How we ensure your data is private

In compliance with UK and European data protection regulations, this privacy policy explains what personal information we collect from you when you visit our website or are a recipient of our services.

2-Switch Ltd is committed to processing any personal data or information about its staff, contractors, partners, clients and potential clients in ways that comply with its legal and regulatory obligations, and to being clear about what it does with their personal information.

This Privacy Policy and Cookie Policy together with our terms of use, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you.

We do update this Policy from time to time so please do review this Policy regularly.

Personal Data Collected

2-Switch Ltd are a broker of electricity, gas, water, merchant services and telecoms supply for businesses; mainly targeted at SME market. We provide competitive contract pricing and assist our SME clients in the set up or transfer of utility supply.

The data we collect to fulfil these services is almost entirely from business or non-personal individuals and will be processed for business purposes. However, as we target the SME market a high proportion of the data we collect, and process will be from Sole Traders or Partnerships, so we recognise our commitment to these clients under personal data regulations.

The personal information which we use will be taken when:

- You enquire to use our services through contact with our staff or from one of our referring partners.
- You contact us or use our website.
- You are a recipient of our services and information.
- You enquire, apply to join or work for 2-Switch Ltd.

We may collect the following types of information:

- Your name, business names and address, contact telephone number(s) and email address. For verification purposes we may also collect your DOB.
- Information required to provide you with a service (e.g. details of your existing utility supplier, contract expiry dates, meter readings and consumption’s, full electricity MPAN numbers and gas MPRN details).
- Website data including, but not limited to, traffic data, location data, weblogs and other communication data.
- Details of our services that you have used.

- Your payment or financial information such as credit or debit card details and bank account details.

2-Switch Ltd record all telephone calls that we receive and make. These recordings are necessary for our contract arrangements with our Utility Suppliers and for our own legitimate interests. The data is used for internal purposes to help us improve and deliver excellent customer service; for our own quality controls and to ensure fair and competitive offers are being made.

We do not collect any special category data for processing in our own right as a data controller.

Why Do We Collect this Information?

We collect your personal information:

- To provide you with utility services that you may request from us or as under contracted agreement.
- To provide information about goods and services which we feel may be of interest to you.
- For our legitimate interests in the relationship, we have with you as a business contact or client.
- To meet our legal and regulatory obligations as an employer and as a broker of utility services.
- For the safeguarding and care of our staff and guests.

How Do We Collect this Information?

We may collect personal information:

- **Directly from you**: e.g. when you apply to receive our services or enquire on our website.
- **From recorded telephone calls**; all calls are recorded as necessary for our energy suppliers or for our own quality controls and training.
- **Directly from our referring partners or data brokers** we make use of internet Pay Per Lead providers and referring partners to identify new or potential clients and purchase data from data brokers.
- **From publicly available sources:** e.g. social media, internet services.
- **From industry specialists** such as ECOES and Gas “Access data” but not exclusively, half hourly data readings and consumption’s, full electricity MPAN numbers and gas MPRN details, Authorise Supply Capacities, and meter information including smart metering.
- **Directly from our staff e**.g. when someone applies for a job with 2-Switch Ltd.

We are committed to keeping your information up to date as far as is reasonably possible however, if you believe that we have made an error, then please contact us as we have outlined below and we will use reasonable endeavours to correct.

Keeping Your Information Safe and Secure

We are committed to ensuring that your personal information is secure and protecting it from being inappropriately or accidentally accessed, used, shared or destroyed, and against it being lost.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and in paper form. We only provide access to your data to staff who require access.

Sharing Your Data with Third Parties

Access to your personal information is only allowed when required by the law or is required as part our fulfilling our service obligations. We do not, and will never, sell your personal information with other third parties.

As a broker of electricity, gas, water, merchant services and telecoms supply for businesses when you become a client, we will need to share your details with your new energy/ utility provider as part of our contracted arrangements.

For our general day to day data processing activities, we use the following to help us administer and monitor the services we provide:

- For database management of our clients, staff and office admin.
- For our telephone system and call recordings.
- For payroll and financial accounting and outstanding payments.
- To share newsletters, promotional detail, industry news or other information that may be of interest to you.
- To help us improve our services and database.
- For credit checking and verification of client applications.
- For monitoring customer meters for potential unauthorised activity.
- For the administration of our website, cookies and customer interactions with 2-Switch Ltd.
- For any legal guidance in the provision of our services.

