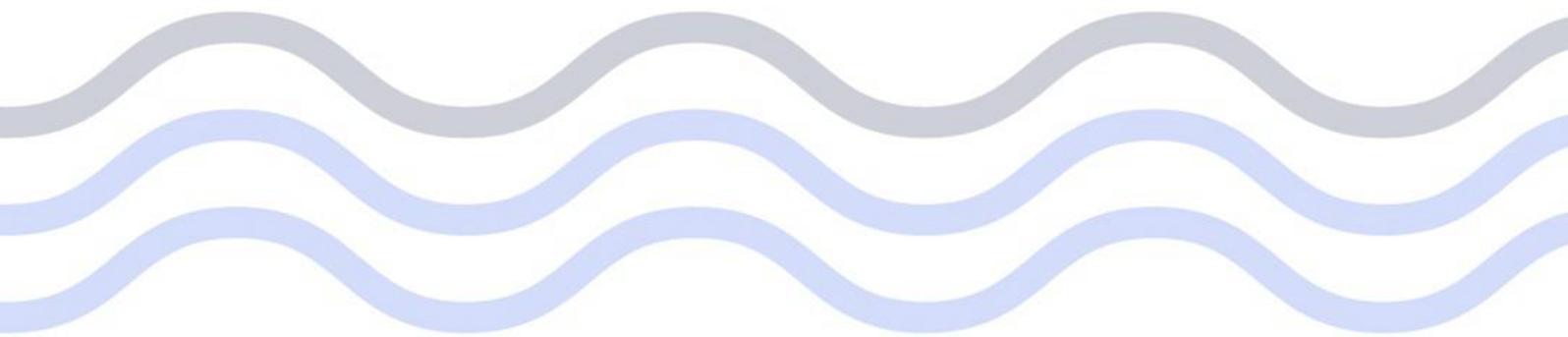


Yorkshire Water Privacy Notice



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

This notice is dated May 2025.

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**



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**



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

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

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 this may be from us directly or via a third party for example TrustPilot, complaints that have been made to CCWater, communications around your water usage, certain marketing activity such as WaterAid or other promotional material in your billing envelopes, data sharing with credit reference agencies, fraud prevention and detection, processing competition entries, 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 wastewater 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.

If we contact you via email, the email messages you receive may be trackable at an individual level. This allows us to determine how successful emails are, whether they have been opened, type of device used to open it and whether links have been clicked. This information is used to improve our email communications and may occasionally be used to send relevant further communications in response to your actions (e.g. clicking a particular link) or inactions (e.g. not opening an email).

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.

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 collect sensitive personal information from you under the legal basis of Public Task and Substantial Public Interest to allow access to the PSR but we will remind you of this at the point of telling us. Full details of this are in the below section. We will collect sensitive personal information from you under a consent basis to allow us to provide the right support scheme for you needs. This will be explained to you at the time.

Yorkshire Water use customer metering as a key tool in helping us to efficiently deliver and improve service across a number of legal obligations and regulated outcomes, including leakage, maintaining our pipes and other assets, water efficiency, supporting vulnerable customers and carbon emission.

- Water flow data from customer meters is collected by visual read, remote read and using Smart meters which utilise IOT networks. Our legal basis for processing personal data for the above activities is Article 6(1)(e), which allows us to process personal data to perform our “Public Tasks”.
- Our range of customer meters can record flows with an accuracy of 1L/hr, we use this flow data to understand how much demand/consumption our customers are using at regular time intervals.
- These intervals for measuring flow can be between every 15 minutes for Smart meters for parts of the day, to monthly for remotely read meters.
- The flow data from customers meters is uploaded for YW to utilise between every 3 hours and daily for Smart Meters, and every 6 months as standard for a Visual or Remotely Read meter.
- The flow data is collected and stored in accordance with YW information security policy.
- Yorkshire Water shares data with third parties to complete analytics to improve the service we provide to our customers, this data is shared in accordance with information security policies and the third parties can not use the flow data for purposes other than specified by Yorkshire Water.

