

Procurement Gurus Energy - App Privacy Policy

Effective date: 11 October 2026

1. Who we are

Moore Bros. Procurement Limited, trading as Procurement Gurus ("we", "us"), is the data controller for personal data processed through the Procurement Gurus Energy app. We are a company registered in Ireland, company number 782321.

Contact	Details
Privacy officer	Luke Moore
Email	Luke.Moore@procurementgurus.ie
App enquiries	energy@procurementgurus.ie
Phone	+353 83 338 9441
Post	130 Greenpark Meadows, Mullingar, Co. Westmeath, N91 N8X7, Ireland

We have not appointed a Data Protection Officer, because we do not fall within the categories that must appoint one under Article 37 of the GDPR.

2. What this policy covers

This policy covers personal data processed through:

- the Procurement Gurus Energy mobile app (Android and iPhone);
- the secure staff dashboard our team uses to handle your enquiries; and
- the service emails we send about your enquiries.

Our website www.procurementgurus.ie is covered by our separate Website Privacy Policy and Cookie Policy. We apply the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Acts 1988 to 2018. For users in the United Kingdom, we also apply the UK GDPR and the Data Protection Act 2018.

3. What the app does

The app is free. It lets a business upload its electricity and gas bills so that Procurement Gurus can review its energy costs. We may then prepare a benchmark or a proposal and ask energy brokers and suppliers for quotations.

- Uploading a bill, viewing a proposal or asking for a discussion **never** accepts a supply contract or authorises a change of supplier. Any contract is a separate step that you take directly with the supplier.
- Figures in benchmarks and proposals are estimates. **Savings are not guaranteed.**
- The app is intended for businesses. You confirm that you are authorised to submit bills on behalf of the business.

4. Personal data we collect

We collect only what we need to handle your energy enquiry. We will tell you before we collect anything beyond what is listed here.

Category	Examples	Where it comes from
Account details	First and last name, email address, company name, phone number (optional), preferred language	You, when you create your account
Site details	Site name, site address (optional), energy type (electricity, gas or both)	You
Bills	Photos, PDFs and other files of your bills, with file details (name, size, type, number of pages and a digital fingerprint used to spot duplicates and protect integrity)	You
Bill details	Supplier, account holder and company on the bill, account number, meter numbers (MPRN/GPRN), supply address, tariff, bill date and billing period, meter reading type, consumption, unit rates, standing, capacity and other charges, PSO levy, carbon tax, VAT, totals, contract end date	Our staff read your bills and record these details; you can suggest corrections
Enquiry records	Messages with our team, information requests and your replies, call requests and your preferred contact times, benchmarks and proposals, the brokers or suppliers we contacted for you, and internal notes our staff make about your enquiry	You and us
Email records	Which service emails we sent you and whether they were delivered or bounced	Our email provider
Sign-in and security data	Email verification codes (stored only in scrambled form), sign-in times, IP address and device or browser type in our hosting provider's logs, a record of key actions taken on your enquiry	Created automatically when you use the app

Bills can contain personal data about other people, such as a named account holder. Please upload only bills you are entitled to share.

We do not collect your location, contacts, advertising identifiers or analytics data. The app contains no advertising or third-party tracking. We do not ask for special category data (such as health data), and you should not include it in messages.

Photos taken with a phone can contain hidden details, such as the date and place they were taken. If you prefer not to share these, upload a PDF of the bill or a screenshot instead.

5. Why we use your data and our legal bases

We use personal data only for the purposes below, each with a legal basis under Article 6 of the GDPR.

Purpose	Legal basis (Article 6 GDPR)
Creating and running your account; verifying your email address	Steps at your request before a contract, and performing our service to you (6(1)(b))
Reading your bills, preparing benchmarks and	Steps at your request before a contract (6(1)(b))

Purpose	Legal basis (Article 6 GDPR)
proposals, and seeking quotations for you	
Sending service emails about your enquiry (confirmations, information requests, proposals ready)	Performing our service to you (6(1)(b))
Keeping the app secure, preventing misuse, and keeping a record of actions on your enquiry	Our legitimate interests in protecting the service and your data (6(1)(f))
Keeping records of the advice and proposals we gave, and defending legal claims	Our legitimate interests (6(1)(f)) and, where the law requires records, legal obligation (6(1)(c))
Complying with the law, court orders and requests from authorities	Legal obligation (6(1)(c))

Where we rely on legitimate interests, we have balanced them against your rights. You can object at any time (see section 11).

We do not send marketing from the app. If we ever want to, we will ask for your consent first, and you can withdraw it at any time.

6. How your bills are read

Your bills are read by our own authorised staff, who record the details by hand. You can see those details in the app and suggest corrections. We do not send your bills to artificial-intelligence (AI) services, and we do not use them to train AI models.

- Each uploaded file goes through an automatic check of its file type and structure. Files that fail the check are not shown in the app. The check protects our systems and makes no decision about you.
- We make no decisions about you based solely on automated processing, including profiling, within the meaning of Article 22 of the GDPR.
- When we need more information, a member of our team contacts you through the app or by email.

7. Who we share your data with

We do not sell your personal data or use it for advertising. Only authorised Procurement Gurus staff can see your bills, and each is bound by confidentiality.

Service providers (processors). These companies process data only on our instructions, under a written data-processing agreement:

Provider	What they do for us	Data involved
Supabase	Hosting, database, private file storage and sign-in	All app data; stored in the EU (Frankfurt, Germany)
Resend	Sending service emails, including sign-in codes	Your name, email address, company, site name, enquiry reference and the email content, which can include messages from our team and proposal figures. Bills are never attached to emails. Emails are sent from Resend's Ireland region, and we do not track whether you open emails or click links.
Microsoft 365	Our business mailbox	Emails you send us, and our internal alerts about new enquiries and messages, which include your

Provider	What they do for us	Data involved
		name, company, email, phone and message text

We do not use a customer-relationship (CRM) system for app data.

Energy brokers and suppliers. When you submit an enquiry, we ask brokers and suppliers in our network for quotations. We share what a quotation needs, which may include a copy of your bill, your meter numbers, consumption, company name, site address and contract end date. We record each disclosure against your enquiry. Brokers and suppliers use this data under their own privacy policies. Sharing it does not commit you to anything. If you would prefer us not to send a copy of your bill, tell us in a message before or after you submit.

Others. We may also disclose data:

- where the law requires it, or for legal proceedings;
- to establish, exercise or defend our legal rights; and
- to a buyer or potential buyer of our business, under confidentiality.

Apple and Google distribute the app through their stores. They process data about your download and device under their own privacy policies.

8. Transfers outside the European Economic Area

Your app data and bills are stored in the EU. Some of our providers are based in the United States, or may give their support staff access from outside the European Economic Area (EEA). Where personal data leaves the EEA, we protect it with one of these safeguards:

- an adequacy decision of the European Commission, including the EU-US Data Privacy Framework where the provider is certified; or
- the European Commission's Standard Contractual Clauses, with extra measures where needed.

You can ask us for details of the safeguard for each provider.

9. How long we keep your data

We keep personal data only as long as we need it for the purpose we collected it for, or as the law requires.

Data	How long
Unfinished draft enquiries and their files	Deleted automatically after 30 days
Your account, enquiries, bills, messages and proposals	While your account is open. Closed enquiries: 6 years after the enquiry closes, in line with the limitation period for contract claims in Ireland. They are then deleted automatically, with their bills and proposal documents.
Record of actions on an enquiry (security log)	Kept to protect the service. After you delete your account it holds only internal identifiers and enquiry references, with no name, email or bills.
Service email records	Kept with the enquiry they relate to and deleted with it
Backups	Our current hosting plan does not keep separate backups, so deleted data cannot be recovered. If we add backups, we will update this policy and state how long they are kept.

When you delete your account, your data is deleted as described in section 12. We will tell you if we ever need to keep data for longer, for example because of a legal claim.

10. How we protect your data

- Data is encrypted in transit (HTTPS) and stored encrypted at rest by our hosting provider.
- Bills and proposal documents are kept in private storage. Only you and our authorised staff can open them, and there are no public links to them.
- Staff must sign in with multi-factor authentication. Each staff member sees and changes only what their role allows.
- Key staff actions on your enquiry (status changes, messages, bill details, broker contacts and published proposals) are recorded.
- Uploaded files are safety-checked before staff open them.
- You can lock the app with your phone's fingerprint, face recognition or passcode. That check happens on your phone; we never receive your biometric data.

