

Privacy notice: Demand Side Response (also known as Intelligent Energy Management)

1 Demand Side Response and your personal data

This privacy notice applies when we process personal data of home energy customers who use electrical devices remotely optimised via our Demand Side Response platform. It extends our Energy and Smart Meters privacy notices and should be read in conjunction with them.

The notice explains our use of your personal data in relation to our Demand Side Response service and to trials of new Demand Side Response services. The controller of your personal data for these services and trials is British Gas Trading Limited ('we', 'us', 'our' or 'British Gas'), part of the Centrica group.

The manufacturer or operator of the optimised device or of the home control hub or app will be the controller of any personal data it collects and processes in its own devices, apps or hubs.

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 or, if significant, communicated to you directly.

2 What is Demand Side Response?

Transmission System Operators (TSOs) operate the high-voltage electricity distribution networks, usually nationally. 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. In addition, the Distribution System Operators (DSOs) operate and balance the lower-voltage distribution networks regionally across England, Scotland and Wales.

Demand Side Response allows customers to benefit from cheaper energy by reflexively shifting electricity use from periods of high to low demand in response to the system operators' balancing needs as well as to changes in wholesale energy prices, e.g. by charging devices or turning off solar panels during periods of surplus or using devices when wholesale electricity prices are lower. This is achieved by our Demand Side Response platform sending automated commands to smart devices (within boundary conditions set by the customer or device end-user) in response to signals from the systems operators or in response to energy market trading. The Demand Side Response platform connects to the devices via our Hive app, the device manufacturer's app, e.g. for vehicle chargers, or via third-party home control apps and hubs.

3 What personal data do we process?

Personal data is data that can be linked to an identifiable individual, e.g. the energy account holder of the device being optimised by our Demand Side Response platform.

We may process the following types of personal data:

- Your British Gas account details, e.g. account number, supply address, contact details, tariffs including Smart Export Guarantee tariff, billing and payments.
- The unique electricity supply point number (also known as the MPAN number) and address of the property where the optimised devices are installed.
- Half-hourly meter readings together with the electricity consumption, state of charge of battery and charging/discharging patterns of the optimised devices.
- Identifiers of the optimised devices or control hubs, e.g. manufacturer's reference number, hub ID, internet connectivity data or account number as well as data relating to the status,

settings and specifications of optimised devices, e.g. on/off status, max/min usage limits, charging or use time parameters.

- Cost and credit allocations relating to the electricity use of optimised devices.
- Any other information you provide to us when registering for, or connecting to, Demand Side Response services and trials.

We might not process all the personal data types listed for a particular device or set of linked devices. This will depend in part on the technical requirements of the device or control app.

You are not obliged to provide any of the above personal data, but please be aware that if you do not you may not be able to use Demand Side Response.

4 Why do we use personal data?

Where we process personal data because of our contract with you:

Reason or Purpose	Personal Data Types
Providing Demand Side Response services and trials, including connecting with optimised devices and transmitting control signals; monitoring device performance; refining balancing performance, allocating credits to your account.	All
Remedying issues if we cannot control your device charging or use by sharing data with the device or hub manufacturer or operator.	2, 3, 4 and 6

Where we process personal data to comply with a legal obligation:

Reason or Purpose	Personal Data Types
Complying with all applicable laws, the conditions of our industry operating licences and associated industry regulation and codes, including reporting supply point identifiers, location and consumption data to the Electricity System Operator and DSOs; storing and disclosing data to meet reporting demands of industry regulators.	All
Audits and regulatory investigations	Potentially all depending on the remit of the audit or investigation.
Assisting law public bodies and agencies in the event of a request and where there is a legal duty to do so.	Potentially all depending on the demand.

Where we process personal data because we have a legitimate interest in doing so :

Reason or Purpose	Personal Data
Assessing your eligibility for Demand Side Response services or trials	1 and 6
Participating in network balancing with the Electricity System Operator and DSOs, including transmitting control signals to optimised devices and reporting on device optimisation to Electricity System Operator and DSOs.	2, 3, 4 and 5

Monitoring and evaluating the ongoing performance of the balancing service platform and refining balancing performance, including through machine learning.	2, 3 and 4
Developing services and products, including developing, testing, trialling, evaluating and implementing new and enhanced services, software and products.	All
Analysing and modelling electricity consumption and demand as well as other industry related research.	2 and 3
Offering you tailored products and services to help you manage your energy use.	All
Establishing, defending and exercising of legal claims.	Potentially all depending on claim.
Complying with the conditions of our balancing service operating licences and associated industry regulation and codes as well as disclosure requests from industry regulators, public bodies and agencies in so far as a legal obligation does not apply.	Potentially all depending on the request.

We may anonymise and/or aggregate any of the personal data we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our technology and balancing systems, research, data analysis, improving and developing new products and services.

5 Where do we obtain personal data?

We obtain personal data:

- Directly from you, e.g. when you register for Demand Side Response services or trial.
- Centrica systems, e.g. where we link to your customer account when registering your for Demand Side Response services or trials.
- The manufacturer or hub operator when you connect your smart devices to our Demand Side Response platform via the manufacturer or operators' app or hub.
- Directly from the device or hub manufacturer, installer or operator, e.g. to confirm device suitability for the trial of a new product.

6 Who do we share personal data with?

We may share personal data with the following categories of recipient:

- Centrica group companies.
- Electricity system operators, e.g. the Electricity System Operator (the UK TSO) and DSOs such as UK Power Networks as well as bodies created to facilitate electricity market reform, e.g. the ERM Delivery Body, and providers of energy markets flexibility platforms.
- The original equipment manufacturer of your device, e.g. Dimplex, Mixergy.
- Installers/providers of apps and home control hubs through which you connect your devices to our Demand Side Response platform, e.g. Samsung SmartThings App.

- Energy industry regulators and policy makers, e.g. Ofgem.
- Suppliers we use to support our IT infrastructure, products and services.
- Any competent law enforcement agency, regulator, court or official body acting under legal authority.

7 International transfers of personal data

British Gas Trading Limited 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 UK to countries that do not have laws that provide specific protection for personal data. Where we transfer personal data outside of the UK to a country not determined by the UK Government as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the UK, such as the UK Government's approved international data transfer agreement and UK addendum.

8 How long do we keep personal data?

We will retain your personal data for as long as necessary to achieve the processing purposes.

9 Your rights over your personal data

You have the following rights in relation to your personal data:

- 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 rely on a legitimate interest to do so 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 the Information Commissioner's Office. We would be grateful if you would contact us first as we may be to resolve your complaint ourselves.

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