- Yorkshire Water does not sell customer flow data to third parties.
- Flow data is stored against the property the meter supplies and historic data used to improve network management, hydraulic modelling, leakage management and billing.
- More detailed information on what we collect in different circumstances and how it will be used is set out in our smart meter data policy, please refer to this for further information

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

The Priority Services is a free service for customers who may need additional assistance either in communicating with us or in the event of a water supply/sewerage disruption. Priority Service customers include people with physical or mental impairments, medical conditions, the elderly, or those who have a young family. These customers may not be able to easily leave their home to collect bottled water, have a significant need for water or may not comprehend safety information around water quality. We may contact you by telephone, e-mail, text or a physical visit to your home if there is a situation in which we could offer a service to support your circumstances.

If you identify yourself as a Priority Services customer, we may register you as such on our customer systems. We will also identify and record you as a Priority Service Customer on your 85th Birthday. This will enable 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 process your information in line with UK GDPR and The Data Protection Act 2018. We store and hold your personal information securely on our computer systems. We process special category data as part of the PSR. Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information – Please see 'Your Privacy Rights' section.

Our lawful basis for processing this information regarding PSR information is:

Article 6(1)(e) of UK GDPR, for the performance of a task carried out in the public interest. and our processing of special category data, such as health information you give us, will be based on Article 9(2)(g), as being necessary for reasons of substantial public interest.

Our lawful basis for sharing your data with e.g. Energy Sector for the purpose of safeguarding vulnerable individuals is:

Article 6(1)(f) of UK GDPR, for legitimate interest purposes and the substantial public interest requirements for processing under Article 9(2)(g) of UK GDPR and Schedule 1, Part 2, paragraph 18 (safeguarding of children and individuals at risk) of the DPA 2018

We have an 'appropriate policy document' as required by the ICO which sets out our compliance measures and retention policies in relation to the processing of special category information. A physical copy can be provided on request.

You do not need to share full details of your condition to be added to the Priority Service Register however the minimal amount of information needed will be the type of circumstances you have (e.g. a chronic illness, home dialysis, etc). We record this need under a variety of descriptions which we will discuss with you and hold this description on your account for as long as it is required. This information is needed to ensure we can keep you safe and can provide the services you need. We may periodically contact you to confirm if the information we hold on the PSR is accurate and to ensure you still wish to remain on our PSR. We may also request a third party company, with whom we have a contract, visits your property to check your PSR service need.

On joining the PSR we hold the information for as long as the service is required. We may keep the information for a specified period of time if you request that of us. This may be in circumstances where you require PSR support for a limited time such as post hospital recovery, temporary illness, etc.

To support customers we may also share information with external organisations, such as energy providers, to ensure customers gain access to equivalent services provided in other sectors.

You can be added to or removed from the register if your circumstances change or if you would like to come off the register. You can do this at any time through any of our customer services channels where we will consider the impact of the request with you.

In order to understand where we need to improve the service we provide to you we use an external company to conduct market research. They use the information to contact you in a method most appropriate for your needs and to be able to ask you the relevant questions around how effective our services are for your needs. They do not retain any of your personal information following the survey being completed

We do not use or share your PSR information with any third parties for the purposes of direct marketing.

We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it or share with a sub-contractor without our permission. They will hold it securely and retain it for the period we instruct.

We may process your data outside of the EEA. Whilst we do not send your data outside the EEA we use companies in those non-EEA areas to support our IT functions. They may be able to access and view your information in specific circumstances in providing the service that is required to complete their contractual obligations. we will make sure that it is protected in the same way as if it was being used in the UK.

If you have queries or concerns about how we have processed your data in relation to the PSR, please contact us at dataprotectionofficer@yorkshirewater.co.uk and we'll

respond. If you remain dissatisfied you can make a complaint to the Information Commissioners Office, details are available on the 'Contacting Us' part of our Privacy Notice.

You can find out more about our Priority Services at 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 on this page.

We will contact you via email, the email messages you receive may be trackable at an individual level. This allows us to determine how successful emails are, whether they have been opened, type of device used to open it and whether links have been clicked. This information is used to improve our email communications and may occasionally be used to send relevant further communications in response to your actions (e.g. clicking a particular link) or inactions (e.g. not opening an email).

