

# Yorkshire Water Privacy Notice



YorkshireWater

# 1. Who we are

Yorkshire Water provides households in Yorkshire with water and waste water services. It is part of the Kelda Group. For the purposes of Privacy Law, the data controller is Yorkshire Water Services Ltd Registered Company Number 2366682 registered at Western House, Halifax Road, Bradford BD6 2SZ.

# 2. Changes to our Privacy Notice

We review this notice regularly as part of our internal processes or as our services, activities, or regulatory requirements change. It's subject to change at any time, but the most up to date version is published on [yorkshirewater.com/privacy](http://yorkshirewater.com/privacy)

This notice is dated 24th May 2018.

# 3. Contacting us

If you'd like to request further information about our privacy policy or exercise any of your rights, you can contact us by:



email to [Dataprotectionofficer@yorkshirewater.co.uk](mailto:Dataprotectionofficer@yorkshirewater.co.uk)



post to **Data Protection Officer, Kelda Group, Western House, Halifax Road, Bradford BD6 2SZ**

We take any concerns we receive very seriously. If you think our collection or use of your personal information is unfair, misleading or inappropriate, please bring it to our attention. We'll investigate and respond to your concerns including any additional information or explanations needed. We also welcome suggestions for improving our procedures. If you are unhappy with our response you can request our Data Protection Officer to review the case.

The Information Commissioner's Office (ICO) regulates adherence to Privacy Law. For information, advice or to make a complaint you can:



go to the ICO website [ico.org.uk](http://ico.org.uk)



write to **The Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF**; or



call them on **0303 123 1113**

\*Privacy Law means the Data Protection Act 1998 (as amended by the Data Protection Act 2018 ), the EU Data Protection Directive 95/46/EC, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, the General Data Protection Regulation (from 25 May 2018) and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority;

## 4. Your privacy rights

You have rights relating to your personal information. You can find more information about your privacy rights on the Information Commissioner's Office website [ico.org.uk](https://ico.org.uk)

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

### 1. The right to be informed

You have the right to be informed about how and why we process your personal information.

Any time you give us personal information you have the right to be informed about why we need it and how we'll use it.

You can find most of the information you need in this Privacy Notice.

If you have any questions please contact us [yorkshirewater.com/contactus](https://yorkshirewater.com/contactus)

### 2. The right of access

You have the right to access your personal information

You can request a copy of information we hold about you at any time.

We'll try to deal with your request informally, for example by providing you with the specific information you need over the telephone providing we have the satisfactory evidence of your identity and the information you are requesting.

You can however formally request access to the personal information we hold about you by getting in touch through any of our customer service channels, but we'll ask you to provide evidence of your identity before we process your request. We may also contact you to clarify your request or to ensure we have all the information we need to fully meet your request.

Privacy Law requires us to respond to your request within 30 calendar days of verifying your identity (or within three months for more complex cases). You'll receive a full response as soon as we can reasonably provide one and we aim to resolve all subject access requests within 30 calendar days from confirming your identity. In more complex cases where we cannot provide a full substantive response within that time frame, we'll write to you within 30 calendar days to explain why an extension is needed.

We don't charge for subject access requests.

### 3. The right to rectification

You have the right to ask us to correct inaccurate personal information we hold about you.

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it or complete it at any time, through any of our customer service channels. Wherever possible, we'll correct inaccurate or incomplete information immediately.

In more complex cases we'll take reasonable steps to confirm the accuracy of the information we hold. Whilst we investigate the accuracy of the information, we'll restrict the processing of the information in question.

We'll let you know the outcome of our investigation as soon as we can. Any information we can verify as inaccurate will be corrected within one month of receiving your request.

## 4. The right to erasure

You have the right to ask us to delete your personal information.

In some circumstances you have the right to ask us to delete information we hold about you. For example, if we have asked for your consent to process the information, and you withdraw that consent.

We'll respond to your request as soon as we can and we'll act on any requests granted within one month of your request.

We can't delete any information where we have a legal or regulatory obligation to keep it. This applies to all outstanding debts or anything in connection with our Water Supply Licence (e.g. water quality concerns related to the water supply for your property). We may also refuse your request if we believe it to be excessive. If your request for deletion is refused, we'll explain the reasons for refusal.

## 5. The right to restrict processing

You have the right to ask us to restrict the use of your personal information.

In some instances, you have the right to ask us to restrict the use of your personal information (for example if you've challenged the accuracy of the information we hold, or have objected to our processing). We'll restrict our use of your information whilst we investigate your objection or request to correct your information.

We'll respond to your request as soon as we can and we'll act on any requests within one month of your request.

If your objection is unsuccessful, we'll only continue processing once we've let you know the outcome of the investigation.

When processing is restricted, we are still permitted to store your personal data, but not use it. Information related to these requests will not be automatically deleted unless you expressly ask us to.

## 6. The right to data portability

You have the right to data portability.

You have the right to move, transfer or copy data to another system for your own purposes. However, this right only applies where processing is automated and consent based.

## 7. The right to object

You have the right to ask us not to process your personal information.

We process most of the information we collect about you under the lawful basis of 'public task' or 'legitimate interest'. You have the right to object to our processing your personal information under these lawful bases (including for marketing purposes and profiling).

We will respond to your objection as soon as we can, detailing any actions we can reasonably make. If we believe there is an overriding compelling reason to continue the processing, we will explain why we think this is.

We'll action any requests to stop direct marketing as soon as we receive your objection.

You can object to us using your data at any time through any of our contact channels.

## 8. Rights in relation to automated decision making and profiling.

You have the right to request not to be subject to a decision based solely on automated processing, including profiling, which has an adverse effect on you.

We will consider any requests regarding automated decision making, including profiling, as soon as we receive your request.

## 5. Lawful basis for processing

Privacy Law states we must have a lawful basis for processing your information. We have identified the legal bases on which we process your information, and this varies depending on how and why we have your information. The legal bases we use are:

- **Public Task:** if the processing is necessary for the performance of our public tasks as a water company (e.g. arranging and maintaining your water supply and waste water services, billing and account management, collecting debt, maintaining our infrastructure);
- **Consent:** if you've given consent for us to process your personal information (e.g. in relation to certain support schemes or in relation to certain marketing activities);
- **Legitimate interest:** if the activities are for our business purposes and do not impede your rights as data subjects (e.g. carrying out market research or customer satisfaction surveys to improve our service to you, data sharing with credit reference agencies, fraud prevention and detection, ensuring network information and public security etc.);
- **Contracts:** where our processing is necessary for the performance of a contract where you are a party to the contract;
- **Legal obligations:** if the processing is necessary for compliance with one of our legal obligations (e.g. we're required to provide certain contact information and other details about our services to Ofwat, the Consumer Council for Water and the Water Redress Scheme (WATRS));
- **Vital interests:** we may need to process your personal information to protect your vital interests (e.g. because there is a risk to you and your household due to water quality issues or where the water supply has been disrupted).

If we process any special category information i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, health data, or data concerning your sex life or sexual orientation, we must have a further lawful basis for the processing. These further legal bases include where:

- you give us your explicit consent to process your special category information (e.g. in relation to a support scheme);
- the processing is necessary to protect your vital interests or someone else's vital interests;
- you make the information public;
- the processing is necessary for a legal claim (e.g. because you've failed to pay your bill);
- the processing is necessary for reasons of substantial public interest (e.g. where we suspect fraud on the part of a customer); or
- the processing is necessary for reasons of public interests in the area of public health (e.g. to manage a water quality incident or contamination).

## 6. Information we collect from you and what we do with it

### Yorkshire Water supplies and waste water services

Most of the information we collect from you or about you is to help us manage your water account with us and to make account management decisions according to your needs. We'll use this information to bill you for the water supply and waste water services. We may process your information differently if you request other products or services from us.

To provide our services to you, we need to collect, process and store a variety of information about you that may be personal or sensitive in nature. In most cases, the information we collect is provided by you directly. This is one of the ways we can ensure the information we collect is as accurate and up to date as possible. We'll usually do this when you first contact us, and we may ask you to confirm your details on subsequent contacts from time to time. We use your information to manage your account, administer support schemes, improve and develop our business generally, to provide statistical information to meet our regulatory requirements and to enforce our legal rights. If we intend to use your information for a different purpose, we'll do so in ways consistent with Privacy Law or, wherever possible, by notifying you in advance.

