



Indigo Networks Limited

Privacy Policy

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1. Introduction and Purpose

Indigo Networks includes the separately licensed businesses Indigo Pipelines Limited and Indigo Power Limited. This privacy policy describes how we use your personal information in each company.

Last updated on 25th March 2024. Please refer to the end of the policy for copies of gas archive and electricity archive policies.

2. Who we are.

Gas Customers	Power Customers
If you are a gas customer, your personal information is processed by Indigo Pipelines Limited (company registration number 02742721) ("we"/"us"/"our"). We are the data controller in relation to your personal data. Our contact details are as follows. If you have questions about this privacy notice, please contact us using these details:	If you are a power customer, your personal information is processed by Indigo Power Limited (company registration number 12159646) ("we"/"us"/"our"). We are the data controller in relation to your personal data. Our contact details are as follows. If you have questions about this privacy notice, please contact us using these details:
E-mail: enquiries@indigopipelines.co.uk	E-mail: enquiries@indigopower.co.uk
Post: 200 Brook Drive, Green Park, Reading, RG2 6UB	Post: 200 Brook Drive, Green Park, Reading, RG2 6UB
Telephone: 0118 436 2510	Telephone: 0118 436 2510

3. Data collection and usage

Indigo Power

- 3.1 We are an independent electricity distribution network operator. We are regulated by Ofgem and are responsible for safely enabling the supply of electricity through our local networks to residential and commercial properties across the UK. We install, operate and maintain electricity supplies lines (which connect our customers across the UK to the main electricity grid) ("the Services"). We do not sell electricity to customers directly but ensure that it is safely and efficiently delivered to our customers through our electricity supply networks.

We will collect, store and use your personal information in certain circumstances in the course of carrying out the Services. Further details are set out in the table below.

Certain types of personal information are more sensitive than others. "Special information" about you includes information about health, disability, race, ethnicity, criminal offences (or alleged offences), political opinions, biometrics or religion. We will collect and processes special information about you in the course of carrying out the Services. We have identified here the types of special information we will collect or receive, and how and why it will be used.

Your information will be shared with some third parties, as is set out in more detail below.

What data we collect	How we use your data	Why we use your data
<p>We collect and receive data relating to consumers who are Priority Service Users, including:</p> <ul style="list-style-type: none"> • Name; • Meter Point Administration Number (MPAN); • Password; and • Details of priority service type, which can include information about the consumer's health, or that of others in the household. 	<p>We collect this data from you in order to provide the Services to you.</p>	<p>This processing is necessary for our compliance with our legal obligations as an independent distribution network operator. In addition, it is in our legitimate interests, as it enables us to carry out the Services. We use data about consumers' priority service type (including health data):</p> <ul style="list-style-type: none"> • Where the consumer has given explicit consent to us in relation to the use of this data for these purposes.
<p>We collect data from consumers in the course of carrying out the Services. This data may be obtained directly from the consumer, or through a third party such as the Metering Point Registration Service (MPRS), Data Communications Company (DCC) and relevant suppliers including:</p> <ul style="list-style-type: none"> • Name; • Contact details (e.g. address, telephone number and email); • Electricity consumption data; and • Meter Point Administration Number (MPAN); 	<p>The data is collected and used by us in order to carry out the Services.</p> <p>We may share some of this information with the relevant third parties described in the Information we share section below.</p>	<p>This processing is necessary for our compliance with our legal obligations as an independent distribution network operator. In addition, it is in our legitimate interests, as it enables us to carry out the Services.</p>

<p>Information when you communicate with us whether in person, through our website or via email, over the phone, or via any other medium, including:</p> <ul style="list-style-type: none"> • Your contact details; • The details of your communications with us (including when you sent it, when we received it and where you sent it from (such as our website, via email)); • The details of our messages to you. 	<p>We use this information to:</p> <ul style="list-style-type: none"> • Answer any issues or concerns; • Monitor customer communications for quality and training purposes. 	<p>This processing is necessary for our compliance with our legal obligations as an independent distribution network operator. In addition, it is in our legitimate interests to deal with and keep records of consumer communications. It is also in our legitimate interests, as it enables us to carry out the Services.</p>
<p>Information that we collect from individuals representing organisations with whom we deal in the course of carrying out the Services, including:</p> <ul style="list-style-type: none"> • Contact details of individuals working for organisations; • Other personal information regarding such individuals. 	<p>We use this information to:</p> <ul style="list-style-type: none"> • Enable us to carry out the Services; and • Build relationships with other organisations; 	<p>It is in our legitimate interests to:</p> <ul style="list-style-type: none"> • Develop and maintain relationships with vendors, partners and other companies; and • To deal with individuals who work for them.

