

# Smart meter data policy

**How we use meter data to  
engage with customers.**

April 2023



# 1. Introduction

This privacy notice tells you how we collect and use your personal data when you have a smart meter installed at your home or business premises. A Smart meter, is simply a meter which collects and sends data on the flow into your property using a wireless network, Smart is sometimes referred to as AMI (Advanced Metering Infrastructure, or enhanced metering.). It should be read in conjunction with Yorkshire Water's Customer Privacy Notice (see Yorkshire Water Customer Privacy Notice).

If you do not have a smart meter, you should refer to Yorkshire Water's Customer Privacy Notice for information on how your meter data is collected and used.

We will have written to you if your property was having a smart meter fitted, however, if you're unsure whether you have been upgraded to a smart meter, please phone our call centre on **0345 1 25 25 20**.

Personal data is any data which can identify you or be used to identify you. It can identify you either on its own or when joined to other data. Water consumption data and other data associated with your Smart meter is considered personal data.

## 2. Who are we?

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

**E-mail: [Dataprotectionofficer@yorkshirewater.co.uk](mailto:Dataprotectionofficer@yorkshirewater.co.uk)**

**Post: 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.

### **Business customers**

If you are a business, charity or public sector organisation in Yorkshire and have any questions or concerns please contact your retail service provider. If you don't have a retailer please visit [open-water.org.uk](http://open-water.org.uk) for a list of retailers operating in the Water Retail Market.

### **3. When do we collect data from your smart meter?**

When a smart meter is installed for your property, we will collect water consumption data and information about the meter's performance. The meter will log the flow data on an hourly basis during the day (4am until 2am the next day) and every 15 minutes during a small period in the night when leakage calculations take place (2am-4am). We have this data sent to us retrospectively between every 4-24 hours, meaning the data is not live. If you were one of the circa 2500 customers taking part in the Smart Meter leakage trial in Sheffield, we will have logged the data in 15 minute increments all day and have the data sent to us every 3 hours.

If you have not had a meter upgrade and have an ordinary, traditional meter, please refer to our Customer Privacy Notice for information on how we process your meter data.

### **4. What data do we collect from your smart meter and use?**

When we install a smart meter we ensure that we put all the right information about the meter into our databases to ensure the meter provides the right information for the correct property.

In addition the meter records flow in Litres per hour, with the minimum flow the meter can record being 1L/hour. The meter logs the amount of water passing through it over a given time period.

In summary the data we collect about the meter or from the meter is as follows:

- Meter Serial Number
- Meter Ancillary components serial Numbers (some meters come in 2 or 3 parts)
- The flow data for your property in L/hr with a time stamp for what time period the flow occurred
- The property the meter is recording flow for and the location of the meter (i.e in footpath outside property).
- The meter monitors a number of parameters and informs us if we need to maintain it or take action (e.g tamper, dismount, backflow, continuous flow)

This data from the smart meter is combined with other data, including personal data, that has already been collected and is currently being processed by Yorkshire Water for other purposes, e.g. customer name and contact details, property identification number, meter serial number, account information etc. For more information on how Yorkshire Water use personal data generally, please refer to our Customer Privacy Notice.

## **4.1 Special Category Personal Data**

Different rules apply to data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, data concerning sexual orientation or sex life, along with biometric and genetic data, which are all called special category personal data.

The data that we collect and use from your smart meter does not fall within the category of special category personal data.

For information about the special category personal data that we process, please refer to Yorkshire Water's Customer Privacy Notice.

## **4.2 Which customers does Smart Metering apply to?**

Yorkshire Water has currently only undertaken trials for leakage using Smart meters, however it's our ambition to make Smart metering standard over the next 15 years. Below is a summary of the policies in place regarding smart metering:

- For new developments we have a compulsory metering policy, these developments will have smart enabled meters as standard which will be turned to smart functionality in line with the regional roll out of Smart infrastructure, which allows us to collect the data on a daily basis.
- For existing metered customers, when your existing meter is ready to be replaced, we will exchange it for a Smart meter in line with the regional roll out of Smart infrastructure which allows us to collect the data on a daily basis.
- For Domestic Meter Optants we will install a Smart Meter if your property is in an area with, or due to have Smart capability soon. In line with our customer metering policies, you can within a two year period from install ask us to not be billed by a meter reading. The meter will remain in place and be used for improved service only, not for billing.
- For unmetered customers. Beyond the trial areas, we have no plans to meter your property for improved service. If this were to change, we would not charge you using the meter without your consent.



