

Our customers are at the centre of everything we do at OVO. So as well as providing you with great value and excellent service, we're committed to protecting your privacy.

When we refer to OVO, we, us or our in this privacy policy we refer to HTG Home Services Limited trading as OVO. HTG Home Services Limited is registered in Scotland (Company No. SC358475). Registered Office: 4th Floor Saltire Court, 20 Castle Terrace, Edinburgh, EH1 2EN.

What's in this policy

1. Our Contact Details
2. Why do we have a privacy policy?
3. Changes to our privacy policy
4. Dealing with your personal information
 - 4.1 Collecting your personal information
 - 4.2 Using your personal information
 - 4.3 Disclosing your personal information
 - 4.4 Protecting your personal information
 - 4.5 How long we'll keep your personal information
 - 4.6 Your legal rights
5. Automated decision-making
6. Cookies
7. Personal data processing activities we carry out

1. Our contact details

Our Data Protection Officer (DPO) can be contacted using the email address shown below. If you have any questions about the way we handle your personal information, please get in touch and we'll help.

For queries, access to your data, or to delete your data, please email: support@hometree.co.uk

If you have any data protection complaints, you're able to contact the [Information Commissioner's Office](#) (ICO). We'd like to try and help with any concerns you may have before you contact the ICO, so please get in touch with us in the first instance.

2. Why do we have a privacy policy?

We'll collect certain personal information from you when you use our website, write to us or call. The purpose of our privacy policy is to let you know:

- How and why we collect your personal information
- How we use and disclose your personal information (and to whom)
- How we protect your personal information
- Your legal rights and how the law protects you

3. Changes to our privacy policy

If we make material changes to our privacy policy, we'll post changes on our website and then we'll write to you to let you know.

4. Dealing with your personal information

4.1 Collecting your personal information

We collect certain personal information from you, which is any information which might identify you. The information we collect includes:

- **Contact data:** your name, email address, postal address, phone number, and any other relevant information we need in order to contact or identify you.
- **Financial data:** your bank account and payment details.
- **Technical data:** internet protocol (IP) address, your login data (if we've supplied login data to you), browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. We track technical data by using cookies – see section 6 below for more details on cookies.

- **Usage data:** information about how you use our website, products and services.
- **Marketing and communications data:** your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special categories of data:** health and financial vulnerability data, if applicable, to allow us to provide appropriate service.

We also use aggregated data, in order to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity. It's really important that the personal data we hold about you is up to date so please let us know if your personal data changes at any time.

When will we collect it?

We (and our agents) collect certain personal information from and about you during your sign-up journey and when you get in contact with us or use our website or as part of providing our services to you. We may also monitor and record any communications we have with you, including phone calls and emails, to make sure we are providing an excellent service.

4.2 Using your personal information

We'll only use your personal information where we're allowed to by law. Generally, this will be under one or more of the following circumstances:

- To perform our contract we have or will have with you
- It's necessary for us to run our business and give you the best possible service
- Where we need to comply with a legal or regulatory obligation; and/or
- For marketing purposes where you have agreed to us using your personal data, see the "Marketing Information" section below for more information.

For more detail on how we use your personal information see the table in section 7 of this privacy policy.

Contacting you

We'll contact you by the method we've agreed with you.

Marketing information

We might send you marketing information we think you'd be interested in, about OVO, our partners or other companies in the Hometree Group. We'll only do this when we have a legal justification for doing so. The information could be by email, letter, phone, or SMS. If you've opted out of receiving direct marketing from us, we won't send you any. If you choose to be contacted, we might use your personal information to tell you about exciting new products and services from OVO, our partners or other companies in the Hometree Group. We might also use any personal data you've shared with us to show you digital adverts on social media, search engine results pages, or other websites. If you want to change your marketing preferences, you can let us know by calling us. If you opt out of receiving marketing from us, we might share your personal data, including your updated preferences, with third parties, such as our marketing agencies. This is to make sure you don't receive any marketing from those third parties.

We'll delete your details if you ask us to, but we'll keep a record of your contact details (name, address and email) on our "Do not contact" register to make sure we don't contact you in future.

If you take part in any of our "Refer a friend" offers, you agree that you'll only contact anyone who's interested in hearing about our services and wants to

benefit from the offer. We won't contact anyone you've sent a referral offer to unless they contact us.

If you decide to leave us, we might market our products and services for up to one year after you've left.