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 internally.

From the 2 February 2022, your tenancy with Yorkshire Water will be managed by a third party, with whom we have a contract.

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.

Yorkshire Water Developer Services customers

Developer Services is the Yorkshire Water business unit that provides new connections to our water and sewerage networks. Our customers include:

- Homeowners and single-property developers looking to develop/extend their home or convert a property;
- Large developers needing new water and sewerage infrastructure for a new development site;
- Self-lay providers (SLPs) – third-party providers that are accredited to install water infrastructure and connections on behalf of developers;
- New appointees and variants (NAVVs) – smaller water companies appointed by Ofwat to provide water and/or sewerage services in an area previously served by one incumbent water company.

If you are a Developer Services customer, we need to collect, process and store a variety of information about you and your property/site that may be personal or sensitive in nature.

This includes:

- Name and address – to verify your identity and help us to prevent fraud;
- Contact details (phone number and email address) – to contact you about your application, update you about the services you've requested or receive from us, or to inform you about service interruptions;
- Financial information (including method of payment and bank account details) – to receive payments, invoice you for services you receive and manage your payment arrangements;
- Information about your existing or proposed property/site (including site plans, grid references, photos and video files) – to help us process your application in line with your request.

Our legal bases for processing your information fall under the following categories:

- **Public task** – where the processing is necessary for the performance of our statutory public duties (i.e. providing new water supplies and sewerage services and maintaining our infrastructure);
- **Consent** – where you have given your consent for us to process your personal information;
- **Legitimate interest** – where the activities are for business purposes and do not impede your rights as a data subject (e.g. we may invite you to provide feedback on your experience with our services so that we can improve our service provision);
- **Contracts** – where the processing is necessary for the performance of a contract where you are a party to the contract;
- **Legal obligations** – where 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 our regulators).

This information is provided by you directly when you submit an application for one of our services. We may also ask you to confirm your details on subsequent contacts from time to time. We will only use your information for the specific purpose(s) for which it has been provided to us. All personal and sensitive information is stored on our corporate systems securely.

A third party carries out construction works (i.e. pipe laying, water service connections and water main installations) on our behalf, and is given access by us to some of the information provided in your application, such as your contact details and information about your property/site. They will only have access to information relevant to the works they have been contracted to carry out, and will hold it securely and retain it for the period we instruct.

We are required to share data with our water regulator Ofwat (and third parties working on their behalf) for the purposes of the water industry's Developer Services Measure of Experience ("D-MeX"). At Ofwat's request, all Developer Services 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. 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 may, from time to time, contact you to seek feedback on your experience with our services. We do not use, or share with any third parties, your information for the purposes of direct marketing.

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;
- contact information from GBG for business operations and providing services; 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. 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.

9. 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. We may need to share details about your complaint internally to fully investigate. If you escalate your complaint to CCW - the voice for water consumers, we'll share information with them or their adjudication provider, in order to resolve your concern. This exchange of personal data with CCW and their adjudication provider 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.

The use of artificial intelligence in Yorkshire Water

We may use your data for various forms of artificial intelligence (AI) to enhance our

services and operations, such as machine learning, expert systems, generative AI and large language models. We may apply AI to analyse data, improve customer experience, optimise network performance, detect leaks, prevent pollution, and other functions that improve our services or reduce costs. We will always ensure that our use of AI is ethical, transparent, fair and compliant with the relevant laws and regulations.

We do not use automated decision-making processes without human oversight and intervention. We respect your individual rights regarding your personal data and how we use AI.

We may use your data to automate processes that are usually done by a human, by using robotic process automation (RPA). The automated processes will follow only a set and agreed process, which will improve data accuracy, processing time and our process governance. RPA is typically suitable for high-volume repeatable processes that are logical, non-cognitive and usually part of a bigger processing activity. We use these processes to streamline processing activities and create efficiencies across our business.

10. 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

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.

When you accept our analytic cookie and are logged into your online account we will collect your customer reference number. We use this information together with offline data, to analyse how our services are used and to help us improve and enhance our website and customer experience.