# 5. Why do we need to collect and use personal data from your smart meter and what is the legal basis for using it?

Yorkshire Water will make available the Smart Meter data to Yorkshire Water or framework suppliers to undertake the activities as listed below for the fulfilment of their role and service outcomes. Employees outside of delivering the services listed below will not have access to the corporate systems to view smart meter data.

Why?	Legal basis
<p><b>To detect potential leakage</b></p> <p>Using Smart meter data we can detect continuous flow into your property, which could indicate leakage. We can then work with our customers to help identify and resolve leakage, water waste and any potential charges for water being lost.</p>	Public Task
<p><b>For improved water network management</b></p> <p>Yorkshire Water has a challenging performance requirement to reduce the leakage of 2017 by 50% by 2050. We use district metered areas (DMA's) to understand how much water is being supplied to a discrete area (usually about 1000 properties). We calculate leakage and prioritise our proactive teams to find and fix leakage using flow data from our DMA meters at night, between 2 and 4 am, when most people don't use water. We use a series of assumptions to calculate how much of the water passing into the DMA is consumption and how much is leakage. By using Smart meters, we can categorically determine what flow into the DMA is consumption and what flow is leakage. This is achieved by adding up all our customers demand from their smart meters and subtracting the volume of water from the DMA meter demand. The difference between the two values gives the level of Leakage on our network and helps us to accurately direct our staff to the right areas. By making our leakage reduction activity more effective we're able to reduce our impact on the environment and give better water security into the future.</p>	Public Task

## Why?

## Legal basis

### **Improved regulatory reporting**

As only 66% of our customers are metered and the majority are on standard meters read every 6 months, we have to use a number of models and assumptions to calculate leakage on a daily basis before we can direct our staff to find leaks and bursts. By better understanding actual consumption within a DMA we can more accurately report what is consumption and what is leakage on a daily basis. We can also improve the assumptions within our calculations about how much water and when water is used in the night, again helping us to make the leakage calculations more accurate.

Legitimate interest

### **To support customers with account management processes**

By collecting flow data daily as opposed to every 6 months as standard, we are much more able to support customers in billing queries, property moves, void properties or if you report potential leakage at your property.

Legitimate interest

### **To offer you additional customer services- engaging with customers on their water use**

For any metered customer we can provide insight to your water use habits with a breakdown of when the water is used in the day if you are smart metered, or how your consumption changes on a monthly basis if you are metered with a standard meter. If the customer signs up to these types of services, we will be more proactive in helping customers understand their use and how it has it changes over time.

Legitimate interest

### **To Improve billing process**

Using the more frequent consumption data we collect from smart meters, we can ensure your bills are more accurate using actual up to date reads. It enables a better accuracy of billing for the range of billing types and cycles we offer. If you have not chosen to have a meter installed, you will not be billed using the meter readings. Additionally, in line with our customer meter policy if you have opted to have a new meter installed, you can choose to not be billed using the meter within a 2 year window post installation.

Legal obligation

## Why?

## Legal basis

### **For improved asset maintenance**

Where a meter has stopped working, fallen off or is in need of maintenance, we can ensure we quickly have sight of the issue and send someone to resolve the meter problem.

Public Task

### **Innovation**

As computing becomes more powerful we can use hydraulic models and digital twins to simulate our resilience to network events and ensure we respond in the best way, minimising impacts on customers. The inclusion of accurate property demand into these models in the future will help us improve resilience, mitigate impacts on customers and understand network performance in response to things like extreme weather or how water use and network performance changes in any future global pandemics.

