



GenGame Privacy Policy

Last Updated: 26th April 2021

1. Background:

GenGame Ltd are a UK based business who develop mobile apps and other digital and web-based products for use by both companies and individuals. These products are designed to help those companies and individuals to manage their energy, to save them money and reduce their carbon footprint.

To do this, we sometimes need to collect some personal data from you when you use our products. We will only capture the minimum amount of information required to offer our services and to help you, and we will treat your personal data as if it were our own, keeping it safely and securely, never keeping it longer than is necessary and only sharing it with your knowledge, permission or if we are required to do so by law.

This policy outlines the details of how we use your information and also some small print which you need to know, and we are required to provide by law.

Our company, GENGAME LTD is registered in England under company number 08680450, and is known as GenGame (or also just 'we' or 'us'). We are registered with the UK Information Commissioners Office (ICO) under registration number ZA256900.

This privacy policy applies to this website and the services offered by GenGame (be that via the GenGame platform or one of the apps created by us including the 'GenGame Energy Saver' app and the 'GetSmart' app, which you can download in the iTunes App Store and Google Play.)

We also offer our services via other companies under their branding. This policy also explains how our partners may use your information. For ease of reference, we shall refer to any service we offer directly or via a partner as the "Service".

2. Our service and reason for processing your data

We provide our software to people who are customers of the companies that we work with. These people (collectively known as "Users") can access our service through apps, a platform and website (the "Service" we provide). This Service offered by GenGame to Users is intended for use as is.

The personal information that we collect enables GenGame to:

- Deliver and improve the Service;
- Support you to use the Service;
- Work with your energy company to deliver the Service; and
- Provide enhanced services and rewards to you (in partnership with third-parties).

Before using the Service, GenGame will ask your consent to obtain your data. We only collect the personal data required to enable us to deliver our Service to you. A full list of the personal data we collect is in Section 3. There may be certain aspects of the GenGame service, which we deliver in partnership with third-parties. We will only share personal data with third parties with your consent. We will always explain to you why we are sharing your personal data, our relationship with the third-party and how your data will be used. Please see Section 6 for a full list of the data we share.

3. Personal data we collect from you

To deliver our service, we may collect personal data, including but not limited to:

Identity and Contact Data about you and how to contact you.

Profile and Consent Data which comprises preferences (for marketing and other notifications), feedback and survey responses you have provided and partly anonymised analytical information about how you use our app.

Energy Hardware Data about and hardware you may own, such as your electric vehicle and its charger, your home electric storage battery, solar system and heating system so we can help you use these more efficiently or effectively and control them if you choose to let us.

Energy Supply Data such as your energy supplier, tariff and meter reference number so we can apply the right tariff and grid information to your supply, and so (with your consent) we can identify smart charging to third-parties.

Smart Meter Data including your electricity and gas consumption data from your smart meter, so we can help you better understand your energy consumption and suggest opportunities for you to save energy or money on your energy bill.

Third-Party Account Data which allows us to link your GenGame account to your Energy Hardware or energy supplier accounts.

Technical Data about the device you use to connect to our platform, your time zone and locale to enable us to tailor the user experience for your device and to ensure we support the devices you want to use to access the app and platform.

Transaction and Financial Data about your energy usage and for any services you purchase through the platform

Tracking Data which includes information we or others collect about you from cookies and similar tracking technologies such as web beacons, pixels and mobile identifiers.

For more detail on the specific data within any of these categories, please see Appendix A

The information that we request will be used and retained by us and only shared with third parties where it is necessary to provide the service to you, and then only as described in this privacy policy. We do not use your data for any automated decision-making or profiling.

We may use, collect, and share aggregated data with third-parties. Aggregated Data may be derived from your data, but, as this data does not directly or indirectly reveal your identity, it is not considered personal data in law. For example, we may aggregate your and other users' Energy Consumption Data to help utilities plan how much energy they need to buy or produce for their customers.

4. Usage and log data

Whenever you use our service, we may collect some usage and log data. For example, in the case of an error or bug in the app, we log information about the error to help us fix the error and stop it happening again in the future.

This Log Data may include the information listed under 'Technical Data' in Section 3 above and Appendix A, as well as the time and date of your use of the Service and configuration specific to your user account or profile.

5. Cookies

This Website uses Cookies. These are commonly used files with small amounts of data which are a unique anonymous identifier. Cookies are downloaded from the website that you visit and stored on your device's internal memory.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies, we need your permission.

We currently only use cookies that help make our website work. Their names and what they do is shown in Appendix C, below.

6. Providing your personal data to others

There are several reasons why we may share your data with other parties to enable us to deliver our Service to you.

6.1 Sharing your data to deliver and improve our Service

To provide our Service to you, GenGame uses selected third parties to provide you with the service, and shall share some information with them, under strict confidentiality obligations, to provide you with the services.

