comforttouch@intergasverwarming.nl, write to Postbus 6 - 7740 AA Coevorden, The Netherlands or call us at 0031 524 - 512345