

Privacy Notice

Version 1.0 | Effective 22 September 2026

Clifton Commercial Solutions Ltd (company number 17424150), whose registered office is The Old Chapel, 16 Oakfield Road, Clifton, Bristol, England, BS8 2AP, is committed to handling personal information fairly, lawfully and transparently. This Privacy Notice explains how we collect, use, store and share personal information in connection with our website, business communications and non-domestic energy brokerage and procurement services.

This notice applies to personal information relating to customers, prospective customers, business contacts, website visitors and other individuals whose information we process. It applies whether information is obtained through our website, by email, telephone, WhatsApp or other messaging services, through referrals or public business sources, or during the provision of our services.

1. Who we are

Clifton Commercial Solutions Ltd ("Clifton Commercial", "we", "us" or "our") provides non-domestic electricity and gas brokerage, procurement and related support services. For the personal information covered by this notice, we will normally act as a controller, meaning that we decide why and how that information is used.

Privacy enquiries may be sent to us through the contact details published at cliftoncommercial.com or by post to our registered office above.

2. Information we may collect

Depending on how you interact with us, we may collect and use the following categories of personal information:

- identity and business contact information, including name, job title, business name, business address, email address and telephone number;
- communications and enquiry information, including correspondence, call notes, messages and information you choose to provide to us;
- energy account and procurement information, including supply addresses, supplier details, contract dates, meter identifiers such as MPANs and MPRNs, consumption information, bills, quotations and related account information where this identifies or relates to an individual;
- authority and transaction information, including Letters of Authority, instructions, approvals and records relating to energy procurement or supplier contracts;
- website and technical information, which may include IP address, browser or device information, pages viewed, referral information and cookie or analytics data where enabled; and
- marketing and relationship information, including your communication preferences, previous interactions with us and records of objections or opt-outs.

We do not intend to collect special category personal information (such as health information, racial or ethnic origin, religious or philosophical beliefs, or biometric data used for identification) as part of our ordinary services. Please avoid providing such information unless it is genuinely necessary.

3. How we obtain personal information

We may obtain personal information:

- directly from you or from someone acting for your organisation;
- through our website, contact forms, email, telephone, WhatsApp or other agreed communication channels;
- from energy suppliers, aggregators, procurement platforms or other service partners where authorised and appropriate;
- from referrals, introducers or professional contacts; and
- from publicly available business sources, such as company websites, Companies House, professional networking platforms and other legitimate business directories.

Where we obtain personal information from another source rather than directly from you, we will provide or make available the required privacy information within the period required by law. Where we intend to communicate with you, this will normally be provided or linked at the latest when we first contact you. If we intend to disclose the information to another recipient before then, we will provide or make available the required privacy information at the latest when the information is first disclosed. Otherwise, it will be provided within a reasonable period and no later than one month after obtaining the information, subject to any lawful exemption.

4. How and why we use personal information

We may use personal information for the following purposes:

- to respond to enquiries and communicate with customers and prospective customers;
- to establish, manage and maintain our business relationships;
- to obtain account or meter information where authorised, assess requirements, obtain and compare energy quotations and support procurement;
- to communicate with suppliers, aggregators, procurement platforms and other relevant parties in connection with our services;
- to administer Letters of Authority, instructions, contracts, commissions and associated records;
- to provide customer service and assist with queries, renewals or issues relating to services we have arranged;
- to operate, secure, maintain and improve our website and business systems;
- to keep appropriate financial, compliance and business records;
- to prevent or detect fraud, misuse or other unlawful activity;
- to establish, exercise or defend legal claims and protect our legal and commercial interests; and
- to carry out proportionate business-to-business marketing and prospecting where permitted by law.

5. Our lawful bases

Under UK data protection law, we must have a lawful basis for using personal information. Depending on the circumstances, we may rely on:

- Contract – where processing is necessary to take steps at your request before entering into a contract with you personally, or to perform a contract with you. Where the relevant contract is instead with a company or other organisation that you represent, we will normally rely on another appropriate basis, such as legitimate interests, for processing your business contact information;
- Legitimate interests – where processing is necessary for our legitimate business interests, or those of a third party, and those interests are not overridden by your rights and interests. These interests may include providing and improving our services, managing customer and supplier relationships, protecting our business, keeping appropriate records and carrying out proportionate B2B marketing;
- Legal obligation – where we need to process information to comply with a legal or regulatory requirement; and
- Consent – where we specifically ask for and rely on your consent. Where consent is relied upon, you may withdraw it at any time, although this will not affect processing already carried out lawfully.

Where we rely on legitimate interests, we consider the purpose of the processing, whether the processing is necessary and the impact on the individual before relying on that basis.

5.1 When information is required

You are not generally under a statutory obligation to provide personal information to us. However, depending on our relationship with you, certain information may be required under an agreement with us or may be necessary for us to respond to an enquiry, obtain or compare quotations, verify supply details, act under a Letter of Authority or otherwise provide the services you request. If required information is not provided, we may be unable to obtain quotations, progress a procurement or provide the relevant service. We will make clear where particular information is required.

6. Business-to-business marketing

We may contact businesses and relevant business contacts about Clifton Commercial's services where permitted by applicable data protection and electronic marketing laws. This may include using business contact information obtained directly, through referrals or from legitimate publicly available business sources.

We will identify ourselves in marketing communications and provide an appropriate way to object or opt out. We will respect marketing objections and maintain suppression records where necessary so that we can avoid contacting a person again for the same marketing purpose. Different rules may apply to limited companies and other corporate bodies compared with sole traders and certain partnerships, and we will apply the relevant rules to the type of recipient and communication involved.

7. Sharing personal information

Where necessary for the purposes described in this notice, we may share personal information with:

- energy suppliers and their authorised representatives;
- aggregators, sub-brokers, procurement platforms and other partners used to obtain quotations or provide our services;
- IT, website, communications, cloud storage, CRM and other technology providers acting on our behalf;

- professional advisers such as accountants, insurers, solicitors and compliance advisers;
- payment, banking or financial service providers where relevant;
- regulators, public authorities, law-enforcement bodies or other parties where disclosure is required or permitted by law; and
- a purchaser, investor, lender or adviser in connection with a genuine sale, reorganisation, financing or transfer of all or part of our business, subject to appropriate confidentiality and data protection safeguards.

We do not sell personal information. Where another organisation processes personal information on our behalf, we take reasonable steps to ensure appropriate contractual and security arrangements are in place.

8. International transfers

Some service providers or technology systems we use may process or store personal information outside the United Kingdom. Where UK data protection rules on international transfers apply, we will use an appropriate lawful mechanism, such as applicable UK adequacy regulations or appropriate safeguards permitted by UK data protection law. Where relevant, you may contact us for further information about the safeguards used and how to obtain a copy of them.

9. How long we keep personal information

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, including to provide our services, manage customer relationships, meet legal, accounting, tax, regulatory or compliance requirements, resolve disputes and establish or defend legal claims.

Retention periods vary depending on the type of information and the relationship concerned. In deciding how long to retain information, we consider the nature and sensitivity of the information, the purpose for which it is used, contractual and supplier requirements, relevant limitation periods and any applicable legal or regulatory obligations. Information that is no longer required will be securely deleted, anonymised or otherwise disposed of as appropriate.

10. Security

We take reasonable technical and organisational measures designed to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. Access to personal information is limited to those who reasonably need it for legitimate business purposes. No method of electronic transmission or storage is completely secure, so absolute security cannot be guaranteed.

11. Cookies and website information

Our website may use cookies and similar technologies that are necessary for the website to operate and, where enabled, to understand website usage or improve performance. Where consent is required for non-essential cookies, we will request that consent before those cookies are set. Website cookie controls may provide further information and allow you to accept, reject or manage non-essential cookies. You can also manage cookies through your browser settings, although disabling some cookies may affect website functionality.

The specific cookies and technologies used on our website may change as the website develops. Where appropriate, further cookie information or controls may be provided through the website.

12. Your data protection rights

Depending on the circumstances and the lawful basis relied upon, you may have rights to:

- ask for access to personal information we hold about you;
- ask us to correct inaccurate or incomplete personal information;
- ask us to erase personal information in certain circumstances;
- ask us to restrict the processing of personal information in certain circumstances;
- object to processing based on legitimate interests;
- object at any time to the use of your personal information for direct marketing;
- receive certain personal information in a portable format, where the right to data portability applies; and
- withdraw consent at any time where our processing is based on consent.

Your right to object to direct marketing

You have the right to object at any time to the use of your personal information for direct marketing. If you object, we will stop using your personal information for that purpose. We may retain limited suppression information so that we can respect your objection in future.

These rights are subject to conditions and exemptions under data protection law. We may need to verify your identity before responding to a request. We will normally respond within the period required by law and do not ordinarily charge a fee, although the law allows a reasonable fee or refusal in certain circumstances, for example where a request is manifestly unfounded or excessive.

13. Complaints

If you have concerns about how we use your personal information, please contact Clifton Commercial first so that we can try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. Current contact details and guidance are available at ico.org.uk. You may make a complaint to the ICO without first raising it with us, although the ICO may ask whether you have given us an opportunity to address your concerns.

14. Automated decision-making

We do not currently use personal information to make decisions about individuals solely by automated means where those decisions produce legal or similarly significant effects. If this changes, we will update this notice and provide any additional information required by law.

15. Children

Our services are intended for businesses and business representatives, not children. We do not knowingly seek to collect personal information from children through our energy brokerage services.

16. Third-party websites and services

Our website or communications may contain links to third-party websites or services. Those organisations are responsible for their own privacy practices, and their privacy notices should be reviewed separately. This notice does not govern personal information processed independently by third parties.

17. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our services, systems, legal requirements or business practices. The current version will be made available through our website. Where a change materially affects how we use personal information, we will take reasonable steps to bring the change to the attention of affected individuals where required.

18. Contact details

Clifton Commercial Solutions Ltd

Company number: 17424150

Registered office: The Old Chapel, 16 Oakfield Road, Clifton, Bristol, England, BS8 2AP

Website: cliftoncommercial.com

Privacy enquiries: please use the current contact details published on our website or write to the registered office above.

Document control

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