You can update your preferences or opt out of this at any time by clicking unsubscribe on any emails we send or by calling us.

4.3 Disclosing your personal information

We may allow the following types of organisations to use personal information we hold about you for the purposes set out in section 7 below, including:

- **Service providers** who provide engineering services, industry data collection and aggregation, IT and system administration services
- **Marketing agencies** to provide you with information about our products and services or other products and services which may be of interest to you (provided you've given your consent) and to help manage any reward or loyalty schemes
- **Price comparison sites** which might take your details where you decide to request a quote or switch to us through that site
- **Debt collection agencies**
- **Professional advisers** such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- **Regulators and other authorities** who we need to report to about what we're doing with your personal data in certain circumstances
- **Insurance underwriters** who underwrite the insurance products

Our third parties who only process data on our behalf won't use your personal data for their own purposes and we only permit them to use it in accordance with our instructions and the law.

Disclosing information outside the EU

Sometimes the organisations listed above may be outside the European Economic Area (EEA), so we may pass your personal information to countries that do not have the same standards or protection for personal information as the UK. If we, our agents or our service providers do this, we'll always make sure that these organisations adequately secure your personal information.

Appropriate service or additional needs

If we believe that you or a member of your household need extra care (for example, because of your age, health, disability or financial circumstances) and we have your explicit consent to do so, we may record and share this information with trade professionals (those who carry out repairs and servicing) to allow us to provide the appropriate level of service.

4.4 Protecting your personal information

We follow strict security procedures to protect your personal information. This includes following certain guidelines, for example, checking your identity when you phone us.

We strongly recommend that you do not disclose any login details to anyone.

From time to time, our website may provide hypertext links to sites which are created by individuals and companies outside of OVO. We do this if the site is relevant to the topic you're reading about. Whilst we always try to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, or the accuracy or relevance of the content on them.

4.5 How long we'll keep your personal information

When deciding on how long to retain your personal information for, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and any applicable legal requirements.

We keep your personal information:

- for as long as you have an account with us or use our Service (including if you enter a prize draw, competition, or other promotion) in order to meet our contractual obligations to you, and
- for up to seven years after that to comply with our legal and regulatory requirements, identify any issues, and resolve any legal proceedings.

We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

4.6 Your legal rights

You have various rights in relation to your personal information. These rights are as follows:

- **Request access to your personal information:** you can request a copy of the personal information we hold on you.
- **Request correction of your personal information:** if any personal information we hold on you is incorrect, you can request to have it corrected.
- **Request erasure of your personal information:** you can ask us to delete your personal information in certain circumstances.
- **Object to processing or restrict processing of your personal information:** you may object to our processing of your personal data in certain circumstances.
- **Request the transfer of your personal information:** to provide you, or a third party you have chosen, with your personal information.
- **Withdraw consent where we're relying on consent to process your personal information:** if you withdraw your consent, we may not be able to provide certain products or services to you. We'll advise you if this is the case at the time you withdraw your consent.

To exercise your rights in relation to your personal information, please contact us via the addresses shown in Section 1 Our contact details.

You are able to exercise your rights free of charge, but if you make unfounded, repetitive or excessive requests, we may charge you to carry these out or refuse to act on such requests.

We'll try to respond to all requests within one month. If your request is complex or if you make lots of requests, we may extend our time to respond – if this is the case, we'll let you know.

5. Automated decision-making

We don't use automated decision making tools.

Our underwriters may use geographical data to determine if you are in a part of the UK we can cover and claim history data to set your premiums at renewal. If you have any questions, or you would like to find out more about our insurer's Data Protection and Privacy Policy you can write to: The Data Protection Officer, HTG Insurance Services Limited, PO Box 155, Mill Court, La Charroterie, St Peter Port, Guernsey, GY1 4ET.

6. Cookies

What are cookies?

A cookie is a piece of information stored in a small file which is sent to and from web pages. They can be used to identify that you've visited websites before and some will be stored on your computer by your web browser.

- You can find full details of OVO Energy's Cookie Policy on their website.
- You can find out how we use cookies below:

How do we use cookies?

We use cookies to understand how people use our websites and to help us to make your experience of our websites better.

Website

We use short-term cookies to recognise your PC as you move around our site and to remember any information you have entered into search boxes for the next time you visit us.

Measuring web traffic

We use programs such as Google Analytics to help us find out:

- How many people visit our websites
- Which pages are most popular
- How long people spend in each area
- What information they're searching for

These insights help us understand how to improve our websites.

Google Analytics uses cookies to collect non-personally identifiable information like:

- Browser types
- Operating systems
- Referring sites that sent you to us
- The dates and times of a visit

If you'd like to know more about Google Analytics, you can visit their [website](#).

We use cookies to monitor how the website is used so that we can identify what users are interested in and improve the overall user experience. Some of

these cookies are set by third party web analytics companies such as Google Analytics.

Cookies are used on our website for 3 purposes:

- Managing the website's functionality and user experience
- Monitoring performance
- Advertising and tracking

We use tools to place our ads on other websites you may visit. These tools may set cookies to track the performance of our advertising campaigns and allow us to tailor the advertising you might be interested in.

We use products like Google Ads. These products help us understand what ads work best so we can more effectively promote our products and services to you.

We use Google Adwords Customer Match to help exclude our existing customers from seeing our ads, and to reach similar web users who could also be interested in joining us.

We use Experian to make the content and advertising shown on devices that you might use more relevant and useful. As part of this process Experian uses cookies and receives information about the kind of device you use as well as your IP address.

How can you manage or delete cookies and where can you find further information?

If you don't want us to use cookies in your web browser, you can remove them from your computer or change your browser settings so that it either blocks cookies altogether or asks you if you'd like to accept them from some websites.

Our full list of our cookies can be found below. Some of our cookies are essential for our websites to work properly.

The internet industry body, the Internet Advertising Bureau, has set up a [website](#) to provide information and advice on cookies, tags and behavioural advertising.

Changes to our Cookie policy

Any changes we may make to our Cookie Policy in the future will be posted on this page.

Cookies list

Category	Service/Providers	
Advertising	Advertising.com	Facebook Custom Audience
	AppNexus	Flashtalking
	DoubleClick	Google Adwords (various)
	DoubleClick Bid Manager	Google Dynamic Remarketing
	Experian	Facebook Custom Audience
Customer Interaction	Trustpilot	Live Chat
Essential	Google Tag Manager	Typekit by Adobe
Site Analytics	GA Audiences	Mixpanel
	Google Analytics	New Relic
	Hotjar	Visual Website Optimizer
Social Media	Facebook Connect	

7. Personal data processing activities we carry out

We (and our agents) may use your personal information for the following:

Activity	Data Type	Lawful Basis
Provide our services to you, including: • Setting up your account • Managing billing and payments • Market, arrange for the sales of and carry out certain administrative activities • Process and handle complaints	• Contact data • Financial data • Technical data • Marketing • Communications data • Special categories of data	• Performance of our contract with you • Necessary for us to run our business (e.g., to recover debts due) • Consent (to use special categories of personal data)
Carry out internal processes related to providing services to you	• Contact data • Financial data • Technical data • Marketing data • Communications data • Special categories of data	
Should you begin our sign-up process without completing it, or if you ask for a quote, we may reach out to help.	• Contact data • Technical data	• Necessary for us to run our business (to grow our business and provide assistance to you)
Provide you with incentives or run a loyalty scheme	• Contact data • Financial data • Technical data • Marketing data • Communications data	• Consent • Necessary for us to run and grow our business (to study how customers use our products or services, to develop them, and to inform marketing strategy)
Send information to you about goods or services that may be of interest to you	• Contact data • Financial data • Technical data • Marketing data • Communications data	
Create internal reports or profiles to analyse information for forecasting and marketing purposes	• Contact data • Financial data • Technical data • Marketing data • Communications data	• Necessary for us to run and grow our business (to study how customers use our products or services, to develop them, and to inform marketing strategy)
Request feedback on our services, such as through surveys.	• Contact data	• Necessary for us to run our business (to study how customers use our products or services and to provide you with the highest level of service)
Monitor and analyse calls and emails to support staff training and quality.	• Contact data • Call recordings	
Using data analytics to improve our website, services, and customer experience.	• Technical data	• Necessary for us to run our business (to define the target market for our products or services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Maintain and secure our business and website, including troubleshooting, data analysis, testing, and system support.	• Contact data • Financial data • Technical data • Marketing data • Communications data • Special categories of data	• Necessary for us to run our business (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation

OVO is a trading name of HTG Home Services Limited, a firm authorised and regulated by the Financial Conduct Authority under firm reference number 824122 to carry on insurance distribution.

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