

Joint Privacy Statement

Background

This is a joint Privacy Statement by Intergas Verwarming B.V. and Intergas Heating Ltd (Jointly: “**Intergas**”) and your Installer (“**Installer**”) pursuant to Article 26 of the EU’s General Data Protection Regulation (the “GDPR”) and when we refer to “we” or “us” we mean the three of us. It confirms that Intergas and the Installer jointly determine the purposes and means of processing of your personal data relating to Intouch and Comfort Touch, informs you of the essence of the arrangement between Intergas and the Installer, and provides you with transparency as to how Intergas and the Installer will process your personal data for the purposes described in this Privacy Statement. This Privacy Statement supplements any privacy notices Intergas or the Installer may separately issue to you and addresses the situation where Intergas and the Installer are joint controllers of your personal data.

What this Privacy Statement covers and your rights in relation to it

We are aware that you place trust in us. We therefore see it as our responsibility to protect your privacy and to explain how we do that. This Privacy Statement tells you what information we collect when you use our joint products and/or services, why we collect that information, and how we use it to improve our services and your user experience. It also sets out your rights in relation to your personal data. Your rights in relation to the personal data covered by this Privacy Statement can be exercised against either or both of Intergas and the Installer.

Installer and Intergas hereby declare as follows:

Section 1: Definitions

Data Subject:	A natural person whose Personal Data is processed by Installer and/or Intergas.
Services:	Installation, maintenance, and repair of central heating systems.
Personal Data:	Any information relating to an identified or identifiable natural person within the meaning of Article 4(1) GDPR;
Controller:	The legal entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data within the meaning of Article 4(7) GDPR.
Regulation:	The General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).
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 via the central heating system. Intergas makes the thermostat data available to Installer where the Data Subject consents.
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 makes the central heating system data available to Installer where the Data Subject consents.

Section 2: Personal Data processed by Installer

2.1 Installer will only process the following Personal Data of a Data Subject:

- a. First name or initials;
- b. Surname;
- c. Street and house number;
- d. Postcode and town/city;
- e. Phone number (landline or mobile);
- f. E-mail address;
- g. Thermostat data (see also Section 1);
- h. Central heating system data (see also Section 1);

Section 3: Purposes and basis of/for processing Personal Data by Installer

3.1 Installer will only use the Personal Data referred to in Section 2.1 for the following purposes:

- a. Scheduling and making arrangements for activities relating to the Services;
- b. Collecting technical information on maintenance, malfunctions, malfunction frequencies, and repairs to Intergas appliances;

3.2 Installer will only process the Personal Data referred to in Section 2.1 for the purpose of performing its contract with the Data Subject.

Section 4: Personal Data to be provided to Intergas

4.1 Installer will only provide the following Personal Data of a Data Subject to Intergas:

- a. First name or initials;
- b. Surname;
- c. Street and house number;
- d. Postcode and town/city;
- e. Phone number (landline or mobile);
- f. E-mail address;

4.2 Installer will notify Intergas of any changes to the above Personal Data, including termination of the contract between Installer and the Data Subject.

4.3 Intergas Verwarming B.V. gathered the Thermostat data and Central heating system data itself to facilitate use of its app(s). This data isn't provided by Installer.

Section 5: Purposes and basis of/for processing of Personal Data by Intergas

5.1 Intergas Verwarming B.V. will only use the Personal Data referred to in Section 2.1 for the following purposes:

- a. to facilitate use of the app(s) offered by Intergas Verwarming B.V. for operating a central heating system;
- b. to provide technical support to Intergas Heating Ltd.
- c. for technical analysis of the central heating system data and thermostat data in order to improve and continue to develop the product.

- 5.2 Intergas Heating Ltd will only use the Personal Data referred to in Section 2.1 for the following purposes:
- to provide user support to the end-user and technical support to Installer;
- 5.3 Intergas Verwarming B.V. will process the Personal Data referred to in Section 2 in order to perform a contract with the Data Subject, in so far as the Data Subject uses an Intergas Verwarming B.V. app and as part of the legitimate interests of both Installer in performing Services for the Data Subject and Intergas Verwarming B.V. in improving and continuing to develop its products.
- 5.4 Intergas Heating Ltd will process the Personal Data referred to in Section 2 as part of the legitimate interests of Installer in performing Services for the Data Subject.

Section 6: Provision of Personal Data to third parties by Installer

- 6.1 Installer will only provide the Personal Data referred to in Section 2.1 to the following third parties:
- to Intergas in accordance with the provisions of Section 4.1.

Section 7: Provision of Personal Data to third parties by Intergas

- 7.1 Intergas Verwarming B.V. will only provide the Personal Data referred to in Section 2.1 to the following third parties:
- Subcontractors engaged by Intergas to carry out specific work that is not carried out by Intergas itself;
 - Group companies within the Intergas group.

Section 8: Retention periods for Personal Data

- 8.1 Installer will only retain the Personal Data referred to in Section 2.1 for the term of its contract with the Data Subject.
- 8.2 Intergas will only retain the Personal Data referred to in Section 2.1 until:
- the Data Subject deletes his/her user account within an Intergas app; or
 - 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 Intergas app and/or the gateway and central heating system have been offline continuously for 24 months.

Section 9: Rights of Data Subject

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 against either or both of the Installer and Intergas, please:

- email, call or write to one or both of 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

The Data Subject should be aware that objecting to the processing operations referred to in this Privacy Statement or requesting the deletion of Personal Data may result in Installer or Intergas no longer being able to perform the contract concluded with the Data Subject or to provide the Services.

Section 10: 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.

Section 11: Changes to this privacy notice

This Privacy Statement 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.

Section 12: General

12.1 Installer and Intergas will process the Personal Data referred to in this Privacy Statement in accordance with the Regulation and to the extent applicable the Data Protection Act 2018.

12.2 Installer and Intergas will protect the Personal Data referred to in this Privacy Statement in accordance with the Regulation and to the extent applicable the Data Protection Act 2018.

Section 13: Contact details of Controllers

13.1 Any questions regarding this Privacy Statement should be directed to your Installer or to Intergas Heating Ltd or to Intergas Verwarming B.V.:

Intergas Heating Ltd:

Address: Unit 2, Easter Park, Worcester Road, Kidderminster, DY11 7AR

Phone: 01527 888000 / E-mail: intouch@intergasheating.co.uk

Intergas Verwarming B.V.:

Address: PO Box 6 - 7740 AA Coevorden

Phone: 0031 524-512345 / Email: comforttouch@intergasverwarming.nl