For full details of all third-party suppliers, please contact us at sales@2-switch.com

International Data Transfers

We are a UK based Company and following Brexit we will continue to store and process personal information mainly in the UK or EEA.

Please note though that in some instances your data may be exported to as well as stored and processed in countries outside of the country in which you reside, including, without limitation the United States.

For data subjects residing in the UK or EEA, this means that your personal information may be exported, stored, and processed outside of the UK or EEA. Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of data privacy and protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK and European Commission.
- Where we use service providers who are not in territories approved by the UK or EU commission, we will look to implement additional safeguards such as a detailed review of security measures and the use Standard Contractual Clauses (SCCs) approved by the UK and or European Commission.

To receive information on the recipients of your data or if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA, please contact us at: sales@2-switch.com

How long do we keep Personal Information?

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general terms we will retain the data

- Of our clients for the duration of the services provided under contract.
- For ex clients or businesses that have not or yet to subscribe to our services we will retain your data in line with any known utility contract expiry dates or up to a maximum of 60 months (representing the maximum utility supply contract).
- For anyone who applies or enquires about joining 2-Switch Ltd but does not work for us, we will hold your details for a maximum of 6 months.
- For our staff, the records are held in line with HMRC requirements for up to 6 years after you leave us.

For full details please contact sales@2-switch.com for a copy of our Retention Policy.

Marketing & Market Research

2-Switch Ltd undertake a range of marketing activity using the data held within our database. This includes:

- Maintaining regular contact with our clients and prospect clients to keep them advised of industry news.
- To share our newsletter or other promotional information.
- We make use of social media channels such as Facebook, LinkedIn and Twitter for business promotion.

- We use cookies to gather statistics around email opening and clicks using industry standard technology to help us monitor and improve the information we send out.

We may also make unsolicited approaches and calling to new potential contacts or business clients, using prospect information held within our records or using information drawn from publicly available sources. These approaches are made in a fully compliant manner as governed by PECR (the Privacy of Electronic Communications Regulation), with the contacts being given the option to opt out from such contact.

We may have acquired your data from a data broker; where possible we will notify you that we are holding your data and how this will be used as expected of us as data controller.

Any changes to our marketing activities will be updated in this Policy and we will ensure that the activity we undertake will be compliant with UK and European data protection regulations.

How We Use Cookies

2-Switch Ltd, like most organisations has a website and like most websites we also use ‘Cookies’.

We may gather information about your general internet use by using a cookie file. Cookies are downloaded to your computer automatically and stored on the hard drive of your computer. They help us to improve our website and the service that we provide to you by collecting statistical data about your browsing actions and patterns; they do not identify you as an individual.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies; you may be unable to access particular parts of our website.

For more details on our use of cookies please refer to our Cookie Policy.

Links to other Websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

Controlling Your Personal Information (Your Rights)

It is important that the personal information we hold about you is accurate and current. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect.

Under certain circumstances, you have rights under UK Data Protection Act 2018 (DPA) and the EU General Data Protection Regulation 2016/679 (GDPR) in relation to your personal information. You may have the right to:

- Access information held about you. Your right of access can be exercised in accordance with data protection law;
- Object to us processing or ask us to restrict our processing of your personal information for any of the purposes listed in this policy, at any time.
- Ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge.
- Ask us to erase or delete your personal information (in certain circumstances). We will do our best to respond to such requests, but these are subject to certain limitations such as legal requirements.
- Request a transfer of your personal information (in certain circumstances).

If you wish to exercise any of the above rights or to review, verify, correct or question anything detailed in this policy or are unhappy with any aspect of how we use your data please contact us at

sales@2-switch.com or by writing to

Vernon Simons
Data Protection Officer
2-Switch Ltd
Cold Hall Farm,
Shallford Road,
CM7 5AS

Alternatively, you can telephone us 0203 924 0505

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

We are a registered Data controller with the Information Commissioner's Office our ICO registration number is: ZB109189

Changes to Our Privacy Policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This privacy policy was last updated in July 2024.