11. Capturing images (including CCTV)

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

We use closed-circuit TV (CCTV) and, where necessary body-worn video:

- for the security of staff, contractors and visitors and the protection of our sites and land

- for the prevention and detection of crime at our premises and land
- colleague safety when lone working

The personal data we collect from you through the use of CCTV and Body Worn Cameras may include:

- still images
- video recording
- audio recording

Data collected through the use of activated body-worn video may include special category data is defined as:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation

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.

Body Worn Camera (BWC)

Our employees are sometimes subjected to or threatened with physical or verbal abuse or assault. Body-worn video equipment is used primarily to deter people from this type of behaviour and also to record any incidents that do occur. The recording will be used to review the incident and used as evidence if the incident is reported to the police or other enforcement agency.

BWC will only record if activated by a colleague who will verbally notify the individual that recording will commence, we have internal policies and have provided training to colleagues.

The legal basis for processing your personal data is legitimate interest.

For special category data the substantial public interest condition met in these circumstances falls under the Data Protection Act 2018 Schedule 1 Part 2 (11) Protecting the public.

Images are stored in line with our data retention policy and then destroyed, they will be retained for longer if connected to an investigation.

12. 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 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 Customer Measure of Experience ("C-MeX"). C-MeX is a performance reporting framework designed to regulate customer experience 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. Under the GDPR, data controllers who jointly control personal data must make available to data subjects a summary of the arrangements and allocation of responsibilities between them. Therefore, MOSL has provided a Summary of Arrangements on their website - You can find out more under the GDPR section here

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, Equifax and TransUnion as part of our credit reference agency membership (you can read more about how CRAs process your information at [TransUnion](#), [Experian](#) and [Equifax](#)).
- 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 or email 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.

Coronavirus

In order to best respond and help coordinate the community response for COVID-19 it may be necessary to share basic details about you to NHS track and trace where necessary.

Where any of our colleagues receive a positive Covid test, NHS track and trace will contact the individual and ask them to provide information on instances where they've had close and recent contact with others and places they've been. Due to the nature of our work, this also includes our customers. We will only provide the minimum information required which is a name and a contact number. We do not store this information in our systems.

Categories of recipients

As a large organisation to meet the legal requirements set out in Data Protection Legislation we adopt a categorisation approach for our data processors. Please find below the categories of recipients:

Kelda Group companies and their employees	Affiliated partners, contractors and sub-contractors. (including their employees and subcontractors have access to some customer information relevant to their work)	Regulators, their agents or third parties working on their behalf	Regulators : non-household customers	Law enforcement, fraud prevention bodies and other public authorities
Credit reference agencies (CRAs)	Third party debt collection agencies (DCA) / debt management companies	External market research companies, survey companies and analytical providers	Software, IT and operational service providers	Smart metering
Legal advisors, insurance companies or other professional services	Other water companies	Local authorities, advice agencies, charitable organisations	Process card payments, payment card transactions and refunds	Print bill and customer communications
Certain marketing activities or other promotional activities	Energy sector organisations	Other third parties (e.g. in case on sale or corporate restructuring)	Yorkshire Water as landlord	

13. 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:

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Data classification :Public

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- 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 refunds;
- 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.

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.

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.

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.

Yorkshire Water online bill/statement guide

In order to access the Yorkshire Water online bill/statement guide you will need to provide us with your customer reference number and your postcode.

By logging in, and continuing to login to the online bill/statement guide you are authorising us to process your data in order to provide you with a personal explanation in accordance with Yorkshire Water's privacy policy.

Yorkshire Water cannot guarantee uninterrupted and/or reliable access to the online bill/statement guide and makes no guarantees whatsoever as to its operation, availability, functionality, that it will be free of error or disruption or otherwise.

Yorkshire Water reserves the right to refuse the use of the online bill/statement guide to anyone for any reason whatsoever in its absolute discretion. Further, we reserve the right to modify or discontinue (permanently or temporarily) offering the bill/statement guide to you or all recipients at our discretion and at any time.