



# Portsmouth Water **Privacy Policy**

**Delivering excellence**

for our customers, our people and our environment



## **PORTSMOUTH WATER LIMITED IS COMMITTED TO PROTECTING YOUR PRIVACY AND COMPLYING WITH THE DATA PROTECTION ACT 1998**

This notice applies to personal information we hold about household customers. It explains how we may collect information about you and then use it. We also tell you what your rights are, and how you can get in touch with us.

### **WHO WE ARE**

Portsmouth Water Limited is the principal subsidiary (Company Number 2536455). This privacy notice sets out when we may share your information with our affiliated partners, sub-contractors and selected third parties.

### **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect personal information about you (name, date of birth, telephone number, postal/email address, how you want to pay your bill etc.) in a number of ways, for example:

- when you set up your account;
- when you contact us for any reason;
- if you complete an online form, enter a competition or complete a survey;
- from third parties (electoral roll, credit agencies, Southern Water, Albion Water);
- if you attend any of our events, e.g. water festival

Sensitive information may also be collected when you sign up for special tariffs for vulnerable households or our Service Plus Scheme.



## WHAT WE DO WITH YOUR PERSONAL INFORMATION

We may use your personal information to:

- provide you with the services you want;
- administer your account (including dealing with any problems, enquiries and complaints, and in relation to any unpaid bills);
- prevent fraud;
- keep our records accurate and up-to-date;
- undertake customer profiling;
- create statistical information and carry out market analysis (on a non-personal basis);
- comply with any legal obligation we may have; and
- for the purposes for which the information is provided.

We will not disclose your personal information unless we are permitted to do so by law. Instances where we may share your personal information include:

- with our employees, contractors, Southern Water, Albion Water, including specialist data processors, in order to help provide services to you;
- with fraud detection and prevention, or as part of our debt collection process using third party debt collection agencies.
- with external agencies such as Local Authorities, Police, Fire and Ambulance Services in the event of an emergency situation, such as under the Civil Contingencies Act 2004 (this may include sensitive personal data such as any medical conditions you may have if you have signed up to the Service Plus Scheme);
- Market Operator Services Limited or MOSL, the company who is established to facilitate the Open Water Programme which has been designed to ensure that non-household customers are provided with a choice of supplier and access to tailored packages that are better suited to them.

You may find out more about Open Water here: <http://www.open-water.org.uk/>. You may find out more about how MOSL processes your information here: <https://www.mosl.co.uk/privacy-notices/>.

- when we are under a legal duty to do so, because of a Court order or statutory obligation;
- to the police for crime detection;
- for research;
- for market research.



## **CUSTOMER SURVEYS**

From time to time we may use your email to send customer surveys relating to the service we provide to gain vital feedback and to improve our service.

Each time you are contacted you are given the opportunity not to receive any more surveys. You may ask us at any time to stop sending these surveys by calling 023 9249 9666 or by writing to us at the address shown in the “Contact Us” section of the privacy policy or by email to [head.office@portsmouthwater.co.uk](mailto:head.office@portsmouthwater.co.uk). Please note, the emailed surveys are not for marketing purposes or for us to use as a tool to sell items to our customers.

## **SUPPLY AND USE OF DATA BY CREDIT REFERENCE AND FRAUD PREVENTION AGENCIES WHAT WE DO**

When you become liable for services, we will do all or some of the following:

Check our own records for information on:

- any previous accounts you may have had with us;
- and, if they have one, any previous accounts anyone jointly liable for payments have had with us;
- if you are an owner, director or partner in a small business we may also check on your business.

## **WHAT WE DO WITH THE INFORMATION YOU SUPPLY TO US WHEN YOU FIRST BECOME LIABLE FOR CHARGES FOR OUR SERVICES:**

- a) If you inform us that you have a spouse or partner who is jointly liable for payment, we will:
  - i) take both your and their information into consideration when managing the account in future;
  - ii) continue this linking until the account closes, or is changed to a sole account and one of you notifies us that you are no longer linked. So you must be sure that you have their agreement to disclose information about them.
- b) If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.



