

Bulb Privacy Policy

Introduction

We know that providing personal information is an act of trust and we take that seriously.

This Privacy Policy should help you understand how we collect, protect, and use your data. The data we collect will be transferred from the United States to the European Economic Area (the “EEA”) for processing, and such processing activities are governed by the data protection rules of the European Union (“EU”), including the EU’s General Data Protection Regulation (the “GDPR”). If you have any questions or would like to make any requests about your personal information such as opting out of marketing, please email privacy@bulb.com.

We go into more detail later on this page, but here's the short and sweet version:

In a nutshell

Most of the data we collect and hold about you is for the purpose of providing your energy. We also use data to improve Bulb's products and services, and to help us advertise Bulb.

To supply you with energy

We gather information about you and your home so we can accurately supply your energy. For example, we need to know your address to supply the right property, and we need to know how much energy you use so we can send you accurate bills.

Where necessary, we share this information with other organizations in the energy industry, like your old supplier, ERCOT and the organizations that maintain the national energy databases.

To make Bulb better

We collect data on how you use our website, App and other features. We track things like where you click on our site and what features you use. This lets us learn what's working well and what features we need to improve.

We sometimes share this data in an aggregated form with agencies or partners that are helping us. For example, we might tell a telecommunications partner how many phone calls we get a week.

To advertise Bulb

We use your data to help grow Bulb and spread renewable energy. If you're a member of Bulb, we share data with social media, search engine, and other advertising platforms so that we stop asking you to join Bulb, and instead show you content more relevant to you.

We also share aggregated data with third parties and service providers that help us with advertising. For example, we might share how many of our members live in Dallas.

To communicate with you

In addition to sending you key information about your account by email, from time to time we'll also send you information about things we think will interest you. This includes letting you know how much carbon you're saving each year by being with Bulb, updates on our referral program, and reminding you about how you can manage your energy online.

Where necessary, we share your data with organizations that send communications on our behalf. For example, we ask Trustpilot to send invitations to our members to review Bulb.

Information that we collect

Information you provide us at sign-up

- Contact information: such as your name, address, email address, date of birth and telephone number.
- Vulnerability information: such as disabilities, age, or health conditions for you or a member of your household. This helps us provide suitable additional services.

- Identifiable information: Such as social security number or driver's license number. We may use this information to run a soft credit check. This information is protected by encryption. We restrict access to your social security number to our employees or service providers who have a need to use your social security number to run the credit checks. We delete your social security number from our systems (and direct our service providers to delete your social security number) after the credit check is run.
- Financial information: such as your payment details and financial circumstances. We need your bank details if you want to pay by direct debit. If you have difficulty paying our bills, providing details of your circumstances helps us work with you to resolve this.
- If you are eligible for the Net Metering scheme: additional information to confirm your identity (such as a copy of your passport or driving license, or proof of company registration) and information about your Net Metering installation (such as a certification document and your installation meter details).

Information while we provide you services

- Information about your energy supply: such as your meter reference numbers and meter type. This ensures we link you with the right meter.
- Energy you use: such as details of your energy use and your supply start and end dates. We need details of your energy usage so we can send you accurate bills.
- Energy you generate: details of energy you generate under the Net Metering scheme. We need this information so we can accurately calculate the payments due to you.
- Customer service data: when you get in touch by phone, email, chat or community posts we monitor, record and review those communications so we can provide the best possible service to you and all our members and so we can show evidence of transactions or events.
- Data about your interactions with us: such as information about how you communicate with us (by phone, emails, or chat) and how you use our website and App or interact with our ads and content on other websites. More detail is set out in our Cookie Policy.

Information from third parties and information we automatically collect

- Technical data: such as IP addresses (including the general information in such address, such as city, county and postcode), login details and other

information about your mobile devices, browser types and browser language. More detail is set out in our Cookie Policy.

Information provided by others

Affiliates and partners: when you sign-up with Bulb through an affiliate or partner (such as a price comparison website), we are sent your personal information from that partner so we can enter into a contract with you. The information we collect from such affiliates and partners include your address and contact information.

Energy industry partners: metering information, debt information, and information related to your Chronic Condition or Critical Care status can come from other organizations involved in supplying your energy, such as your old supplier, meter operators, or your Transmission and Distribution Service Provider (“TDSP”).

Landlords and estate agents: data such as your name and contact details may be provided to us by people moving in or out of a property you're occupying, or a landlord or estate agent. We may use this information to contact you in relation to the continuation of the energy supply to your property.

Councils, postal services, and data brokers: information such as contact details, homemoving status and other details about your circumstances can be provided by councils, postal services and data brokers. We will always check that these organizations have your consent or are otherwise legally permitted to share this information.

Referrers: data such as your name and contact details may be provided to us by people referring you to Bulb as part of our Referral Program. We may use this information to contact you in relation to becoming a Bulb member.