Our service providers include:

- Amazon Web Services, to enable us to run our cloud-based platform ([Privacy Policy](#)).
- Mailchimp to deliver e-mails to you on our behalf ([Privacy Policy](#)).
- ESG (<https://esglobal.com/>) provide us with a service to access your smart meter data with your explicit consent obtained by Us or by your energy supplier
- Energy Analytics provider Onzo (<https://www.onzo.com/>) who for some of Services provide us with a platform that analyses your energy data to infer insights such as how you are using energy so that we can help provide these insights to you. We pseudonymize your data before passing it to them so they do not have information to be able to tie these insights back to you.
- Energy Analytics Lucid (<https://lucidenergy.tech/>) who provide us with a service that analyses your energy data to infer insights such as how you are using energy so that we can help provide these insights to you. We pseudonymize your data before passing it to them so they do not have information to be able to tie these insights back to you.

We may additionally ask for your permission to share your personal data with your electric vehicle manufacturer, your charger manufacturer, your home solar storage battery manufacturer or heating system manufacturer to enable us to deliver our Service to you, and obtain Data about these systems, Account Data and Transaction Data from them.

For more information on our service providers, links to their policies and their location, please see Appendix B

6.2 Sharing your data to support you as a customer

If you require support from GenGame, we may share your personal data with suppliers and subcontractors to help resolve this issue. The data will include the nature of the query and any data supporting that, which may include Identity and Contact Data, Technical Data, Energy Hardware Data as defined in Section 3.

We will only share the information where it is necessary to allow us to be able to provide those products and services to you.

6.3 Sharing your personal data with your energy company

We may work with your energy company to deliver our Service to you and may share your personal data with them, subject to the contractual relationship you have entered with them.

6.4 Sharing your data for legal reasons

Usually, we will only share personal information with your consent; however, we will share personal data where we have a legal obligation to do so; for example when directed by a court, or if requested with an appropriate warrant by law enforcement or tax agencies.

We may also share information without your permission where a person's life is in danger and to instigate or defend a legal claim, for example, with a solicitor, or a court.

6.5 Sharing your data for other reasons

We may also share information on your energy consumption, electric vehicle charging sessions, and app usage with all personal data removed, with our research partners including Newcastle University, Teesside University and Loughborough University as part of our research projects. These are to allow them and us to understand the impact of our solution on energy use, and to allow us to improve our products and services.

On our site and in our apps we may advise you of third-party goods or services which may interest you. If you give your permission, we may share your enquiry data with one or more selected third-party suppliers of goods and services identified, so that they can deal directly with you.

We may employ third-party companies and individuals to help us deliver and improve our Service to you.

We will take all reasonable precautions to ensure that any third party who processes your personal information on our behalf does so lawfully, commits to keeping your personal data both safe and secure, and will not share it with any other parties without our explicit permission. All third-parties will undergo a due-diligence process and a written agreement with specific terms around data security, and privacy is in place.

7. Third-party websites and links to other sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. We do not operate these external sites and we therefore strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

8. Retaining and deleting personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

We will usually retain all personal information for up to seven years after you last use our Service unless you are taking part in one of our trials or research projects where you and we have agreed to delete it after the trial. Anonymized statistical data regarding the use of our apps, services and their impact on energy consumption will be kept indefinitely but will have no personal data associated with this information.

In some circumstances, you can ask us to delete your data before the above time limits. Please see the "Right to Erasure" in Section 11 below for further information.

9. Security of Personal Data

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

The primary data store for all data in our platform is within the EU. For a detailed list of our service providers, their privacy policies and where they are based, please see Appendix B.

We encrypt all data within our systems at rest. For services provided by third parties (such as those listed in Appendix B), we ensure that at a minimum sensitive data (such as passwords) are encrypted at rest, and access to all data are encrypted in transit.

Only secure access (such as HTTPS or WSS) is possible to the GenGame platform. We send all information to our apps securely, protected by encryption, to your device. Additionally, where data are accessed directly on our platform by third-parties, their access to your data is secure and encrypted too.

We will take every precaution to protect your personal data once in our care; however, the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent by you or us over the internet. We value your trust in providing your personal data to us, and we will use all reasonable and commercially acceptable means to protect it. Still, unfortunately, no method of transmission over the internet, or method of electronic storage is 100% secure and reliable.

To help protect your account and personal information, you should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our apps and services confidential, and we will not ask you for your password (except when you log in to our platform). The ICO has some [advice for protecting your information online](#).

10. Lawful bases of processing your information

When you download our app, sign up to either our Service, or a Service that we deliver on behalf of one of our partners, we will ask for your explicit consent to capture, process and share your information. We may also ask for your permission to share your login details with third-party energy companies and energy information providers to verify which energy rate plan or tariff you are using.