## **HOW WE USE THE INFORMATION WE RECEIVE FROM FRAUD AGENCIES AND CREDIT AGENCIES**

- a) Assess your account and decide what payment terms would best suit your circumstances.
- b) Verify your identity and the identity of anybody named as being jointly liable on the account or other directors/partners.
- c) Undertake checks for the prevention and detection of crime, fraud and/or money laundering.
- d) Use scoring methods to assess how to manage our future relationship.
- e) We may make periodic searches of our own records and at a Credit Reference Agency to manage your account with us, including whether to review your existing payment terms or recover monies due to us.
- f) We may also check at a Fraud Prevention Agency to prevent or detect fraud.
- g) If you have used our services, vacate premises and do not make payments that you owe us, we will trace your whereabouts and recover debts using third party debt collection agencies.

## **HOW YOUR DATA WILL NOT BE USED BY A DEBT COLLECTION AGENCY & CREDIT REFERENCE AGENCY:**

- a) It will not be used to create a blacklist.
- b) It will not be used to create marketing lists.



## **HOW YOUR DATA MAY BE USED BY FRAUD PREVENTION AGENCIES:**

- a) The information which we and others provide to the fraud prevention agencies about you, those who are jointly liable for our services with you and your business (if you have one) may be supplied by fraud prevention agencies to other organisations and used by them and us to:
  - i) prevent crime, fraud and money laundering by, for example;
  - ii) checking details provided on applications for credit and credit related or other facilities;
  - iii) managing credit and credit related accounts or facilities;
  - iv) cross checking details provided on proposals and claims for all types of insurance;
  - v) checking details on applications for jobs or when checked as part of employment.
- b) Verify their identity, if an individual applies for other facilities including all types of insurance proposals and claims.
- c) Trace whereabouts of individuals and recover debts that are owed.
- d) Conduct other checks to prevent or detect fraud.
- e) We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.
- f) Undertake statistical analysis and system testing.

## **OTHER USES OF YOUR DATA**

Except as provided for in this privacy policy, we will not disclose your personal information to third parties for any other purpose, unless we have your express consent.

## **DATA ACCURACY AND RETENTION**

Please let us know if we need to make any changes to your personal data to ensure it is accurate and up to date. We will only retain your information for as long as it is needed.

## **CHANGES**

From time to time, we may amend this privacy notice, to reflect changes in the law, our experience of operating the website, or for other reasons. We will do this by posting the amended privacy notice on this website, so please check the website from time to time to ensure you are aware of the latest version.

## **MONITORING**

If you contact us by telephone, your call may be recorded for training and service-related purposes. This includes maintaining high quality standards, crime detection and/or prevention and to ensure that our employees comply with legal obligations and our policies and practices. We also monitor email communications and may restrict delivery under certain circumstances



## OUR WEBSITE

Our website contains links to other websites. Please note that when you follow one of these links that these websites have their own privacy policies and that we do not accept any responsibility or liability for their content or any personal data provided to them.

Our site uses “cookies” (“remember me”) options. Cookies identify the computer used, not the individual user and record the areas of the site visited and for how long. Your browser has options to accept, reject or provide you with notice when a “cookie” is sent.

## SECURITY MEASURES

The company follows good industry practices to safeguard your personal information to protect it from access by unauthorised persons and against unlawful processing, destruction and damage.

## YOUR RIGHTS

You are entitled to request from us, a copy of any personal information we hold about you. Provision of such information may be subject to the payment of a fee (currently fixed at £10.00). You can exercise your right at any time to ask us to prevent processing your information for marketing purposes by contacting us as detailed below.

## YOUR RESPONSIBILITIES

When you are no longer liable for our charges for example due to moving house, or there is a change to the individuals who are jointly liable with you, it is your responsibility to keep us informed of this. Failure to do so could result in incorrect data being shared.

## CONTACT US

Portsmouth Water welcomes your questions and comments regarding our policy on processing personal information. If you have any queries, please write to:

**Portsmouth Water Limited**  
**PO Box 99**  
**West Street**  
**Havant**  
**Hampshire**  
**PO9 1LG**

Email us at **[head.office@portsmouthwater.co.uk](mailto:head.office@portsmouthwater.co.uk)**

Alternatively you can contact our call centre by telephone on **023 9249 9666**

**[www.portsmouthwater.co.uk](http://www.portsmouthwater.co.uk)**

