



## Data Retention Policy

This policy sets out the reasons behind and processes for Glowpower's storage of customer data as well as a process for requesting information be deleted (also known as the right to be forgotten).

Glowpower stores customer information safely and securely in our Dublin Hosting Facility, and data is encrypted. See our [Privacy Policy](#) for more details.

### Why do we collect your data?

We are required to collect and use data relating to You ("Personal Data") for providing you effective services as well as complying with legal and regulatory requirements. This includes Your name, address and contact details, information relating to your consumption of electricity and billing and payment data. Personal information may be transferred to the Distribution System Operator for the purpose of maintaining and operating supply to your premises. We may also disclose some or all Personal Data to another supplier in the event of a market failure involving a supplier default, to the Supplier of Last Resort designated by the Commission for Regulation of Utilities.

### G.D.P.R. Framework for collecting and using your data.

Under the General Data Protection Regulation (GDPR), an organisation that controls personal data is obliged to ensure that the data it controls has been "collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes" (Article 5(1)(b) of the GDPR). In other words, the organisation should not use the data in any way other than for the purpose it was collected.

### How long does Glowpower keep customer data?

The General Data Protection Regulation ("the GDPR") does not specify any particular retention period for personal data. However, Article 5(1)(e) of the GDPR states that personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Recital 39 of the GDPR also provides that the period for which personal data is stored is to be kept to a strict minimum, and that in order to ensure that personal data is not kept longer than necessary, time limits should be established.

Glowpower will retain customer specific data up to 3 years, or earlier at the customer's request. Information collected by Glowpower will be held for as long as it is required to fulfil the purpose it was collected for and to protect you and Glowpower. We are required to keep certain types of information for a specific period of time in order to comply with legal requirements. The length of time we keep any part of your personal information will depend on the type of information and the purpose for which it was obtained. We are obliged to keep records of customer consumption for up to 3 years so that customers can access this information. After 3 years, Glowpower will remove customer personal data, including any identifying personal data. See below for customer requests for the removal of data.



### Customer requests for Data to be removed. The 'right to be forgotten'.

Glowpower appreciates customer concern for data security. In certain circumstances, customers may have the right to have some or all personal data deleted from our records. This may occur if, for example, we retain data which is no longer required by us, or if you withdraw your consent.

If you continue to have a relationship with us (if we are the supplier for your property, or if there are financial reasons why we cannot delete your data (for example, you owe money to us), we will retain the data we need to manage your account.

### How to request for your data to be deleted.

Notwithstanding any of the reasons mentioned for which we maintain your data, you can write to us at [Customerservice@glowpower.ie](mailto:Customerservice@glowpower.ie) or call us, to have your personal data removed.

As there are technical and system issues surrounding any requests, these may take some time. You will be advised that your request has been acknowledged and we will provide reasons if we object to the deletion of any of your personal data.