We'll only use your information for the specific purpose(s) for which it has been provided to us or collected by us.

The type of information collected from you and obtained about you will vary depending on your relationship with us, the service you are requesting and your chosen method of contacting us.

If you contact us to report a leak, a problem with your water supply or your waste water service, we'll need to investigate. This means that we may call you and discuss your concern. We'll keep you informed of planned visits and of any results we find by letter or by telephone, unless you ask us not to. We may need to share your data with our affiliated partners who may attend the location and will assist us to resolve the matter as soon as possible.

For billing and account management purposes we are likely to ask you to provide:

- name, address and date of birth – to verify your identity and help us prevent fraud;
- contact details (including phone number, e-mail address or social media identifiers) – to contact you about your account, update you about the services you've requested or receive from us, inform you about service interruptions, or contact you with other information related to our business;
- financial information (including method of payment and bank account details) – to bill you for the services you receive from us and manage your payment arrangements;
- household information (including for example address occupancy, employment status etc.) – to help us understand your potential water consumption and to apply the most appropriate tariff and payment plan for your water account.

We also collect information about you from other sources as detailed below in section 7

If you need more help from us in relation to the services we provide, or with paying your bill, we may request additional information from you. This may include:

- National Insurance number – to assist with payment of your water bill directly through your benefit arrangement (Water Direct);
- household income and expenditure, receipt of benefits (value and type), number and age of children – to assess your suitability for support schemes you may have applied for or that may be available to you, including our Water Sure, Water Support and other support schemes;
- disability, medical conditions and prescriptions – if you wish to register for one of our support schemes, priority services (see below), and to assist in managing supply interruptions and emergency planning. (We'll only collect sensitive personal information about you with your explicit consent, and for a specified purpose which will be explained to you at the time).

We may ask you for documented evidence of the above and will keep digital copies for validation and audit purposes.

More detailed information on what we collect in different circumstances and how it will be used is set out below.

### **Yorkshire Water Priority Services Customers**

Priority Services customers may need additional assistance either in communicating with us or in the event of a water supply disruption. Priority Service customers include people with physical or mental impairments / medical conditions or who have a young family and may not be able to easily leave their home to collect bottled water or who have a significant need for water. We may contact you by telephone, e-mail, text or a physical visit to your home if there is a water disruption issue.

If you identify yourself as a Priority Services customer, we may (with your consent) register you as such on our customer systems so we can identify you when you contact us, to provide you with the service that meets your needs, or where a situation requires us to identify vulnerable or at-risk customers (e.g. supply interruption or public health emergency).

We collect only the minimum information required for these purposes and you do not need to share full details of your condition to be added to the Priority Service Register.

You can be added to or removed from the register if your circumstances change or if you would like to withdraw your consent. You can do this at any time through any of our customer services channels.

In the future, and to provide a more joined up service, we may wish to share our register with other utilities companies or local authorities. We'll only do this if you've consented.

You can find out more about our Priority Services at [yorkshirewater.com/priorityservices](http://yorkshirewater.com/priorityservices)

## **Customers requesting financial support with their water bill**

We have several support schemes to help customers who are in financial difficulty. These schemes are: WaterSure, WaterSupport, Water Direct and Resolve. We will ask for your consent to process your information through our scheme applications.

We also work with other organisations who may refer you to us, if you've contacted them first. This may include local authorities, debt charities including the Yorkshire Water Community Trust, Citizens' Advice Bureaus and advice services such as Stepchange and Christians Against Poverty.

We may request evidence of one or more of the following to support an application and to check against scheme criteria (which may differ depending on the scheme you apply for):

- A medical condition resulting in increased water use
- Child Benefit to show three or more children living at the property under the age of 19
- Income Support
- Jobseekers Allowance (JSA)
- Employment and support Allowance (ESA)
- Housing Benefit
- Child Tax Credit/Working Tax Credit
- Pension Credit
- Universal Credit
- Wage/Self-employed income

We'll keep a copy of this evidence for the lifetime of your receipt of scheme benefits for auditing purposes. If your application is unsuccessful we'll keep a record of your application to assist our business reporting.

