

Privacy Policy

Commercial Energy Solutions Ltd (“CES”, “we”, “us”, “our”) Last updated: 15 May 2026

This Privacy Policy explains how Commercial Energy Solutions Ltd collects, uses, stores and protects personal data when you use the CES Billing Portal at **billcesgb.com** (the “Portal”) and our related services. It applies to your interaction with us in your capacity as a business customer or an authorised user acting on behalf of a business customer.

This Policy is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who we are

Data Controller	Commercial Energy Solutions Ltd
Registered office	CES House, 2b Manor Road, Beckenham, BR3 5LE, United Kingdom
Companies House number	06257655
ICO registration number	ZB326783
Contact for data protection enquiries	info@cesgb.com
Phone	0203 750 0853

CES is not required to appoint a Data Protection Officer (DPO) under Article 37 because we do not engage in large-scale systematic monitoring of individuals or large-scale processing of special category data.

2. What personal data we collect

We collect and process the following categories of personal data when you use the Portal or interact with our services:

Account and contact data

- First name and last name of authorised users
- Business email address
- Business phone number (optional)
- Account password (stored only as a one-way bcrypt hash, never readable to us)

Authentication and session data

- Login times and dates
- IP address at time of login
- Browser session token (used for authentication during a session)

Service-use data

- Records of which reports you access and when
- Records of which downloads you make
- Audit log entries of significant actions you take in the Portal (uploads, deletions, downloads)

Customer business data

- Your company name, supply addresses, MPAN/MPR/SPID identifiers
- Energy consumption figures (half-hourly and aggregated)
- Copies of energy invoices and supplier statements
- Bill validation reports and occupancy analyses produced for you

We do **not** collect any **special category personal data** (such as data about health, race, religion, political opinions, biometric data, or sexual orientation) and you should not provide any to us through the Portal.

3. Why we process this data and the legal basis

PURPOSE	LAWFUL BASIS (UK GDPR ARTICLE 6)
To deliver the bill validation services described in your contract with CES	Article 6(1)(b) – performance of a contract
To authenticate users and secure account access	Article 6(1)(b) – performance of a contract
To detect, prevent and investigate fraud or misuse of the Portal	Article 6(1)(f) – legitimate interests (protecting our systems and our customers)
To comply with our legal and accounting obligations	Article 6(1)(c) – legal obligation
To respond to your enquiries or support requests	Article 6(1)(b) – performance of a contract

We do not rely on consent (Article 6(1)(a)) as a lawful basis for the core services and do not therefore require you to grant or withdraw consent for the Portal to function.

4. Who we share your data with

We do **not** sell your personal data and we do **not** share it with third parties for marketing purposes.

We share personal data with the following processors, who are contractually bound by Data Processing Agreements to handle the data only on our instructions:

RECIPIENT	ROLE	LOCATION OF PROCESSING	SAFEGUARD
Supabase Inc.	Database, authentication, file storage	Republic of Ireland (eu-west-1)	UK-EU adequacy decision; signed DPA on file
Amazon Web Services, Inc.	Infrastructure hosting (sub-processor of Supabase)	Republic of Ireland	UK-EU adequacy; Supabase DPA covers AWS sub-processing
Netlify, Inc. (or your eventual host)	Website / portal hosting	Subject to host's region	[confirm region; SCCs if outside UK/EU]
Anthropic PBC (if/when the LLM chatbot is enabled – Phase 8)	Question answering over report data	United States	Standard Contractual Clauses; documented in DPA

We may also share personal data with HMRC, the Information Commissioner's Office (ICO), or law enforcement if legally required to do so.

5. International transfers

Your personal data is processed within the European Economic Area (Republic of Ireland) by Supabase and its sub-processor AWS. Because the UK has an adequacy decision in place with the EU, this is treated as an intra-area transfer and no additional safeguards are required.

If any future processor is located outside the UK/EEA, we will rely on Standard Contractual Clauses (SCCs) and conduct a Transfer Impact Assessment (TIA) before that processor is engaged. We will update this Policy to disclose the processor and the safeguard.

6. How long we keep your data

We keep your personal data only for as long as is necessary for the purposes set out in this Policy, in line with our Retention Policy (separate internal document, summarised here):

DATA CATEGORY	RETENTION PERIOD
Authentication credentials (active accounts)	For the duration of the contract
Authentication credentials (closed accounts)	30 days after account closure, then deleted
Bill validation reports and supporting data	7 years after the end of the contract (matches UK financial records retention under the Companies Act 2006)
Audit log entries	2 years from event date
Customer correspondence and support tickets	3 years from last interaction
Marketing / mailing list data (if you join)	Until you unsubscribe

After the retention period expires, personal data is either deleted or anonymised. Aggregate, anonymised data may be kept indefinitely for analytical and benchmarking purposes.

7. Your rights

Under the UK GDPR you have the following rights:

- **Right of access (Article 15)** – to obtain confirmation of what personal data we hold about you and a copy
- **Right to rectification (Article 16)** – to have inaccurate data corrected
- **Right to erasure (“right to be forgotten”, Article 17)** – to have your data deleted in certain circumstances
- **Right to restriction of processing (Article 18)** – to limit how we use your data in certain circumstances
- **Right to data portability (Article 20)** – to receive a copy of your data in a structured, commonly used, machine-readable format
- **Right to object (Article 21)** – to object to processing based on legitimate interests
- **Right not to be subject to automated decision-making (Article 22)** – we do not currently make any automated decisions with legal or similarly significant effects

To exercise any of these rights, contact us at info@cesgb.com. We will respond within one calendar month. There is no fee unless your request is manifestly unfounded or excessive (in which case we may charge a reasonable administrative fee or refuse to act).

You also have the right to lodge a complaint with the supervisory authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Phone: 0303 123 1113 · Website: ico.org.uk

8. Security

We take the security of personal data seriously and implement appropriate technical and organisational measures to protect it, including:

- All data in transit is encrypted using TLS 1.2 or higher
- Passwords are stored as one-way bcrypt hashes, never readable by us
- Database access is controlled by Row-Level Security policies enforced at the database level
- Strict Content Security Policy on the Portal to prevent unauthorised script execution
- Sandboxed iframe rendering of customer reports to isolate browser sessions
- Multi-factor authentication on administrative accounts
- Audit log of all significant Portal activity
- Auto-logout after 30 minutes of session inactivity
- File type and content validation on all uploads
- Quarterly review of access permissions and security configuration

A full description of our security measures is available in our internal security documentation, which can be shared with customers on a confidential basis upon request.

9. Cookies and similar technologies

The Portal uses **localStorage** (a browser storage mechanism) to keep you signed in across page navigations within a session. This is classed as “**strictly necessary**” under the Privacy and Electronic Communications Regulations (PECR) and does not require consent – without it, the Portal cannot function.

We do not use third-party analytics cookies, advertising cookies, or tracking cookies on the Portal.

10. Children

The Portal is a business service and is not directed at children. We do not knowingly collect personal data from anyone under 18. If we become aware that we have inadvertently collected such data, we will delete it.

11. Changes to this Policy

We may update this Policy from time to time. When we make material changes we will:

- Update the “Last updated” date at the top
- Notify customers via email at the primary contact address on file
- Highlight the change at the top of the Policy for at least 30 days

Continued use of the Portal after a change indicates acceptance of the updated Policy.

12. ICO registration

Commercial Energy Solutions Ltd is registered with the Information Commissioner’s Office as a Data Controller under the Data Protection (Charges and Information) Regulations 2018.

Registration reference	ZB326783
Date registered	21 April 2022
Registration expires	20 April 2027 (renewed annually)
Registered entity	Commercial Energy Solutions Ltd, CES House, 2B Manor Road, Beckenham, Kent, BR3 5LE
Issuing authority	Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Verify	Search “Commercial Energy Solutions” at ico.org.uk/ESDWebPages/Search

A copy of our current registration certificate is available on request from info@cesgb.com, or can be viewed at: /CES_ICO_Registration_Certificate.pdf

13. Contact us

For any questions about this Privacy Policy or about how we handle your personal data, contact:

Data Protection Enquiries

Commercial Energy Solutions Ltd
CES House, 2b Manor Road, Beckenham, BR3 5LE
Email: info@cesgb.com · Phone: 0203 750 0853

This document was last reviewed on 15 May 2026. Next scheduled review: 15 May 2027

Data Protection Registration Certificate

Commercial Energy Solutions Ltd

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2B Manor Road
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Kent, BR3 5LE

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Issued by: Information Commissioner's Office,
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