

# Rowan Renewable Energy Ltd Privacy Policy

*Last Updated: 27 November 2024*

Rowan Energy is committed to safeguarding your data and handling it transparently, responsibly and securely. Rowan Energy is the data controller of the personal information you provide to us. As a data controller, we are responsible for ensuring that your data is handled in compliance with UK GDPR and the Data Protection Act (DPA) 2018. This privacy notice explains what personal information we collect, why we collect it, how we use it and your rights under UK GDPR.

## 1. Contact Details

If you have any questions about this privacy notice or your data protection rights, please contact us:

- **Telephone:** +44 345 053 1962
- **Email:** support@rowanenergy.com

## 2. What Information We Collect and Why

We collect personal information to deliver and improve our services, communicate with you, meet legal obligations and for other purposes detailed below. We only collect data that is necessary and relevant to each purpose.

- **To Deliver Products and Services to our customers**
  - **Data Collected:** Name, contact details, addresses, GPS location of the SmartMiner, payment information to facilitate payments using PayPal, WIFI information (for the operation of the SmartMiner which is saved locally on the device and not reported back to us), solar set up information (including details relating to the inverter, battery, PV array, and electricity metre)
  - **Purpose:** To perform our contract with you, deliver our products and services, and handle payments.
- **To Manage Customer Accounts and Guarantees**
  - **Data Collected:** Name, contact details, addresses, payment information and solar PV set up information, SmartMiner ID number.
  - **Purpose:** To support the operation of your account
- **For Service Updates and Marketing Communications**
  - **Data Collected:** Name, contact details and marketing preferences.
  - **Purpose:** To provide service updates or marketing information. We will only contact you with your explicit consent, which you can withdraw at any time.
- **To facilitate business operations and working with business partners**
  - **Data collected:** Name, contact details, job titles, roles, company name, company address, company payment details
  - **Purpose:** To perform our contract with our business partners (wholesalers, distributors, and installers) and fulfil our contractual obligations with our customers

### 3. Our Lawful Basis for Collecting and Using Your Data

Under UK GDPR, we are required to have a lawful basis for processing your personal information. We rely on different bases depending on the purpose of processing:

- **Contract:** For activities directly related to providing services or goods, such as account management, order fulfilment, and payment processing.
  - All data protection rights apply except the right to object.
- **Consent:** For marketing communications and service updates, we will obtain your consent before contacting you. You have the right to withdraw your consent at any time.
  - All data protection rights apply except the right to object. To withdraw consent, please contact us using the details above or click the unsubscribe link in any of our emails.
- **Legitimate Interests:** We process certain data, such as your anonymised solar generation data, based on legitimate interests. We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.
  - All data protection rights apply except the right to portability. Our legitimate interest is to promote environmentally sustainable practices and provide benefits through carbon offsetting initiatives.

### 4. Your Data Protection Rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases under UK GDPR. You can find out more about lawful bases on the ICO's website. Here's a summary of your rights:

- **Right of Access:** You have the right to request copies of your personal information, as well as information about where it was obtained and with whom it is shared. There are some exemptions which means you may not receive all the information you ask for.
- **Right to Rectification:** You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Right to Erasure:** You have the right to ask us to delete your personal information.
- **Right to Restrict Processing:** You have the right to request limitations on how we use your data in certain situations.
- **Right to Object:** You have the right to object to the processing of your personal data.
- **Right to Data Portability:** You have the right to ask that we transfer your data to another organisation or directly to you.
- **Right to Withdraw Consent:** When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you wish to exercise any of these rights, please contact us. We will respond without undue delay, within one month.

### 5. How We Collect Personal Information

We collect your data through various means:

- **Directly from you:** Through account registration, purchase transactions, and customer support interactions.
- **From trusted business partners:** From carefully selected business partners in the solar industry partners such as wholesalers, distributors, and installers involved in your SmartMiner installation.

## 6. How Long We Keep Your Information

We only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, or as required by law.

- **Account Information:** Retained as long as your account remains active and for up to 6 years thereafter, for audit and legal purposes.
- **Financial Transactions:** Retained for 6 years to comply with financial record-keeping obligations.
- **Marketing and Consent Records:** Retained until you withdraw consent or for as long as we provide service updates.

We periodically review the data we hold and delete or anonymise it where appropriate.

## 7. Who We Share Information With

To deliver services effectively, we may need to share personal data with third parties. We only share data with:

- **Service Providers:** Trusted service providers who assist with payment processing through card payments, bank transfer and PayPal, customer support ticketing system etc.
- **Trusted business partners:** carefully selected business partners in the solar industry partners such as wholesalers, distributors, and installers who are involved directly with your SmartMiner installation.

We ensure that all third-parties adhere to UK GDPR and treat your data with the same level of security.

### International Transfers

If we transfer data outside the UK, we will ensure it is protected by similar safeguards, using appropriate mechanisms such as standard contractual clauses approved by the ICO.

## 8. Security of Your Data

We are committed to protecting your data with robust technical and organisational measures, including encryption, secure data storage, and access controls. We regularly review and update our security practices to protect your information.

## 9. How to Complain

If you have any concerns about our handling of your personal data, please contact us directly. We will do our best to address your complaint promptly. If you are not satisfied with our response, you can escalate your complaint to the Information Commissioner's Office (ICO):

- **Rowan Energy's information:**
  - **Email address:** support@rowanenergy.com
  - **Phone number:** +44 345 053 1962
- **ICO Contact Information:**
  - **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
  - **Helpline:** 0303 123 1113
  - **Website:** [ICO Make a Complaint](#)

This privacy notice will be reviewed periodically and updated to reflect any changes in legal requirements or our data processing activities.