<p>Information that we collect through your use of our website including:</p> <ul style="list-style-type: none"> • Device information such as operating system, unique device identifiers, the mobile network system; • Hardware and browser settings; • Date and time of requests; • The requests you make; • The pages you visit and search engine terms you use; • IP address. 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • Identify issues with the website and user's experience of it; and • Monitor the way our website is used (including locations it is accessed from, devices it is accessed from, understanding peak usage times and analysing what functionality and information is most and least accessed). 	<p>It is in our legitimate interests to monitor the way our website is used and identify issues with it.</p>
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Indigo Gas

3.2 We are an independent gas transporter. We are regulated by Ofgem and are responsible for safely transporting gas through our networks to over 203,000 residential and commercial properties across the UK. We develop, operate and maintain local gas transportation networks ("the Services"). We do not sell gas to consumers but ensure it is safely and efficiently delivered to consumers on behalf of gas suppliers.

We have appointed SSE Utility Solutions Limited, which trades under the brand SSE Enterprise, to carry out the Services on our behalf. SSE Enterprise (on our behalf) will receive, store and use personal information relating to consumers in certain circumstances in the course of carrying out the Services on our behalf. Further details are set out in the table below. We will collect, store and use your personal information directly in the circumstances set out below. Certain types of personal information are more sensitive than others. "Special information" about you includes information about health, disability, race, ethnicity, criminal offences (or alleged offences), political opinions, biometrics or religion. SSE Enterprise (on our behalf) receives and processes special information about consumers in the course of carrying out the Services. We have identified here the types of special information SSE Enterprise (on our behalf) will collect or receive, and how and why it will be used. Your information will be shared with some third parties, as is set out in more detail below.

What data we collect	How we use your data	Why we use your data
<p>We collect and receive data relating to consumers who are Priority Service Users, including:</p> <ul style="list-style-type: none"> • Name; • Meter Point Administration Number (MPAN); • Password; and • Details of priority service type, which can include information about the consumer's health, or that of others in the household. 	<p>We collect this data from you in order to provide the Services to you.</p>	<p>This processing is necessary for our compliance with our legal obligations as an independent distribution network operator. In addition, it is in our legitimate interests, as it enables us to carry out the Services. We use data about consumers' priority service type (including health data):</p> <ul style="list-style-type: none"> • Where the consumer has given explicit consent to us in relation to the use of this data for these purposes.
<p>SSE Enterprise (on our behalf) collects data from consumers in the course of carrying out the Services on our behalf, including:</p> <ul style="list-style-type: none"> • Name. • Contact details; and • Meter point reference number; 	<p>The data is collected and used by SSE Enterprise in order to carry out the Services.</p>	<p>This processing is necessary for our compliance with our legal obligations as an independent gas transporter. In addition, it is in the legitimate interests of us and SSE Enterprise, as it enables SSE Enterprise to carry out the Services on our behalf.</p>
<p>Information when you communicate with us whether in person, through our website or via email, over the phone, or via any other medium, including:</p> <ul style="list-style-type: none"> • Your contact details; • The details of your communications with us (including when you sent it, when we received it and where you sent it from (such 	<p>We use this information to:</p> <ul style="list-style-type: none"> • Answer any issues or concerns; • Redirect your query to SSE Enterprise and/or other entities within the SSE Group; and • Monitor customer communications for quality and training purposes. 	<p>This processing is necessary for our compliance with our legal obligations as an independent gas transporter. In addition, it is in our legitimate interests to deal with and keep records of consumer communications. It is also in the legitimate interests of us and SSE Enterprise, as it enables SS Enterprise to carry out the Services on our behalf.</p>

<p>as our website, via email);</p> <ul style="list-style-type: none"> • The details of our messages to you. 		
<p>Information that we collect from individuals representing organisations with whom we deal in the course of carrying out the Services, including:</p> <ul style="list-style-type: none"> • Contact details of individuals working for organisations; • Other personal information regarding such individuals. 	<p>We use this information to:</p> <ul style="list-style-type: none"> • Enable us to carry out the Services; and • Build relationships with other organisations; 	<p>It is in our legitimate interests to:</p> <ul style="list-style-type: none"> • Develop and maintain relationships with vendors, partners and other companies; and • To deal with individuals who work for them.
<p>Information that we collect through your use of our website including:</p> <ul style="list-style-type: none"> • Device information such as operating system, unique device identifiers, the mobile network system; • Hardware and browser settings; • Date and time of requests; • The requests you make; • The pages you visit and search engine terms you use; • IP address. 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • Identify issues with the website and user's experience of it; and • Monitor the way our website is used (including locations it is accessed from, devices it is accessed from, understanding peak usage times and analysing what functionality and information is most and least accessed). 	<p>It is in our legitimate interests to monitor the way our website is used and identify issues with it.</p>

4. Legal requirements

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims. We will not

delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

5. How long do we keep your information

We will keep your information for as long as it is reasonably necessary. We will also retain your information as necessary to comply with legal, accounting or reporting requirements. We will also routinely refresh our information to ensure we keep it up to date.