You can withdraw from a support scheme at any time by contacting us. We'll keep a record of your application for auditing purposes in line with our retention policy.

## **Falling into arrears or failure to pay your water bill**

If you are falling behind in your water payments, you may be eligible for one of our financial support schemes detailed above. Please get in touch as soon as possible through any of our contact channels so we can discuss your situation.

If you fail to pay your water bill in full, or fall into arrears, the information that we hold about you may be used to recover arrears in line with our regulatory obligations. In doing so we may use third party debt collection / management companies and credit reference agencies to assist us. This will involve sharing your information with them.

## **Yorkshire Water e-billing customers**

If you're an e-billing customer, you can sign in online to see your bills and any outstanding payments and you'll receive email notifications when you have a new bill. We take your email address, water account number, name and postal address when you sign up for e-billing - for more details please see our terms of use [yorkshirewater.com/legal](http://yorkshirewater.com/legal)

Your email address or telephone number may be used to contact you about the water services that we provide. If we want to use your email address to send you direct marketing communications including those of our group companies, we'll ask you to consent to this when you log onto e-billing. It's your choice whether you consent and consent can be withdrawn at any time by contacting us using the details above or using the 'unsubscribe' function in any communication itself.

## **Former household customers - moving out of our supply area**

If you move out of our supply area, your account will be closed once any outstanding balance has been paid. The information relating to your water consumption, charges and payments will be kept in line with our data retention policy for financial auditing purposes. If you still have an outstanding balance we'll keep information associated with your account until your account is closed.

## **Yorkshire Water as a Landlord**

As a landlord, Yorkshire Water will request tenant name, address and contact details (including phone number, mobile number, and email addresses) which will be used to register tenant land interests and update our records. This information is retained on corporate systems and access is limited to our Land & Property department. We won't make your information public unless we're requested or obliged to by an organisation with statutory powers e.g. the Police, Inland Revenue, Valuation Office or Land Registry.

## 7. Information we collect or obtain from others about you

We prefer to collect information directly from you so we can ensure it's as up to date and as accurate as possible. However, we also collect information about you from other sources outside of the Kelda Group. These include:

- credit data and publicly available information about you from Credit Reference Agencies;
- information collected by our business partners or sub-contractors relating to services they are delivering to you on our behalf, or to respond to a concern you have;
- information about you from members of the public (e.g. if someone reports a leak) or other third parties with an association with your property (e.g. landlords, tenants, letting agencies, shared occupiers, previous or future occupiers, family);
- information about you or your property from public bodies (e.g. the Environment Agency);
- opinion data about your preferences, the level of service we provide or on key industry topics, provided to us by market research agencies. All agencies commissioned to undertake this work are done so following the Market Research Society code of practice;
- demographic data from third party sources with access to publicly available information (e.g. parliamentary constituency information).

If you apply for one of our support schemes we may collect additional information from third parties to verify your application. We'll explain if and how we'll do this in the application form or when you contact us.

For non-household customers we may receive information from your retailer or MOSL (Market Operator of England's non-household water retail market) in order for us to deliver water and sewerage services to you.

We also work closely with affiliated partners (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, local authorities, Department for Works and Pensions, debt relief charities and agencies, Citizens' Advice Bureaus, Credit Reference Agencies and debt collection agencies) and may receive information about you from them.

In future, we may also receive information about you from public authorities and other utility companies to improve public service delivery and ensure that priority customers can access available support and discount schemes.

## 8. Information we receive from and share with Credit Reference Agencies

Where you've requested a water supply or service from us, we'll share your personal information (and that of your financial associates) with one or more Credit Reference Agency ('CRAs') and they'll give us information about you. We'll continue to share information about how you manage your account with CRAs for as long as you have an account with us. This data sharing is a condition of our relationship with CRAs and contributes to the effective running of the credit industry.

The information we share includes your identity and, depending on the status of your account with us, your financial situation and financial history. CRAs will supply to us both public (including the Electoral Register) and shared credit, financial situation and financial history information and fraud prevention information. We may also make periodic searches at CRA's depending on your relationship with us, or if you've requested additional services.

We'll use this information to:

- verify the accuracy of the information you've provided to us (including your identity);
- manage your account(s) (including making decisions about how to manage your account if you fall into arrears);
- help detect and prevent financial crime, fraud and money laundering;
- trace and recover debts;
- carry out statistical analysis; and
- to assess or verify whether you may be eligible for any of our support schemes.



We'll continue to exchange information about you with CRAs while you have a relationship with us and, in some circumstances, we may continue to provide information to them for up to six years afterwards. We'll also inform the CRAs about your settled accounts, missed payments, defaults and current balances on your water account. This information may be supplied to other organisations by CRAs.

Information held by CRAs may be linked to other people with whom you have a financial association (e.g. a spouse or partner). These links will remain on your and their files until you or your partner successfully files for a disassociation with the CRAs to break that link.

You can find out more about the CRAs, their roles as credit reference and fraud prevention agencies, the information they hold, the ways in which they use and share personal information, data retention periods and your data protection rights in more detail on the information notices set out on their websites:

**Callcredit** – [callcredit.co.uk/crain](https://callcredit.co.uk/crain)

**Experian** – [experian.co.uk/crain](https://experian.co.uk/crain)

We may also purchase additional information from CRAs for statistical analysis and analytics purposes to assist us with debt management strategies, communication strategies, marketing campaigns, and analytics (e.g. to create and monitor scorecards, models and variables relating to account management and payment trends, fraud, risk or to verify identities, to refine credit and fraud strategies, and for analysis, such as loss / cash forecasting). This may include personal information and modelled data based on expected behaviours, considering demographic and other information.

## 9. Profiling and automated decision making

We use your personal information on its own, in an aggregated anonymous form, or mixed with publicly available demographic information to profile you. We do this to:

- ensure we deliver the best possible service to you;
- use the right method and right message to communicate with you;
- understand how you use water to help our business planning and to keep you informed about your water usage;
- identify service disruption that may affect you.

If your account is in arrears, we will use the information we collect from CRAs to profile you. This includes the use of statistical analysis, credit scorecards, payment trends, behaviour analysis, and demographic information. We do this so we can manage your account and find the best possible solution that fits your needs or situation.

## 10. What to expect when you contact us

If you contact us by phone or in writing (including e-mail, live chat, social media or via our website) we'll record, monitor or keep copies of the correspondence. We keep this information for a number of reasons (including fraud prevention and crime recording/investigation) but the main reasons are to:

- assist our response to any account/supply queries you may have;
- ensure we continue to offer you the best possible service;
- maintain standards and help train our customer relationship managers;
- demonstrate our compliance with regulatory obligations; and
- keep our records up to date so that we don't offer you services that you don't need.

### Contacting us by telephone

When you contact us by telephone, your telephone number may be added to your account so that we can contact you in future. We use a telephone number listed on your account to contact you to discuss your account or text you with reminders to pay unpaid water bills or regarding support scheme applications.

We may also use a telephone number listed on your account to text you if there's a water supply interruption or a waste water issue, work being conducted near your home, or water quality concern. Apart from text messages relating to account arrears and communicating public health issues, you can opt out of future text messages at any time by contacting us.

We record all our inbound and outbound calls with customers. We do this because we are required to show adherence to industry rules and regulations, but we also use call recordings to help coach and train our staff and to improve the quality of the service we offer. On occasions calls may be monitored live.

Call recordings may be provided to the police on request, for example during criminal investigations.

## **Contacting us by post**

All customer post, including enclosures, received by us is scanned electronically on to our systems. Where the post relates to an identifiable water account, we'll store the letter and attachments on that account. The hard-copy post is either returned to the recipient (where original documents have been sent) or destroyed. We aim to do this within five working days but in certain circumstances documents may be retained for longer.

Post is stored and processed in a secure area of the building. The retention of hard-copy documents and electronic images of post received is detailed in our data retention policy.

## **Emailing us**

If you email us, we'll respond to you using the email address you give us. We may add your email address to your account and use it for future communications, but only in line with the relevant legal basis.

Please note that email isn't considered to be a secure communication method. If you have any concerns over the security of your information in transit, please raise this with our customer service representatives who will suggest alternative methods of contact.

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Emails are stored, archived and deleted in line with our information security and data retention policies.

## **Contacting us by Webchat**

If you contact us via live webchat through our website, the conversation will be stored on a third-party system for three months and webchat data will be anonymised and archived. We'll ask you for your e-mail address so we can send you a transcript of the chat.

Once you begin the webchat, our staff will be able to see text that you've typed, even if you've not sent your message. We do not store this text.

## **Contacting us via social media**

We strongly advise not to post your personal contact or other sensitive information on a public social media site. If you contact us using social media to report an issue, we'll ask you to private message us to gather suitable information. We may suggest an alternative contact method if we think this is more appropriate.

## **Making a complaint**

If you make a complaint to us, we'll follow our complaints process, you can find more about this at [yorkshirewater.com/compliments](http://yorkshirewater.com/compliments). We may need to share details about your complaint internally to fully investigate. If you escalate your complaint to The Consumer Council for Water (CCWater) or submit a claim through the Water Redress Scheme (WATRS) we'll share information with them in order to resolve your concern. This exchange of personal data with CWater and WATRS is a legal requirement.

If the complaint relates to a service provided by a third party, we'll share information with them in order to resolve your complaint. If you don't want information identifying you to be disclosed, we'll try not to disclose this. However, it may not be possible to handle a complaint on an anonymous basis.

We'll only use the personal information we collect to process your complaint and to check on the level of service we provide (this may include a visit to you at home). We do compile and publish statistics showing information (for example the number of complaints we receive), but not in a form which identifies any individuals.

We'll keep complaints in line with our data retention policy.

# 11. Visiting our website or using our mobile application

Each time you visit to our website or mobile application we'll automatically collect the following information:

- technical information – This includes the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Location information – When using one of our location-enabled services on our website or mobile applications, we may collect and process information about your actual location. If you wish to use the feature, you'll be asked to consent to your data being used for this purpose. You can withdraw your consent at any time either by modifying the geo-location settings of your web browser or the location awareness permissions of your mobile device;
- Session information – information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
- We use website analytical tools on our site for anonymous reporting of site usage and may use this information for advertising on social media sites. All data collected using analytical tools are deleted after 14 months.

## Information about cookies we use

We use cookies to make our services websites work, or work more efficiently, as well as to collect information. We may obtain information about your general internet usage by using a cookie file which is stored on your browser, your mobile device or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our systems site and to deliver a better and more personalised service. Some of the cookies we use are essential for the services site to operate. We'll not use the data to identify you personally or to make any decisions about you.

More detailed information about the cookies we use can be found here [yorkshirewater.com/legal](http://yorkshirewater.com/legal)

## Third-party links

Our website may also contain links to and from other websites including our partner networks and affiliates. If you follow a link to any of these websites, please note that we do not have control over these websites or their content. These websites have their own privacy policies and we'll not accept any responsibility or liability for these. We recommend that you review the website terms and conditions that are applicable to the third-party website.

## Information about using our online billing platform

You'll need your name, email address, and password to register each time you access your on-line billing account. Do not share your password with anyone else. Our customer service advisors may request your password to reset your on-line account.

We reserve the right to delete or remove online accounts where we deem them to have been misused, duplicated, dormant, unused or invalid for a period of time. Where possible we'll contact you by email when we discontinue any accounts. We'll continue to send your bills through the post.

Full terms of use for our website including the on-line billing platform can be found here [www.yorkshirewater.com/legal](http://www.yorkshirewater.com/legal)

## 12. Capturing images (including CCTV)

We comply with the Home Office Surveillance Camera Code of Practice for all our CCTV usage. If you have any privacy related concerns about our use of CCTV please contact us by email at [Dataprotectionofficer@yorkshirewater.co.uk](mailto:Dataprotectionofficer@yorkshirewater.co.uk) or by post to Western House, Western Way, Bradford BD6 2SZ.

### Visiting our offices

When you sign in to our visitor system at any of our sites your name and other information will be collected. In certain circumstances (e.g. if you intend to regularly visit our premises, or multiple premises) a photograph may be taken and added to our picture archiving and communication system for identity verification purposes.