How we use this information

It's important that you understand what we'll do with the data that we hold about you, as well as the lawful reasons we are allowed to do this.

We may sometimes combine information that we collect from you with information we obtain about you from third parties and affiliates and

information derived from any other subscription, product, or service we may provide.

We use the information we hold about you for the following purposes:

Performing our contract with you

We need to process information in order to supply your energy and the services you've asked for under our contract. For example, we may use your information (such as your contact information) to organize your switch to Bulb, to take monthly payments and organize meter repair jobs.

Fulfilling our legal and regulatory obligations

Many of the ways we manage your energy are based on requirements set out in our License and by the Public Utility Commission of Texas directions and Codes, such as how we set out your annual statement and how we deal with disputes. We may also need to disclose your personal information to comply with applicable laws, regulations, and court orders, or disclose information to entities including, but not limited to, law enforcement agencies, the Public Utility Counsel, consumer reporting agencies, energy assistance agencies, or the transmission and distribution utility. Additionally, we may disclose your personal information to protect or enforce our rights, or to protect the rights or safety of others.

Taking your smart meter readings with your consent

If you have a smart meter, your TDSP will provide us a monthly report of your meter information. Additionally, we may access your 15-minute smart meter interval data through SmartMeterTexas.com. Please review the privacy notices of these third parties to learn more about their data privacy practices.

Analyzing your smart meter readings to offer you new products and services with your consent

If you have a smart meter, we could use your smart meter readings to understand how you use your energy. For example, we could learn how to buy energy for lower prices and be able to build and offer you new products and services. We will only use your smart meter readings to do this if you have

given us your consent. You can email us at privacy@bulb.com at any time to withdraw this consent.

For our legitimate business interests

This means that using your information is necessary for us to build our business and provide our services to you. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include:

- Maintaining and improving our services: for example, we may use your information that we obtain through your emails and calls to train our team. We may also use your information to ensure that our services are working as intended – for example, understanding which parts of the website are easiest to use. We may also contact you for suggestions on how we can improve the way we provide our services to you.
- Providing personalized services.
- Providing personalized advertising: we may let advertising platforms like Facebook and Google know that you are a member of Bulb by sharing your contact details with them. This means we can stop asking you to join Bulb once you're with us, and instead share information with you that we think you might be interested in.
- Communicating with you about our services: we may contact you about Bulb news, product updates and new products that we think you might be interested in. We may also contact you to provide you with offers, competitions, marketing materials and other promotional materials, both online and through other marketing channels, such as third party social networks, like Facebook. We do not contact our members with marketing messages through SMS or direct messaging via social media.
- Measuring our performance and developing new services: for example, we use data for measurement to understand how our services are used. We also use aggregated data to understand our members and their energy usage better. This helps us develop offerings such as our Annual Impact Report.
- Helping to prevent and detect fraud or debt: we also need to be able to detect and prevent fraud and recover unpaid bills.

If you have questions about the lawful basis on which we collect and use your information, you can email our Data Protection Officer at privacy@bulb.com.

Sharing your information

When we share your information

We sometimes need to allow our service providers, third parties, or affiliates to process personal information we hold about you on our behalf for the reasons set out in this Policy or as otherwise required by law.

We make sure that these third parties won't use your personal data for their own purposes and we only permit them to use it in accordance with our instructions and the law. This includes the following types of organizations:

- Trusted businesses or persons: who process your information for us for the purposes set out above, based on our instructions and as set out in our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with member support or payment processing.
- Energy industry partners: including other suppliers, network operators and energy market administrators.
- Payment providers: we work with payment providers to process your payments. We use **Stripe** to process your direct debit, debit card, and credit card payments and **Transferwise** to process other payments to you (such as referrals). You can find more information on how these providers process your personal data and your data protection rights by looking at their privacy policies at the links above.
- Marketing agencies, search engines and social media networks: to advertise Bulb and to gather feedback on Bulb such as through customer surveys. To opt-out of marketing communications you can email us at privacy@bulb.com.
- People you have authorized us to share data with: such as family members, energy brokers, solicitors and debt management companies, so we can fulfil your requirements.
- Market regulators: such as the Public Utility Commission of Texas and consumer protection organizations where we are obliged to do so under regulations.
- Price comparison sites and other affiliates: if you are have signed-up to Bulb using a price comparison site or via an affiliate link. We then provide the affiliate with your personal data such as your email address, only to the extent that we can fulfil a contract you have requested.
- We may share information collected from your smart meter with our affiliates, service providers, or other third parties for the purpose of providing you electric utility service or other services you may request.
- Credit reference agencies (such as Experian): We may tell credit reference agencies how you're managing your account and whether you owe us money.

These agencies can help us trace you if you have moved and we owe you money or you owe us money. More information is set out in [Experian's Credit Reference Agency Information Notice](#).