We will use the lawful basis of 'legitimate interest' to assist you with any technical queries you may make via our in-app helpdesk function, or if you make any general enquiries to us. We will also rely upon legitimate interest to share personal data with our data processors supporting us in providing the service to you and for sharing anonymised statistical data with authorised third-parties.

You may hear about GenGame or one of our apps from your energy supplier, and they may provide your contact details to us after asking for your consent. We will rely on this consent provided to them to tell you about our Services.

It may be necessary to share charging data, invoice details and other energy data with third parties, and we will process this data under our contractual obligations to either yourself or your energy company. We may share your data under our legal obligations or where a person's life is in danger, as outlined in Section 6.4

11. Your Rights

You have the following rights concerning your personal data:

The right to be informed – an obligation to tell you what we do with your personal data (which we do in our software and via this privacy policy) and we shall inform you if there is a serious breach of your personal data which would result in a high risk to your fundamental rights and freedoms.

The right of rectification – an obligation in certain circumstances to correct your personal data if it's inaccurate or incomplete.

The right to erasure – an obligation in certain circumstances to delete or remove your personal data where there is no compelling reason for its continued processing (some jurisdictions also call this right 'the right to be forgotten').

The right to restrict processing – an obligation in certain circumstances to stop actively processing your personal data.

The right to data portability – an obligation in certain circumstances to allow you to transfer your personal data from us to a third party.

The right to object – an obligation in certain circumstances to allow you to object to us processing your personal data where we do not have an overriding reason. A right to object to use of your personal information for direct marketing purposes.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You have the right to be made aware of any automated decision-making, made without any human involvement, or profiling of your personal information by GenGame Ltd. Currently, we don't use any automated decision-making.

The right of access – a right to be told what personal data we hold about you and obtain a copy of that information.

You will not have to pay a fee to access your personal data (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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights), to ensure that we do not disclose personal data to any person who has no right to it. We may also contact you to ask you for further information concerning your request to speed up our response.

We try to complete all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you informed of how we will deal with your requests.

You have the right to complain to the supervisory authority responsible for data protection in whichever state or country you reside. In the UK, this body is the [ICO](#).

12. Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to perform the necessary actions.

13. Changes to This Privacy Policy

This is version 1.0.1 of the GenGame Ltd privacy policy, effective from 26th April 2021

We may update our Privacy Policy from time to time. We advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

14. Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us by email: admin@gengame.co.uk

Appendix A

1. Identity and Contact Data

- First name and last name
- Your username or similar identifier in the GenGame platform
- An encrypted version of your password
- Your social media username (if you interact with us via social media)
- Your home address, e-mail address(es) and telephone number(s)

2. Profile and Consent Data

- Your preferences on how and when we can contact you
- Preferences on your subscriptions to digital marketing and non-marketing communications
- A record of where you have provided or withdrawn consent to share your data with third-parties
- Feedback to surveys and questionnaires delivered via e-mail and in-app
- Feedback provided during design research programmes (which may be anonymised or semi-anonymised)
- Partly anonymised data from app analytics platforms such as Google Analytics which show an aggregated view of how you use our apps and platform

3. Energy Hardware Data

- The make, model, trim and registration or license of your vehicle
- The battery size and charging capabilities of your vehicle
- The make, model and configuration of your vehicle charger
- The state of charge of your vehicle
- If your vehicle and charger are connected
- If your vehicle is charging
- The location of your vehicle and charger

4. Energy Supply Data

- Your energy supplier name and price plan or tariff name
- Billing information about your supply such as your energy supplier account number
- Meter Point Administration Number (MPAN) or Reference Number (MPRN)

5. Smart Meter Data

- Your home electricity consumption and tariff data
- Your home gas consumption and tariff data

6. Third-Party Account Data

- Encrypted username and password or access token for a third-party service
- Account identifiers or references to identify your account in a third-party's system
- These data will only be requested and stored after you have provided consent

7. Technical Data

- Connection information such as IP address
- Client information such as the type and version of the device, operating system, browser and any plugins you may be using
- Your time zone and locale

8. Transaction and Financial Data

- Details of the products and services you have purchased from us
- Details of how much energy used to charge your electric vehicle, and when this charging happened
- Payment information made to us from you, including references to your account stored in our payment providers' system

9. Tracking Data

- Includes information we or others collect about you from cookies and similar tracking technologies

Appendix B

1. Service providers to GenGame Ltd

Name	Location
Amazon Web Services	EU (Ireland)
ESG	UK
Google	EU
Mailchimp	USA
ONZO	UK
Intelligent Data Technologies Ltd	UK
Redash.io	USA

2. Energy suppliers & utility partners

Name	Location
So Energy	UK
Green Energy UK	UK
Ecotricity	UK
Shell Energy Retail	UK
Northern Powergrid	UK

Appendix C

Cookie Name	Purpose	Duration	Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring /debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	Session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional