

## 1. Introduction

- 1.1. This document details the OXIS Energy Ltd (OXIS) Privacy Policy in complying with the General Data Protection Regulation (GDPR).
- 1.2. OXIS values its staff, customers, partners and suppliers and is committed to protecting personal data.
- 1.3. OXIS will act as required by the laws and regulations that govern its operations on Data Protection.
- 1.4. This Privacy Policy aims to inform individuals how OXIS collects and processes personal data through interactions with the business.
- 1.5. It is important that this privacy policy is read and understood when working with OXIS so you are aware of how and why personal data is being used.
- 1.6. OXIS can be reached at [Privacy@Oxisenergy.com](mailto:Privacy@Oxisenergy.com) or contacted by writing to

Attention: Privacy  
OXIS Energy Limited  
E1 Culham Science Centre  
Abingdon  
Oxfordshire UK  
OX14 3DB

## 2. The Principles of the Data Protection Act

- 2.1. OXIS is dedicated to complying with the 8 principles of data protection.
  - 2.1.1.Principle 1: Fair and Lawful
  - 2.1.2.Principle 2: Purpose
  - 2.1.3.Principle 3: Adequacy
  - 2.1.4.Principle 4: Accuracy
  - 2.1.5.Principle 5: Retention
  - 2.1.6.Principle 6: Rights
  - 2.1.7.Principle 7: Security
  - 2.1.8.Principle 8: International

## 3. Data Controller

- 3.1. OXIS Energy Ltd is the data controller for oxisenergy.com, its staff, customers, contractors, suppliers, visitors and others where personal data is provided.

## 4. Lawful Basis for the use of Personal Data

- 4.1. Where required OXIS will collect personal data to meet our legal obligations, or under the terms of a contract, or as part of the legitimate interests of OXIS in conducting its business operations.
- 4.2. Where an individual fails to provide data when requested, OXIS may not be able to perform contractual obligations. Where this occurs OXIS will notify individuals of such incidents and may cancel the products or services affected.

## 5. Types of Personal Data collected by OXIS Energy

5.1. OXIS may collect and process the following types of Personal Data when undertaking its operations.

- 5.1.1. **Identity Data:** This may include first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- 5.1.2. **Contact Data:** This may include billing address, delivery address, email address and telephone numbers.
- 5.1.3. **Financial Data:** This may include credit reference agencies, credit checks, bank account and payment card details received at the point of transaction.
- 5.1.4. **Transaction Data:** This may include the details of products and services you have purchased from us and other details about payments to and from you.
- 5.1.5. **Technical Data:** This may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and platform.
- 5.1.6. **Profile Data:** This may include your username and password, purchases or orders made by you, feedback and survey responses, employment history, your interests and preferences that you have provided.
- 5.1.7. **Usage Data:** This may include information about how you use our website, products and services.
- 5.1.8. **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 5.1.9. **Special Category Data:** This may include race, nationality, ethnic origin, politics, religion, trade union membership, genetics, health.
- 5.1.10. **Personal Image:** This may include likeness from photos or video.

## 6. Monitoring

6.1. OXIS may monitor and record communications (such as emails) for quality assurance purposes or to prevent fraudulent activity. Any such monitoring will be carried out in accordance with GDPR and other relevant legislation.

## 7. How OXIS Energy collects Personal Data

7.1. OXIS may collect personal data using the following methods.

### 7.2. Direct interactions

7.2.1. OXIS may collect Identity, Contact, Financial Data, Transaction Data, Profile Data when voluntarily filling in forms or by corresponding with OXIS by post, phone, email or otherwise.

### 7.3. Automated technologies or interactions

7.3.1. OXIS may automatically collect Technical Data when individuals interact with the Company website and IT systems. This may include but is not limited to information about your equipment, browsing actions and patterns. OXIS collects this personal data by using Google Analytics, server logs and other similar technologies.

7.3.2. OXIS does not collect cookies from the website.

### 7.4. Third parties or publicly available sources

7.4.1. OXIS may receive personal data from various third parties and public sources as set out below:

- analytics providers;
- advertising;
- industry leaders;
- scientific and social networking providers;
- customer relationship management services;
- academic networks;
- webinars;
- online information;
- surveys;
- event ticketing and management services;
- web and email marketing providers;
- product comparison websites; and
- sales and marketing automation platforms.

7.4.2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

7.4.3. Identity and Contact Data from data brokers or aggregators.

7.4.4. Identity and Contact Data from publicly available sources such as Companies House, third party websites and the Electoral Register based inside the EU.

## 8. How OXIS Energy Processes Personal Data

8.1. OXIS shall process data in compliance with the GDPR regulations and as part of its lawful basis.

8.2. Where appropriate, we will ask for your consent to process the personal data, for example; in the case of marketing, or offering of voluntary benefits. Where you have given consent for processing activities, you have the right to withdraw your consent at any time. You are not obliged to give consent.

8.3. OXIS may use your personal data for a number of different lawful bases for the processing of personal data as appropriate to the purpose, e.g. next of kin information to protect the vital interests of the data subject.

8.4. OXIS shall use data for the following purposes:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	Identity, Contact, Profile	Contractual
Marketing at Trade Events	Identity, Contact, Profile, Usage	Legitimate interests in providing customer service
Financial transactions	Identity, Contact, Financial, Transaction, Marketing and Communications	Contractual, legal obligations, vital interests, pursuing legitimate interests in recovering payment owed
Communications about OXIS Energy; gathering feedback, customer relationships and experiences	Identity, Contact, Profile, Usage, Marketing and Communications	Contractual, legal obligations, legitimate interests, customer improvement activities
Business and website operations	Identity, Contact, Technical	Contractual, legitimate interests, legal obligations
Business Management (including but not limited to: human resources, customer relations, financial, IT services, logistics)	Identity, Contact, Financial, Transaction, Technical, Profile, Usage, Special Category Data, Personal Image	Contractual, legitimate interests, vital interests, consent, legal obligations

8.5. OXIS will only use personal data for the processes for which it is collected, unless OXIS has a reasonable requirement to process it for another reason that relates to the original process.

8.6. OXIS will contact individuals where the process deviates from and is not related to the original process unless where required by law.

8.7. Individuals can contact OXIS for more details about the lawful basis for each use.

## 9. How OXIS shares Personal Data

9.1. OXIS may share data with the following as part of its business management and operations:

9.1.1. Legal agencies;

9.1.2. Financial Agencies;

9.1.3. Persons providing services to OXIS;

9.1.4. OXIS staff members as part of its business operations;

9.1.5. Third parties where OXIS may sell, transfer, or merge part of the business assets. Where this occurs OXIS will notify all individuals may be affected;

9.1.6. Anyone else where OXIS has consent to do so or is required to do so by law.

## 10. Data Security and Access

- 10.1. Access to data will be limited to individuals who require the data to perform business operations as part of their roles. Contractors, agents and other third parties will only process personal data on OXIS instructions and will comply with confidentiality obligations under GDPR.
- 10.2. OXIS has put in place controls to manage and safeguard personal data. These include:
  - 10.2.1. Use of Firewalls;
  - 10.2.2. Anti-virus and malware protection;
  - 10.2.3. Encrypted laptops and mobile devices;
  - 10.2.4. Site to site VPN connections;
  - 10.2.5. Secure servers;
  - 10.2.6. Secure facilities.
- 10.3. Where transferring hard copy personal data OXIS shall ensure it is sent by secure post.
- 10.4. OXIS restricts access to personal information to those who need to know that information in order to process it for the company and who are subject to contractual confidentiality obligations;
- 10.5. OXIS requires its employees to adhere to this Privacy Policy.

## 11. Data Retention

- 11.1. OXIS shall retain data for as long as is required to conduct the processes for which it is collected and to meet its legal obligations, accounting requirements or reporting requirements.
- 11.2. By law OXIS is required to keep basic accounting information (including Contact, Identity, Financial Data) for a minimum of six years.
- 11.3. OXIS will maintain a list of data records, their retention period and the responsible parties.

## 12. Rights over Personal Data collected and processed by OXIS

- 12.1. Individuals have the following rights over personal data collected, processed and retained by OXIS.
  - Right to be informed
  - Right of access
  - Right to rectification
  - Right to erasure
  - Right to restrict processing
  - Right to portability
  - Right to object
  - Rights related to automated decision making including profiling
- 12.2. For further information on the rights listed in 12.1 above, see the official guidelines published by the Information Commissioners Office: [Link](#)
- 12.3. Individuals can enact their rights by contacting OXIS and where appropriate submitting a Subject Access Request.
- 12.4. OXIS will not charge an access fee unless the request is excessive, unfounded or repetitive but, alternatively in these circumstances OXIS may refuse to comply to with this request.
- 12.5. OXIS will respond to any subject access requests within one month. Where this target cannot be met due to the complexity of the request OXIS will communicate the delay and provide updates on progress.
- 12.6. OXIS retains the right to request clarification where Subject Access Requests are not clear. To ensure a faster response, individuals can:
  - 12.6.1. Put the request in writing;
  - 12.6.2. Include proof of identity;
  - 12.6.3. Clearly specify the nature of the request;
  - 12.6.4. Provide a signed declaration that the data requested pertains to the requester only;
  - 12.6.5. If acting through a third party, provide a declaration stating that the requester authorizes the third party to act on their behalf.
  - 12.6.6. Provide information on the relationship between the requester and third party and the contact information of the third party.

**13. Data Breach**

13.1. OXIS will comply with the GDPR regulations in the event that a Data Breach occurs.

**14. Policy Suspension**

- 14.1. In some instances, the Data Protection and Retention Policy may be temporarily suspended, specifically where an investigation, litigation, or audit is anticipated.
- 14.2. Suspension of the policy will be recorded as a document which details the data being accessed, the reason for the suspension, and signed by the Chief Executive Officer.
- 14.3. In some instances, this policy's disposal schedule may conflict with the need to produce documents relevant to the aforementioned legal or regulatory procedures. If this is the case, the need to comply fully with the law and/or regulation will override this policy, causing this policy to be temporarily suspended until the matter in question is satisfactorily resolved.
- 14.4. Suspension of this policy will take the form of no business documents being disposed of for a period of time.
- 14.5. Records of the suspension of this policy will be maintained by OXIS. The record will contain the following:
- Information on the requesting parties;
  - Information on the data requested;
  - Written agreement of Senior Management allowing access to the Personal Data.