- People you are referring to Bulb: if you refer a new member to us, we may share your name and aggregated data about your energy use with the referred person.
- Samsung: if you are a Bulb member and you have chosen to sign up to Samsung's SmartThings App in order to view your Bulb energy usage and pricing data. We then provide Samsung with that data. Samsung will use personal data in accordance with its own privacy policy which will be presented to you in the SmartThings App.
- Third parties to whom we may choose to sell, transfer or merge part or all of our business or our assets. If a change in our business occurs, then the new owners may use your information in accordance with this privacy policy.

You can find more information on how these providers process your personal information by looking at their respective privacy policies.

When you share your own information

Sometimes you may share your information publicly, such as by posting on our [Community](#) page or on social media sites. Remember, when you share information publicly it may become accessible through search engines.

Sending your data outside the European Economic Area

Sometimes our agents and service providers are based outside the European Economic Area, so when working with them, we may pass your information outside of the European Economic Area to countries that do not have the same data protection standards as the UK.

If we do this, we will ensure that any information will be protected in line with this Privacy Policy. Some of the safeguards we rely on to share your information outside the European Economic Area include ensuring that the supplier has, if in the USA, certified to the Privacy Shield.

You're in control

Your rights

If we collect or handle your personal data, under certain circumstances you have rights as an individual which you can exercise in relation to the information we hold about you:

- To correct or update your personal information, you can log into your **Bulb Account** or you can email us at **privacy@bulb.com**.
- To delete your personal information, you can email us at **privacy@bulb.com**. We may delete any information that we no longer need to hold, but we won't always be required to do this. For example, we may need to hold your information to continue to provide your energy under our contract. If this is the case, we'll explain why.
- To ask us to restrict processing of your personal information or transfer your personal information to a different organization, you can email us at **privacy@bulb.com**.
- To confirm if we are using your personal information or get access to all your personal information that we hold, in an easy to understand, portable and secure format, you can email us at **privacy@bulb.com** with the subject line "Subject Access Request".
- To object to the processing of your personal information, you can email us at **privacy@bulb.com**.
- To withdraw consent to process your data, you can email us at **privacy@bulb.com** at any time.
- To opt-out of marketing communications you can email us at **privacy@bulb.com**.

Once we receive a request from you, we will try to respond within at most 1 month, but usually a lot quicker. Occasionally it could take us longer than a month if your request is particularly complex or if you have made a number of requests. Before actioning these requests, we will need to positively identify you. We aim to send responses to all emails within an hour.

You will not be required to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

If you're unhappy with how we've handled or processed your personal information - or you want further information about your rights - you have the right to contact the **Information Commissioner's Office**, the supervisory body that regulates the handling of personal information in the UK.

Keeping your information secure

Whilst we cannot ensure or guarantee that unauthorized access to or unauthorized alteration, disclosure or loss of information will never occur, we work hard to help prevent it. In particular:

- We use encryption to help keep your data private while in transit.
- Your account information is protected for your privacy and security with a password you have chosen or you can log-in to your account directly with your email address. Bulb and our agents will never ask for your password.
- To help keep your account and your personal information secure you should not disclose your password details to anyone. You should also make sure your Bulb account password is different from your email address password. We recommend you change your passwords from time to time.
- We review our practices for collecting, processing and storing personal information, including appropriate physical security measures, to help guard against unauthorized access to systems and backups to help prevent the loss of information. We will continue to enhance our security procedures as new technology becomes available.
- We restrict access to personal information wherever possible to people who need to know that information to process it and who are subject to contractual confidentiality requirements.

Retaining and holding your information

We keep the personal information we collect for no longer than is necessary for the purposes for which we collected it or to otherwise protect our legal interests or meet our legal obligations.

The length of time depends on the purposes for which we use it, or otherwise to meet our legal obligations.

To the extent reasonably practical, we will delete any information as soon as we no longer have a valid reason to hold it. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Third-Party Links

This website may include links to third-party websites, plugins or applications. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Contact us

You can get in touch about anything in this Policy by emailing us and our Data Protection Officer at privacy@bulb.com or by [contacting us](#).

About this Policy

When this Policy applies:

For the purposes of this Policy, "we", "us", "our" and "Bulb" means Bulb US LLC. Unless otherwise stated, Bulb is the Data Controller for your personal data.

This Policy applies to how we use your information in relation to our products and services generally.

This Policy doesn't apply to other companies' sites that you get to through our website or social media pages. So make sure you've read their policy before putting your personal information on their site.

Changes to this Policy:

We may change this Policy at any time. If we make any changes, we'll post them on this page. If they're substantive changes, we'll also have a more prominent notice letting you know. You can also email or write to us for a physical copy.

Your continued use of our services will mean that you accept and agree to any changes to the Privacy Policy.

Last updated: The Policy was last updated on November 14, 2019.