



Privacy Statement

Version: 1.0 (May 2018)
BritNed Development Limited



1. Introduction

Our commitment

- 1.1 BritNed Development Limited (“BritNed”) is committed to protecting and respecting your privacy.
- 1.2 We will always collect and handle your personal data in an appropriate and secure manner and in accordance with applicable laws, rules and regulations, including the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”).

Purpose and scope

- 1.3 This Privacy Statement explains what personal data we will collect from you, how we use it and how we keep it secure. This includes information provided to us by our business clients through their interactions with our services and our Kingdom® trading application, as well as information provided by individuals through other communication channels such as our website.
- 1.4 For the purposes of this Privacy Statement, ‘personal data’ is defined as any information relating to an identified or identifiable natural person. Our definition is consistent with that outlined within the GDPR. We collect and process a limited range of personal data in the course of our business activities but always take our responsibilities seriously as a controller of this data.

2. About us

Company profile

- 2.1 BritNed owns and operates the first subsea electricity interconnector between Great Britain and the Netherlands. Our business clients have the opportunity to purchase capacity of the interconnector, enabling the flow of electricity in either direction between Great Britain and the Netherlands. We give our clients open access to this capacity through a portfolio of auction products and our Kingdom® trading application.
- 2.2 We are registered in England and Wales under company number 04251409, with our registered office at 1-3 The Strand, London WC2N 5EH.

Contact information

- 2.3 Any questions regarding this Privacy Statement, or our approach to privacy or concerns with how we may have processed your personal data can be sent via email to us at: britned.info@britned.com or in writing to:

Data Protection
BritNed Development Limited
P.O. Box 718
NL-6800 AS Arnhem
The Netherlands

3. What personal data we may collect

- 3.1 We may collect and process the personal data of a range of individuals, including:
- a. Business clients (including their representatives who use our Kingdom® trading application);
 - b. Visitors to our website;
 - c. Individuals who may communicate with us as part of our business activities (e.g. potential business clients, service providers, etc.);
 - d. Others who may directly contact us.

Data collected on our Kingdom® trading application

- 3.2 For our business clients who have access to our Kingdom® trading application, the personal data we collect may include your name, email address and telephone number. This information will have been obtained when processing your original request for access to this application. When accessing our Kingdom® trading application we will also collect information about your computer, including where available your IP address. We use IP information as part of detecting and preventing unauthorised access attempts to our applications.

Data collected by other means

- 3.3 We collect personal data from visitors to our website in limited circumstances, for example where you chose to contact us through the use of our online 'Contact' form. The information we collect may include name, postal and email address, telephone number(s) and organisation.
- 3.4 We also collect information should you email us or contact us in any other way (for example by post, telephone, fax) with your details and we may keep a record of that contact.

4. How we use personal data

- 4.1 As a general principle, personal data which is provided to us by any individual, will only be used appropriately and to provide any necessary assistance (e.g. responding to a query or comment).
- 4.2 We will only use personal data obtained from our business clients to provide and improve our services to them, including contact regarding the management of their account, general customer service and to detect, prevent and investigate fraudulent activities by third parties.
- 4.3 We will retain any personal data we have obtained for an appropriate period, sufficient for the activity to which it relates and to meet any retention period as required by any legal or contractual obligation.

5. Access to personal data

- 5.1 Personal data held by us may be accessed by or disclosed to:
- a. BritNed team members;
 - b. Third party organisations that provide services on behalf of BritNed (e.g. IT providers);
 - c. Auditors and other professional advisors;
 - d. Law enforcement or other applicable agencies as required by, and in accordance with, applicable laws or regulations.

BritNed team members

- 5.2 We will seek to minimise access to your personal data by both our team members and third party service provider representatives by applying a 'need to know' principle.

Service providers and third parties

- 5.3 We may pass your information to our third party service providers for the purposes of completing tasks and providing services to you on our behalf. In these circumstances, we always ensure that the information is safe and secure and that there are appropriate contractual provisions with these service providers to ensure that they comply with applicable data protection laws and this Privacy Statement.
- 5.4 Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable laws and regulations, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable laws and regulations.
- 5.5 We will never sell or share your information with third parties for marketing purposes.

6. How we store and maintain the security of personal data

- 6.1 We will take all necessary reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Statement. All our team members are personally responsible for maintaining the confidentiality of personal information and we provide training to them to ensure they understand their obligations and the actions necessary to keep information secure.
- 6.2 Where we store your data electronically, this will be on secure servers which meet recognised security standards and will endeavour to prevent unauthorised access to this information.
- 6.3 The information which you provide to us may be transferred to countries outside the European Union ("EU"). For example, this may happen if any of our servers are located in a country outside of the EU. These countries may not have similar data protection laws to the EU. By providing us with your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Statement.

- 6.4 Please note that the transmission of information to us through the use of the Internet or via non-electronic means can never be guaranteed as completely secure. As a result, we cannot guarantee the security of this information when in transition and this transmission will be at your own risk.

7. Website and use of “cookies”

What are “cookies”?

- 7.1 Our website (www.britned.com) and web-based Kingdom® trading application involve the use of a mechanism called “cookies”. A cookie is a small amount of data, which often includes an anonymous unique identifier, that is sent to your browser from a website and stored on your computer's hard drive, if your browser settings permit it.

How we use “cookies”

- 7.2 Our website only uses analytical cookies to help us to understand how it is used, such as how many times our website is visited by a single user and where the user has navigated from (e.g. a search engine). These cookies may include those provided by Google Analytics which we may use to help analyse the use of our website. By understanding how our website is used, this may help us to improve this communication channel for all users.
- 7.3 Our Kingdom® trading application uses standard session cookies which are necessary for users to access and interact with the application. These cookies are temporary and will be deleted when your browser is closed after using the application.
- 7.4 The data collected by the cookies we use is in anonymous form, they do not collect and track personally identifiable information about users of our website or Kingdom® trading application, or are used to target advertising or to share information with social networking sites or other services.

Removing “cookies”

- 7.5 If you do not agree to our use of cookies, you can adjust your browser settings to reject all cookies (each browser is different, so check the “Help” menu of your browser to learn how to do this). Please be aware that our Kingdom® trading application cannot be used without cookies being accepted from it. Alternatively you can choose to delete any cookies after you have finished using our services.

Links to other websites

- 7.6 This Privacy Statement does not cover the links within our website to other third party websites. We encourage you to read the privacy statements on the other websites you visit.

8. Individual rights and how to exercise them

- 8.1 You have certain legal rights in relation to your personal data that we hold about you and we have a duty to help you exercise these rights.
- 8.2 You can write to us at any time using our contact information in Section 2 (About Us) of this Privacy Statement to request a copy of your information we hold or to have any inaccuracies corrected. Where appropriate, you may also ask to have your personal data erased or object to any processing of your information in certain circumstances.

There are no fees or charges for your first request. However, additional requests for the same data may be subject to an administrative fee of £10 per request. We will respond within 30 days of receiving your request, although will require proof of your identify from you before issuing any response. Wherever possible, we will seek to comply with your request. However, there are circumstances where this may not be possible and we will explain our proposed approach to managing your information in this situation.

- 8.3 Should you require further independent information on your rights in relation to personal data, each EU Member State has established a supervisory authority with responsibilities which include providing information on the exercise of rights and the handling of complaints in this area. In the UK and the Netherlands, the respective supervisory authorities are:

United Kingdom

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
United Kingdom

Tel.: +44 (0)1625 545 745

Website: <https://ico.org.uk/>

Netherlands

Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ DEN HAAG
Netherlands

Tel.: +31 (0)70 888 85 00

Website: <https://autoriteitpersoonsgegevens.nl>

9. Final provisions

Changes to this Privacy Statement

- 9.1 We keep our Privacy Statement under regular review. The latest updated version will be published prominently on our website and the document history updated to reflect the changes that have been made.
- 9.2 If at any time we change our approach to collecting and processing the data we hold about you, we will notify you as soon as practicable when appropriate to do so.

Document History

Document Information

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Document Amendment History

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1.0	May 2018	Creation and first publication