No system is completely secure. If a personal data breach is likely to put your rights at risk, we will tell the Data Protection Commission within 72 hours and, where the risk is high, tell you without undue delay.

11. Your rights

Under the GDPR you have the right to:

Right	What it means
Be informed	Know how we use your data (this policy)
Access	Get a copy of the personal data we hold about you
Rectification	Have inaccurate data corrected. You can also correct bill details in the app when we ask for more information.
Erasure	Have your data deleted (see section 12)
Restriction	Ask us to limit how we use your data while a concern is checked
Data portability	Receive data you gave us in a common machine-readable format
Object	Object to processing based on our legitimate interests
Withdraw consent	Where we rely on consent, withdraw it at any time, without affecting earlier processing

To use any right, email Luke.Moore@procurementgurus.ie or energy@procurementgurus.ie, or write to the address in section 1. We may ask you to confirm your identity. We reply within one month. In complex cases we may extend this by up to two further months, and we will tell you why. Using your rights is free, unless a request is clearly unfounded or excessive.

12. Deleting your account and data

You can delete your Procurement Gurus Energy account and its data at any time, free of charge.

In the app (immediate):

1. Open the app and sign in.
2. Tap **Profile & settings**.
3. Tap **Delete my account**.

4. Type DELETE to confirm, then tap **Delete permanently**.

Without the app: email energy@procurementgurus.ie from the email address on your account, with the subject "Delete my account". We will confirm your identity and delete your account within one month, usually within 5 working days.

What happens	Details
Deleted straight away	Your profile and sign-in, all enquiries, uploaded bills, bill details, messages, call requests, proposals and proposal documents, broker records and service email records
Kept in pseudonymous form	Our security log of key actions and a record that the deletion took place. These hold internal identifiers and enquiry references, not your name, email or bills. We keep them to protect the service and show that we met our obligations.
Sign-in logs	Our hosting provider keeps technical sign-in logs (time and IP address) for a limited period for security, after which they are deleted
Emails already sent	Copies stay in your own inbox, in our business mailbox and in our email provider's logs for its standard retention period
Backups	None kept: our current hosting plan does not keep separate backups
Brokers and suppliers	If we shared details with them for a quotation, we will tell them about your deletion request where possible. They hold that data under their own privacy policies.

We may keep specific records for longer only where the law requires it, for example for an ongoing legal claim. If so, we will tell you what we kept and why.

If you only want some data deleted, such as one enquiry or a bill, email us instead of deleting your whole account.

13. Children

The app is for businesses and is not intended for anyone under 18. We do not knowingly collect personal data from children. If we learn that we have, we will delete it as soon as possible. A parent or guardian can contact our privacy officer using the details in section 1.

14. Cookies, tracking and phone permissions

The app does not use cookies, analytics, advertising or tracking tools. It stores on your phone only what it needs to keep you signed in and remember your settings, such as your language and app lock.

The app asks for these permissions only when you use the feature:

Permission	Used for
Camera	Taking photos of your bill
Photos	Choosing existing photos of your bill
Fingerprint or face recognition	Unlocking the app, if you turn on app lock (your phone's passcode also works)

You can refuse or withdraw any permission in your phone's settings. The app still works, and you can upload bills as files instead.

15. Complaints

If you are unhappy with how we handle your personal data, please contact us first using the details in section 1, so we can try to put it right.

You also have the right to complain to a supervisory authority at any time. In Ireland this is the Data Protection Commission (www.dataprotection.ie, where its current contact details are listed). You can also complain to the authority in the EU country where you live or work, or where you believe the breach happened.

16. Changes and contact

We will update this policy when the app or the law changes, and show the new effective date at the top. If a change materially affects how we use your data, we will tell you in the app or by email before it takes effect.

Questions about this policy or your data: Luke Moore, privacy officer, Luke.Moore@procurementgurus.ie, +353 83 338 9441, 130 Greenpark Meadows, Mullingar, Co. Westmeath, N91 N8X7, Ireland.