CALOR

THE PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

Purpose/Use	Types of data processed	Lawful basis
To assess whether to accept you as a customer. For example, if you are a business customer, we will carry out credit reference checks before deciding whether to accept you as a customer. If you are a bulk tank or metered estate customer, we will review information, certificates and records relating to your tank before deciding whether to accept you as a customer. If you are a returning customer, we may review any historic data we still hold about you, including previous customer account data and your previous order and payment history.	• Identity Data • Contact Data • Customer Account Data • Communications Data • Financial Data • Third-Party Data (credit reference agency checks)	• Necessary for our legitimate interests
To assess whether to accept you as a supplier or business partner. If you are a business partner or supplier, we will carry out third-party due diligence checks including screening against publicly available government and/or law enforcement agency sanctions lists.	• Identity Data • Contact Data • Communications Data • Third-Party Data • Legal & Compliance Data We may process criminal offence data to the extent any is contained in any Legal & Compliance Data obtained/held.	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests
To assess whether to grant sponsorship or a charitable donation to you and to then grant the sponsorship or make the donation.	• Identity Data • Contact Data • Financial Data • Communications Data	• Necessary to comply with a legal obligation • Necessary for our legitimate interests

For example, we will need to verify that your charity or business is legitimate and carry out third-party due diligence checks.	• Third-Party Data • Legal & Compliance Data We may process criminal offence data to the extent any is contained in any Legal & Compliance Data obtained/held.	
To register you as a new customer.	• Identity Data • Contact Data • Customer Account Data • Financial Data • Vulnerability Data • Communications Data • Marketing Data We may process some special category data, such as health data, or Criminal Offence Data, if you are a vulnerable customer, to comply with our legal and/or regulatory obligations and best industry practice.	• Performance of a contract with you • Necessary to comply with a legal obligation • Consent (in respect of direct marketing consents only) • Necessary for our legitimate interests
To register you as a new supplier or business partner.	• Identity Data • Contact Data • Supplier & Business Partner Data • Financial Data • Communications Data • Third-Party Data • Legal & Compliance Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Consent (in respect of direct marketing consents only) • Necessary for our legitimate interests
To respond to your query, complaint or data protection request (if you are a member of the public who is not a customer, business partner or supplier). This includes queries or complaints	• Identity Data • Contact Data • Communications Data	• Necessary for our legitimate interests • Necessary to comply with a legal obligation (such as if your query or complaint concerns a safety or security

made via social media, Trustpilot or other review websites.	• Social Media Data (if the query or complaint has been made via social media) • CCTV Data (where this is directly relevant and it is necessary to view the CCTV in order to respond)	issue or so as to be able to respond to, address or resolve complaints or online posts and reviews concerning Calor's business)

If you are a customer, to manage your account and our relationship with you, such as:
 	
• sending pricing or safety communications or other service-related messages
• reviewing telemetry or gas consumption data and meter readings
• liaising with you as necessary to deal with:
  ○ account changes or updates
  ○ contract renewals or terminations
  ○ the service, maintenance and safety of tanks or other related equipment
  ○ any other queries you may have
• receiving and dealing with any complaints, including where these have been made via social media posts or on Trustpilot or other review websites
• dealing with any personal data requests.
 	
If you call us, we also record the call to manage our relationship with you (as well as for training and quality purposes as set out below).
	• Identity Data
	• Contact Data
	• Customer Account Data
	• Financial Data
	• Vulnerability Data
	• Communications Data
	• Third-Party Data
	• Marketing Data (if relevant to a query or complaint)
	• Location Data (if a query or complaint relates to a delivery or vehicle)
	• Social Media Data (if a query or complaint has been made via a public social media post)
	• CCTV Data (if this is relevant and it is necessary to view the CCTV in order to respond)
	• Site Access Data (if relevant and it is necessary to review this data in order to respond)
	
	We may process some special category data or criminal offence data if you are a vulnerable customer (to comply with our legal and/or regulatory obligations and best industry practice) or if this is directly relevant to your query or complaint.
		• Performance of a contract with you
		• Necessary to comply with a legal obligation
		• Necessary for our legitimate interests

If you are a supplier or business partner to manage our relationship with you, such as:
• sending routine business communications;
• liaising with you as necessary to deal with any aspect of our relationship including:
  ○ contract, supply, price or business changes and updates
  ○ contract renewals or terminations
  ○ breaches of contract
  ○ any other issues relating to the products or services you supply, our assets or our sites
• dealing with any queries, complaints or disputes.
	• Identity Data
	• Contact Data
	• Supplier & Business Partner Data
	• Financial Data
	• Communications Data
	• Third-Party Data
	• CCTV Data (if this is relevant)
	• Site Access Data
	• Legal & Compliance Data
		• Performance of a contract with you
		• Necessary to comply with a legal obligation
		• Necessary for our legitimate interests

To supply gas to customers (whether this is bulk gas or cylinders), provide any related or ancillary services and receive payment for the same. This includes: • taking, processing and delivering any order for bulk gas • taking, processing and delivering (or arranging delivery by way of a business partner or dealer) any order for cylinders • supplying, installing and uplifting tanks or cylinder installations or cages • servicing our cylinder or tank assets • providing related maintenance services • issuing invoices and statements • managing payments, fees and charges • collecting and recovering money owed to us.	• Identity Data • Contact Data • Customer Account Data • Financial Data • Vulnerability Data • Communications Data • Location Data	• Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)

To train and evaluate our employees. For example, if you call us, we record the telephone conversation for training and quality purposes. Our customer standards team and customer service managers may also review customer accounts and communications for training and quality purposes.	• Identity Data • Contact Data • Customer Account Data • Financial Data • Communications Data	• Necessary to comply with a legal obligation • Necessary for our legitimate interests (so we can evaluate and train our employees)
If you are a business partner or supplier, to perform the terms of our agreement with you, such as: • managing services, deliveries or collections • issuing invoices and statements • managing payments, fees and charges • collecting and recovering money owed to us	• Identity Data • Contact Data • Supplier & Business Partner Data • Financial Data • Communications Data • Third-Party Data • Location Data	• Performance of a contract with you • Necessary for our legitimate interests
If you are a business partner, to monitor your compliance with our agreement, policies, regulations and law. For example, we run third-party due diligence checks, check accreditations and may carry out test purchases (which may be recorded using body-worn cameras).	• Identity Data • Contact Data • Communications Data • Third-Party Data • Legal & Compliance Data • CCTV Data We may process criminal offence data to the extent any is contained in any Legal & Compliance Data obtained/held or which is captured in CCTV Data.	• Performance of a contract with you • Necessary for our legitimate interests • Recognised legitimate interest
To decide whether we should develop new products or services or to assess, analyse and improve our existing services.	• Identity Data • Contact Data • Customer Account Data • Technical Data	• Consent (where you consent to taking part in a market research survey) • Necessary for our legitimate interests

For these purposes we will usually group customers into certain categories and then analyse customer behaviour. Typically, we will aggregate this data to ensure anonymisation.	• Website Usage Data • Marketing Data • Social Media Data	
To send you marketing communications (such as Calor news, partnerships, competitions, offers or promotions) and make suggestions and recommendations to you about goods or services that may be of interest to you. We may continue to send marketing communications to you for a reasonable period of time after you have ceased to be a customer, supplier or business partner of Calor. We may also e-mail you as a past customer around two years after the date you left Calor (as this is when the contract you have with your new supplier will be up for renewal) to invite you to return to Calor.	• Identity Data • Contact Data • Customer Account Data • Technical Data • Website Usage Data • Marketing Data	• Consent (where we have obtained your prior consent to receiving direct marketing communications) • Necessary for our legitimate interests (to develop our products/services and grow our business and inform our market strategy)
To carry out market research. When processing personal data for market research purposes, we minimise personal data use as much as is possible to non-identifiable/anonymous and aggregated data. Where we collect sociodemographic information, this will only be used on an aggregated basis, to help inform research, marketing, and policy decisions.	• Identity Data • Contact Data • Customer Account Data • Technical Data • Website Usage Data • Marketing Data • Social Media Data	• Consent • Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

To enable you to partake in a prize draw, competition or promotion	• Identity Data • Contact Data • Technical Data • Website Usage Data	• Performance of a contract with you
To interact with you if you comment on a Calor social media post, or if you tag Calor in a post or comment. We may respond directly on social media as a direct message, a comment on your post or as a reply to your comment.	• Identity Data • Supplier & Business Partner Data • Social Media Data Whether you are a member of the public or a customer, we may also process such data as is necessary to address and respond to your complaint (see separate sections above).	• Performance of a contract with you (where applicable) • Necessary for our legitimate interests (to be able to respond to, address or resolve complaints or posts concerning Calor's business)
To respond to you if you leave a review on our Trustpilot page, or online reviews concerning Calor on any other websites. We may also respond to you directly on Trustpilot.	• Identity Data • Supplier & Business Partner Data (if the review has been left by a business partner or supplier). Whether you are a member of the public or a customer, we may also process such data as is necessary to address and respond to your complaint (see separate sections above).	• Performance of a contract with you (where applicable) • Necessary for our legitimate interests (to be able to respond to, address or resolve complaints or posts concerning Calor's business)
If you attend an industry or trade meeting or similar event that Calor has sponsored, we may review your details on any delegate lists and reach out to you (where you have opted in to share details with sponsors for follow up).	• Identity Data • Contact Data Communications Data	• Consent • Necessary for our legitimate interests
To administer our website, provide certain website functionality, improve website performance and to secure our website and underlying IT systems and network (including troubleshooting, data analysis,	• Technical Data • Website Usage Data • Marketing Data	• Necessary for our legitimate interests (for running our business, provision of administration and IT services, IT security, and to prevent fraud, to keep our website updated and relevant, to develop our

testing, system maintenance, support, reporting and hosting of data). We use cookies and data analytics to improve our website content, to deliver online advertisements to you and to measure or understand the effectiveness of our marketing and advertising. For example, we may analyse how often you visit our website, how long you stay on certain webpages, and which links you click on.		business and to inform our marketing strategy) • Consent (for use of non-essential cookies)
For internal business management purposes and for accounting and reporting purposes. For example, we process personal data if required to manage our assets and inventory, to conduct audits and investigations for finance and accounting purposes or to implement internal business controls, for archiving and insurance purposes, for legal and business consulting purposes and in the preparation and performance of management reporting and analysis.	• Identity Data • Contact Data • Customer Account Data • Communications Data	• Necessary to comply with a legal obligation • Necessary for our legitimate interests
For acquisition and divestitures purposes. For example, to decide how to structure, contract or condense our business, such as in the context of corporate re-structures, mergers, acquisitions and divestitures.	• Identity Data • Contact Data • Customer Account Data • Communications Data	• Necessary for our legitimate interests
To safely deliver products and services to our customers, to prevent, detect or investigate health and safety incidents or near misses and to protect the health and safety of our customers,	• Identity Data • Contact Data • Customer Account Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests

employees, suppliers, business partners and members of the public generally. For example, we may issue health and safety or recall notifications, or we may review Site Access Data, CCTV imagery or vehicle location technology if there is a health and safety incident on a Calor site or involving a Calor vehicle to properly investigate the incident and prevent this from reoccurring. In the interests of employee, public and customer safety, we may also carry out third-party due diligence checks on business partners and suppliers at any time, or we may investigate any business partner or supplier if we reasonably suspect that they are not operating their business safely or lawfully.	• Supplier & Business Partner Data • Financial Data • Site Access Data • CCTV Data • Legal & Compliance Data (in respect of business partners or suppliers) • Third-Party Data • Location Data For this purpose, we may process special category information, such as health data, or criminal offence data such as criminal activity or behaviour.	• Recognised legitimate interest
To ensure our tanks or cylinder installations are properly serviced and maintained or, if no longer in use, are uplifted or made safe. This might apply even if you have never been a customer of Calor or after you cease to be a customer of Calor, if a Calor owned tank or installation remains situated on your property.	• Identity Data • Contact Data • Customer Account Data (if you are or were a customer) • Communications Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests • Recognised legitimate interest
To enquire as to land ownership if we have assets (such as tank installations) on land you may own or if we know you are the landowner from publicly available records, to contact you about any installations on your land, or see if you are open to us placing assets on your land.	• Identity Data • Contact Data	• Necessary to comply with a legal obligation • Necessary for our legitimate interests

To protect the security of the public, our customers and employees, to protect the security of public and customer property and to protect the security of Calor assets, vehicles, sites, premises and property. For example, at our sites we use CCTV, access control systems, door entry systems and visitor logs to authenticate access rights. We also use vehicle cameras and vehicle technology so we can locate our vehicles at any given moment. We may also carry out third-party due diligence checks on business partners and suppliers at any time, or we may investigate any business partner or supplier if we reasonably suspect that they are not operating their business lawfully.	• Identity Data • Contact Data • Customer Account Data (such as gas usage) • Supplier & Business Partner Data • Financial Data • Communications Data • CCTV Data • Site Access Data • Location Data • Third-Party Data • Social Media Data (such as if an individual or business is wrongfully selling Calor assets by way of social media) We also record car registration numbers at all Calor sites. For this purpose, we may process special category information, such as health data, or criminal offence data such as criminal activity or behaviour.	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests • Recognised legitimate interest
To prevent, detect and investigate crime. For example, at our sites we use CCTV, access control systems, door entry systems and visitor logs to authenticate access rights. We also use vehicle cameras and vehicle technology so we can locate our vehicles at any given moment. We may review customer or supplier and business partner information as well as CCTV, Site Access Data and Location Data where we reasonably suspect criminal activity or wrong-doing or in the	• Identity Data • Contact Data • Customer Account Data • Supplier & Business Partner Data • Financial Data • Communications Data • CCTV Data • Site Access Data • Location Data • Third-Party Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests • Recognised legitimate interest

event our customers, employees or members of the public reasonably suspect, witness or experience criminal activity or wrong-doing. We may also carry out third-party due diligence checks on business partners and suppliers at any time, or we may investigate any business partner or supplier if we reasonably suspect criminal activity.	For this purpose, we may process criminal offence data such as criminal activity or behaviour.	
To comply with law and our legal obligations and to respond to regulatory body or law enforcement requests. For example, where we process personal data to comply with our health and safety, tax or regulatory obligations. We may also need to, or wish to voluntarily, disclose personal data to government institutions, regulatory bodies or other law enforcement bodies.	• Identity Data • Contact Data • Customer Account Data • Supplier & Business Partner Data • Financial Data • Vulnerability Data • Communications Data • Third-Party Data • Technical Data • Location Data • CCTV Data • Site Access Data • Legal & Compliance Data • Social Media Data	• Necessary to comply with a legal obligation • Necessary for our legitimate interests • Recognised legitimate interest
To protect our legal rights or to defend or commence: • formal alternative dispute resolution proceedings • legal proceedings or claims (whether civil or criminal)	• Identity Data • Contact Data • Customer Account Data • Supplier & Business Partner Data • Financial Data • Vulnerability Data • Communications Data • Third-Party Data	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests

	• Technical Data • Location Data • CCTV Data • Site Access Data • Legal & Compliance Data • Social Media Data	
To use images of customers, business partners or suppliers in internal and/or external communications (e.g. intranet, newsletters, social media, website).	• Visual Data	• Consent