Our premises are monitored by CCTV so your image may be captured whenever you enter our site boundary. Where the CCTV is located on our premises but near a public space, it may also record these images.

There are signs to show you when you are entering an area monitored by CCTV. CCTV Images are stored in line with our data retention policy.

If you have an accident or incident involving any Health & Safety matters while you are on any of our premises and this is recorded, it may be kept for the purposes of Health & Safety and insurance requirements.

### CCTV on commercial vehicles

Some of our commercial large goods vehicles are fitted with CCTV cameras to improve our drivers' safety and standards, for improved efficiency, and to help us reduce the risk of fraudulent claims for damages or injury in respect of accidents and incidents.

All the vehicles are fitted with clear signs that CCTV is in operation.

### Our use of Unmanned Aerial Vehicles ('UAV's' or Drones)

We use UAVs on our land, sites and assets throughout the Yorkshire region for a wide range of applications. The use of UAVs helps realise multiple benefits for our business and our customers. Yorkshire Water has its own Civil Aviation Authority (CAA) qualified UAV team and an established framework of fully approved external UAV operators. Most of our UAV operations undertaken for, or on behalf, of Yorkshire Water operate within CAA Visual Line of Sight rules, however, some of our operators have additional permissions granted by the CAA due to their experience and expertise. All of our UAV operations are undertaken in accordance with our data protection policies. In addition, our approved external UAV operators are subject to contractual confidentiality agreements as part of the Yorkshire Water operator approval process.

## 13. Information we share with others

There may be some circumstances where we need to share some of your information as part of our day to day management of your account and services, to meet our compliance obligations or where we are permitted to under Privacy Law.

### Group companies

We share your personal information with other members of the Kelda Group to find out more about the Kelda Group visit [keldagroup.com](http://keldagroup.com) We do this to ensure we offer you a comprehensive service across our departments. We share your personal information with Kelda Group employees and access is controlled in accordance with our Information Security Policies.

### The obligations that we have to our Regulators

We have legal obligations to share data with our regulators. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal information to comply with any legal obligation. We do not require your consent to process your information in this way.

We are required to share your contact information with our water regulator Ofwat (and third parties working on their behalf) for the purposes of the water industry's Service Incentive Mechanism ("SIM"). The SIM is a performance reporting framework designed to regulate customer service in the water industry. It's based on customers scoring their experience of the service received by water companies. At Ofwat's request, all customers who contact us may have their contact information passed to a third-party processor acting on their behalf. You may be contacted by this third party about the service you received from us and asked to score our performance. This isn't for marketing purposes. As this is part of our Water Supply Licence Obligation we are required to share your data and are not permitted to remove any contact details. You can't opt out of this sharing arrangement.

We must share any personal data related to a water quality incident with the Drinking Water Inspectorate (DWI). Occasionally if you are part of an incident investigation there is a chance that data may be shared with Health and Safety Executive or the Environment Agency if it's part of the reporting requirements.

If you've escalated a complaint to The Consumer Council for Water, we have a regulatory obligation to provide information related to that complaint. This is likely to include your personal information.

For non-household customers, we must share customer data with the non-household customers' retailer and MOSL. This includes water supply information, details of any contact between us and a non-household customer, and information relating to water supply incidents. What information we share and how it is shared is governed by the Wholesale-Retail Code. You may find out more about how MOSL processes your information here: [mosl.co.uk/privacy-notices](https://mosl.co.uk/privacy-notices)

We have a legal requirement to share information with other water companies where other sewerage companies operate in our supply area (or where we operate sewerage services in another water company's supply area). We have such an arrangement with United Utilities, Severn Trent Water and Northumbrian Water.

Sometimes we are contacted by HMRC, the Department for Work and Pensions, the police, local council authorities, fraud agencies or UK Visas and Immigration asking for information about individual customers. Under Privacy Law, we are permitted to share this data with them without your consent and you'll not be notified that this has been done. This is in the support of the prevention and detection of crime.

### **Agreements we have with other organisations for sharing information**

We share:

- some of your personal information (name, address, residency status) with a Financial Conduct Authority regulated company called Homeserve for the purposes of offering you insurance products related to your water supply and waste water services. They'll confirm to us whether you've taken out an insurance policy so we can assist you if you contact us in future (e.g. about a water leak in your property). You can opt out of receiving these communications at any time through any of our contact channels;
- your payment performance with Experian and CallCredit as part of our credit reference agency membership;
- your payment information (bank account; sort code; direct debit mandates etc) with banking institutions to process your payments;
- your arrears and contact information with selected debt collection agencies when you have not paid your water bill. The debt collection agencies may use your data to contact you or visit your home in fulfilment of their contract with us;
- your contact information with selected companies to conduct market research so that we can understand and improve our quality of service. You may receive a call from them following contact with us to ask about your experience and how you would score us. This isn't a marketing call and your response is very important to us. If you would prefer not to participate in these surveys in future you can let our customer services team know at any time;
- (occasionally) your personal data with our legal advisers or our insurance company or other professional advisors to obtain legal advice or make/defend a claim.

If we sell or buy any business or assets, or merge with another business entity or carry out internal corporate restructuring, your information may be disclosed to new or prospective business partners or owners or the new corporate entities.

## 14. Affiliated Partners we use who may have access to your data

We use affiliated partners to help us process your personal information and provide services to you including to:

- manage mains replacement and pipe repairs or fit new meters. They, their employees and subcontractors have access to some customer information relevant to their work;
- provide software services, like our meter reading system, social media management, case management and workflow systems etc. to support us with processing the large amounts of data that we need to manage. Occasionally these providers store or back-up information on servers outside the European Economic Area (EEA);
- process information and provide statistical analysis, management information and IT support. This requires them to process your personal information, and this may happen outside the EEA;
- help us process card payments, payment card transactions and to process cheques;
- print bills and customer communications; and
- provide additional support to our customer services teams in busy times. They have access to relevant customer information in our billing system and may use your data to contact you on our behalf.

## 15. Where we store your information and how we keep it safe

All customer personal information stored on our corporate systems is kept securely. We operate a suite of Information Security Policies to minimise the risk of security breaches, including appropriate access and auditing controls.

We use industry standard protection methods to minimise the risk of cyber-attack. Unfortunately, the transmission of information via the internet may not always be secure. Although we'll do our best to protect your personal information, we cannot guarantee the security of information you send to us that is outside of our security arrangements; any transmission is at your own risk.

We also operate strict physical security at all our sites and employees all receive security and data protection awareness training.

We may store your personal information on your local device, such as your computer or mobile phone to assist you in your repeated use of our services. We have no control over inappropriate access to this information. You can delete this information at any time using the facilities of your Internet browser or by removing our application from your mobile device.

Where we transfer information to third parties to enable them to process it on our behalf (see the information about affiliated partners above), we seek confirmation of their compliance with security industry standards, legal and regulatory requirements.

## 16. Storing or transferring your information outside the European Economic Area (“EEA”)

We may transfer or store your personal information outside the EEA. It may be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services and management information reporting. Where information is transferred to a country or international organisation outside of the UK / EEA, we'll comply with the relevant legal rules governing such transfers.

## 17. How long we'll keep your information for

We only keep your information for as long as we need it. We'll retain certain information (e.g. contact information and bank details) for as long as you have a relationship with us. Our data retention policy outlines these time frames but the length of time depends on the purpose of the processing.

Generally, we'll keep your account information for up to seven years from account closure (e.g. if you move out of the Yorkshire Water supply area), after which time your personal information will be either deleted or anonymised from closed and finalised accounts.

Retention periods may be extended in certain limited cases as prescribed or permitted by law – e.g. because of an accident or to bring or defend a legal claim.

## More information about the work:



**Visit [yorkshirewater.com](http://yorkshirewater.com)**



**Free callback service via our website**

No waiting around on hold, fill out a simple form and one of our advisors will call you back as soon as possible.

## Other ways to contact us:



**Chat with us live on our website**



**Tweet us @YWHelp**



**Contact us on Facebook**



**Write to us**

PO Box 52, Bradford, BD3 7YD