Legitimate interest

## 6. Who do we share the data from your smart meter with?

We may share data from your smart meter with the following categories of third parties for the purposes listed below and/or in the following circumstances:

- with our third party suppliers and contractors (data processors) who carry out tasks and activities using smart meter data on our behalf\*, e.g. our Smart Meter Network Provider, our Water Services Partners and contractors (who need this information to carry out work for us such as fixing leaks on our network);
- with Business Process Outsourcers (e.g. a supplier providing bill printing services);
  - With organisations who bill on our behalf, such as Non-Household (NHH) retailers, Severn Trent Water; United Utilities and Northumbrian Water.
  - Organisations who we undertake meter reading contracts for such as New Appointee Variants (NAVs)
- with Debt Collection Agencies and solicitor firms instructed by us to recover customer debt;  
with Courts (including the County Court Bulk Centre) and High Court Enforcement Officers;
- with third parties making disclosure requests permitted by data protection legislation, e.g. police, local authorities, HMRC, our economic regulator (Ofwat) and the NHH retail market regulator (MOSL);
- with regulators who require us to share Smart meter data for regulatory investigations, such as the Drinking Water Inspectorate (DWI) and Environment Agency (EA) and with the Consumer Council for Water (CCW);
- with research organisations for research (on an anonymised, non-personal basis);
- with Housing Associations and Councils;
- with our IT partners who host, manage and develop IT solutions for us.

\* When we use third party organisations to help provide services to you, we have contracts in place with them which means that they can't do anything with your personal data unless we've instructed them to do it. They won't share your personal data with any other organisation unless they are instructed by us to do so. They will hold it securely and retain it for the period we instruct.



## 7. Where your smart meter data may be processed

Sometimes we will need to share your personal data with third-party data processors in countries that are outside the UK, these will be within the European Economic Area (EEA). When we do this, we put adequate safeguards in place to ensure your data receives the same protection as if it were being processed within the UK. If you wish for more information about how your data may be processed outside the UK, please contact our Data Protection Officer.

## 8. Automated Decision Making

Automated decision making uses analytics to help us make better and more timely decisions using your personal data without manual intervention. When using smart meter data, we use analytics to help understand:

- Whether a customer is likely to have a leak on their water supply or not
- Whether a property may be the cause of pressure waves in our network caused by very quick and large changes in demand. This is unlikely for any household property.

### **Examples of automated processing activities using smart meter data include:**

- to understand our customers and to tailor and personalise our processes and communications
- to provide daily, weekly and monthly water usage information, monthly comparison information (including a 'similar home comparison' and 'top 20% efficient comparison') to help you understand your water usage and save water.
- robotic process automation (RPA) to automate processes traditionally carried out by a human for enhanced data accuracy, quicker processing times and improved process governance
- analysis to understand the impacts of weather or social events on water consumption in the long and short terms, so that we can more accurately plan our water supply strategy for the future

## 9. How long will we keep your smart meter data?

Whenever we collect or process your smart meter data, we store the data alongside the property the meter is monitoring. As such your consumption information does not travel with you if you move house. This property water flow data is important as it helps us understand how our network performs in relation to the demands put upon it by our customers, such as when extreme weather occurs, during different social events in the year (like bank holidays and Christmas). In some cases a network event can be very rare, so storing the consumption data for a longer time periods is needed so we can refer back to it and maintain a corporate history of best action, forecasting, scenario planning and continuous improvement. Yorkshire Water will delete the Smart Meter data after 7 years in line with billing practices. Beyond 7 years, the data will be aggregated and/or anonymised, to allow for historic reference and analysis to be undertaken to improve service.

## 10. What are your rights over your smart meter data?

You have a number of rights in relation to the Smart meter data that we hold about you. Specifically, you can:

- ask for a copy of that information, free of charge in most cases
- ask for information about how we process your data
- ask us to change it if it's wrong
- in certain specific circumstances, ask us for the data to be removed from our records
- in some specific circumstances, you can ask us to stop processing your data
- in some circumstances, ask for your data to be given to you in a format that you can use to transfer to another organisation
- object to certain types of processing of your data, such as direct marketing which you can object to and stop at any time
- You can object to processing carried out on legitimate interests grounds, including profiling, and we will provide you with our reasons for that processing
- If you do not agree with those reasons, you can refer the matter to the Information Commissioner's Office

If we refuse a request under the above rights, we'll tell you why. You have the right to complain as outlined in section 2 above. All of the above requests may, where necessary, be forwarded on to any third party we use (see section 6 above) in the processing of your personal data. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make in the exercise of your data protection rights. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act. If we are unable to action your request, we'll explain our reasons to you.

### More information about the work:



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



**Free callback service via our website**

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

### Other ways to contact us:



**Write to us**

PO Box 52, Bradford, BD3 7YD



**Tweet us @YWhelp**



**Contact us on Facebook**

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