6. Information we share

Indigo Power

- 6.1** There are certain circumstances in which we transfer your personal data to employees, contractors and to other parties.
- We will share your information with contractors, engineers, and other technical consultants/professionals/service providers when we are required to do so in order to perform the Services (e.g. where we need to engaged specialist engineers to repair or maintain parts of our electricity supply network due to damage or equipment failures).
 - We are required to share information about your metering point with the Meter Point Registration Service (MPRS). The MPRS is a centralised UK system (operated by the 14 main Distribution Network Operators (DNOs)) for managing the lifecycle of your metering point, right from creation, to change of electricity supplier, and through to ultimate disconnection.
 - We will share your information with EP-Tech Limited, who are responsible for developing, hosting, and managing the software used to operate and communicate with the MPRS system.
 - We are obliged to share information about your smart meter with the Data Communications Company (DCC). The DCC is responsible for operating the UK's centralised smart metering communications infrastructure to send and receive information from smart meters to energy suppliers, energy network operators and energy service companies.
 - We will share your information with relevant regulatory and government bodies where we are under a legal obligation to do so (e.g. with Ofgem, the Secretary of State, the Gas and Electricity Markets Authority, etc).
 - We may share your information with other parties and stakeholders that operate in the electricity supply network where this is necessary to provide the Services to you, or where we are under a legal obligation to do so. This may include Electricity Suppliers, Meter Asset Providers, Meter Operators, Data Collectors, the Data Communication Company, Data Aggregators, Market Domain Data (a centralised repository of reference data used by electricity suppliers), and Supplier Volume Allocation Agents. The way we share with others is mainly through a Meter Point Administration System (MPAS) we must use in order to comply with our strict licence requirements. The MPAS we use is a standard licensed piece of software used by all or virtually all electricity industry participants.
 - We share information about you as necessary with other companies in our group, which provide administrative, board, corporate governance, accounting services and IT services to us.

- We also share your information with certain contractors or service providers who process your personal data for us. They include IT suppliers, database providers, backup and disaster recovery specialists, email providers, outsourced call centres and emergency services providers.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this Privacy Policy. Our personal information may be transferred to other third-party organisations in certain scenarios:

- If we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.
- Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

Indigo Gas

6.2 There are certain circumstances in which we transfer your personal data to employees, contractors and to other parties.

- As explained above, SSE Utility Solutions Limited (registered in England and Wales No. 06894120 and whose registered office is No.1 Forbury Place, 43 Forbury Road, Reading, Berkshire, RG1 3JH), trading as SSE Enterprise, carries out the Services on our behalf. SSE Enterprise is a member of the SSE Group, the parent company of which is SSE plc. The SSE Group is a major utilities company with many years of experience building and operating public gas networks. SSE Enterprise is responsible for maintaining our network and employing the resources required to address any problems. SSE Enterprise processes personal data about customers in order to carry out our operations and network administration on our behalf;
- We share information about you as necessary with other companies in our group (including Indigo Pipelines Holdco 2 Limited), which provide administrative, board, corporate governance, accounting services and IT services to us.
- We also share your information with certain contractors or service providers who process your personal data for us. They include IT suppliers, database providers, backup and disaster recovery specialists, email providers, outsourced call centres and emergency services providers.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in

connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this Privacy Notice. our personal information may be transferred to other third party organisations in certain scenarios:

- If we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

7. Where your information will be held

We do not transfer your personal data outside the United Kingdom.

8. Your rights

You have certain rights in relation to your information. The availability of these rights and the ways in which you can use them are set out below in more detail. Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact us on the details given below.

- **Access:** you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal information. This enables you to receive a copy of the personal information we hold about you and certain other information about it.
- **Correction:** you are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected.
- **Erasure:** you are entitled to ask us to delete or remove personal information in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.
- **Restriction:** you are entitled to ask us to suspend the processing of certain of your personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Transfer:** you may request the transfer of certain of your personal information to another party.
- **Objection:** where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims.

- Automated decisions: We do not make any automated decisions. However, if we did, you would have the right to contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.

If you want to exercise any of these rights, please contact enquiries@indigopipelines.co.uk.

You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident where we are based or where an alleged infringement of Data Protection law has taken place. In the UK you can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at www.ico.org.uk).

9. Right to object

You have a right to object to us processing your information in certain circumstances.

Objection: where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims.

You can ask us to stop processing your information at any time. In certain circumstances we may not be able to do this or may not be required to do this. For example, if the information is relevant to legal claims.

10. Cookies

We use cookies that identify your browser or device. They collect and store information when you visit our website about how you use it. For more information about cookies, the types of cookies we use and how we use them please see our Cookie Policy.

11. Security

We are committed to keeping your personal information safe. We've got physical, technical, and administrative measures in place to prevent unauthorised access or use of your information.

12. Links to third party websites

Our website, newsletters, email updates and other communications contain links to and from the websites of others.

The personal data that you provide through these websites is not subject to this privacy notice and the treatment of your personal data by such websites is not our responsibility. If you follow a link to any of these websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy notices of entities through which you chose to share.

13. Children

We do not knowingly collect information from children or other persons who are under 18 years old, though information we receive on Priority Service Users may include information about children. If you are under 18 years old, you may not submit any personal information to us or subscribe for the services. If you believe we might have any personal information from or about a person under the age of 18, please contact us on the details given below.

14. How to contact us.

If you have any questions about this policy, please contact:

