Centrica and data from Mixergy hot water tanks

This notice applies to users of Mixergy hot water tanks, who have set their scheduling to "Standard" or "Economy".

If you have set your tank to either of these, Mixergy controls the scheduling. As part of its decisionmaking process, Mixergy attempts to help National Grid with "demand side response": a process of trying to level out the country's energy usage.

We — Centrica plc — help both National Grid and Mixergy with this, and this notice sets out how we process your personal data.

In summary, we receive an identifier for your Mixergy device and heating-relating updates (but nothing which lets us identify you directly, such as your name or address). We aggregate your device's information with information about other Mixergy devices, and we provide this combined data to the National Gird.

You can contact our data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD or by emailing privacy@centrica.com.

You can contact Mixergy by writing to Mixergy Limited, 2 Canal View, Wharf Farm, Eynsham Road, Cassington, Oxfordshire, OX29 4DB, or through its website, https://www.mixergy.co.uk/contact-us/.

1. Personal data we receive

If you have set your Mixergy device's scheduling to "Standard" or "Economy", Mixergy will transfer us the following data:

- **Mixergy device identifier:** a device number, which only Mixergy can relate back to your specific personal details. This is known as pseudonymised data.
- **Heating-related updates:** ongoing updates about your Mixergy device's heating activity, including its physical state and heating cycles.

Exercising your rights: irrespective of your scheduling settings, if you exercise any of your statutory rights under Data Protection Law, we will keep a record of this and how we respond, in most instances we envisage that the data we have, since it is not identifiable as yours in Centrica's hands, will be limited.

2. What we use your pseudonymised personal data for and why

Where we process your personal data because you have allowed us to

We process these items of your personal data when you have provided your consent to the processing through your settings in your Mixergy app. You may revoke your consent at any point by changing your scheduling setting to "Off".

Reason or purpose	Personal data used
Understanding the state of your hot water tank on a dynamic basis in order to calculate how to use it for National Grid services, and to send Mixergy control signals, which Mixergy sends on to your device	Mixergy device identifierHeating-related updates

Where we process your personal data because we have a legitimate interest to

We process these items of your personal data because we have a legitimate interest to do so. We process the following categories of personal data, including:

Reason or purpose	Personal data used
Providing aggregated information to National Grid for National Grid's administrative purposes to enable us to provide flexibility services	• We will combine heating-related updates from multiple Mixergy devices, so that the information we provided to National Grid is aggregated, and does not uniquely identify you.
Maintain accuracy and relevance of your data	All information
For the establishment, exercise or defence of legal claims	All information
Assist law enforcement agencies, and other public authorities	• The personal data processed for this purpose would depend on the scope of the enquiry, and will be limited to what is necessary to achieve the purpose of the request.

Where we process your personal data so you can't be identified any more

We may anonymise and 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 IT systems, research, data analysis, improving our site, apps and developing new products and services.

3. Sources we collect your personal data from

We will collect personal data from a number of sources. These include:

- Directly from you: when you communicate with us.
- **Mixergy (including its app, and your hot water tank):** when you configure your heating schedule to "Standard" or "Economy", we receive data from Mixergy.

4. Who we share your personal data with

We share personal data with the following parties:

Who	Examples
Companies in the same group of companies as us	Our parent company, Centrica Plc
Mixergy	
National Grid (but only anonymous, combined data)	
Any competent law enforcement body, regulatory, government agency, court or other third party	Ofgem

5. Transferring your personal data internationally

Centrica is a global organisation and in common with other organisations, we 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 European Economic Area ("EEA") and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission 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 EEA, such as the European Commission approved standard contractual clauses.

6. How long we keep personal data for

We will keep data about you for as long as you are sending data to us, and then for twenty-four (24) months.

We will keep heating-related updates for twenty-four (24) months from the date we receive the data from Mixergy.

7. Your rights in relation to your personal data

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

- the right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources (all of which is contained in this notice);
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the blocking or deletion of your personal data in some circumstances;
- the right to request that we port elements of your data either to you or another service provider;
- the right to object to us processing your personal data ((1) where we have a legitimate interest to do so, as listed in section 3, but your rights override ours based on your particular situation (which you will need to explain to us), (2) where we are processing it for the purpose of direct marketing, or (3) because we are using automated means to make decisions that have a legal or similarly significant effect); and
- the right to withdraw your consent to those processing activities which we carry out on the basis of consent, listed in section 3. You can do this at any time by setting the scheduling setting on your Mixery device to "off".

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.

As we do not receive any directly identifiable data about you from Mixergy, you may be better off going directly to Mixergy where possible. Otherwise, we will need you or Mixergy to provide us with the pseudonymous device identifier which relates to you.

8. Getting in touch

If you have any privacy-related questions or comments, please contact Centrica's data protection officer by writing to The Data Protection Officer, Centrica Plc, Millstream, Maidenhead Road, Windsor, Berkshire, SL4 5GD.

You can also contact our data protection officer at privacy@centrica.com.

If you are unhappy with the way we are using your personal data you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.