



Portsmouth Water **Privacy Policy**

Delivering excellence

for our customers, our people and our environment



ABOUT PORTSMOUTH WATER LIMITED

This Privacy Notice is designed to explain how we collect and use our customer's and other individual's personal data. We are committed to protecting this data, to uphold their data rights, and to meet expectations for handling personal data.

We are a registered data controller, registration number: Z6707640. This means it is our responsibility to maintain and protect all personal data that we collect and ensure that anyone we share personal data with will also adequately protect that data.

This Policy relates to Portsmouth Water Limited (Company Number 2536455) as the principal subsidiary in the South Downs Group, but will also apply to other subsidiaries.



WHAT PERSONAL DATA WE COLLECT

We will always endeavour to make clear why we are collecting your personal data at the time.

Information you give to us

We could collect your personal data in a number of ways, including, whenever you fill in a form, contact us (including by social media), pay us, request a service, provide feedback, or enter a competition or survey.

Information you provide us may include:

- Personal details – name, date of birth;
- Account and card details – account number and sort code, account holders name, direct debit details;
- Contact details – postal address, email address, mobile or landline numbers;
- Details allowing you to apply for discount tariffs such as WaterSure, Social Tariff and Arrears Assist.

Priority customers are likely to provide information to us about medical conditions to allow us to make suitable arrangements, such as during supply interruptions; they will always be asked to give consent for us to process this data.

Information we collect

We record all phone calls, incoming and out-going, made by departments that deal directly with customers, including Customer Services, Distribution, Water Quality and Wholesale Services. While providing services we may collect data about you and when reading your water meter we will collect water usage information.

Whenever you visit our website we use cookies, although no personal information is collected. For more information, please see the 'Visiting our website' section of this policy.



WHAT TO EXPECT WHEN YOU CONTACT US

Contacting us via social media

It is never a good idea to post your personal contact information on a public social media site. If you contact us using social media to report an issue and we need more information, we will ask you to private message us with suitable communication information which we will use to contact you in order to resolve your concern or gather additional information for our investigation.

Contacting us by telephone

When you contact us by telephone, your telephone number may be added to your account so that contact with you in relation to your water account can be made more convenient.

In future, we may also use a telephone number listed on your account to text you in the event that there is a water supply interruption, water quality concern or to provide you with urgent information about your water account (you will be given the option to opt out of these text messages).

Emailing us

If you email us, we will respond to you using the email address you gave us. Please try to avoid sending personal data by email as this is not considered to be a secure communication method. Your email address will be added to your account and may be used for future communications.

Any email sent to Portsmouth Water, including any attachments, will be monitored and assessed by our security partners for reasons of security and to check compliance. Emails are also backed up by our data processor Mimecast. Emails are deleted in line with our retention rules.

Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

HOW LONG WILL WE RETAIN DATA FOR?

We have a data retention policy and data will be retained as long as it serves a useful and legitimate purpose and taking into account all legal and regulatory obligations.



PURPOSE FOR COLLECTING YOUR PERSONAL DATA

We will only collect data where we have a clear and legal basis to do so. The table below explains each legal basis we use, with a more detailed description of the purpose alongside it:

Legal Basis	Purpose
Legal Obligation <i>(Legally we need to collect this information).</i>	To meet our statutory obligations under: <ul style="list-style-type: none">• Water Industry Act 1991;• Water Resources Act 1991;• Environment Act 1995;• Water Industry Act 1999;• Water Act 2014;• Water Supply (Water Fittings) Regulations 1999;• Water Supply (Water Quality) Regulations 2016;• Instrument of Appointment as issued by the Secretary of State for the Environment.• The Water Supply and Sewerage Services (Customer Service Standards) Regulations 2008
Legitimate Interests <i>(As a Water Company we have a legitimate reason for collecting this data and consent is not required).</i>	<p>To provide water supply services and products.</p> <p>To administer a customer's account, including:</p> <ul style="list-style-type: none">• billing;• requests;• enquiries; and• complaints. <p>To contact customers about service relation issues, including:</p> <ul style="list-style-type: none">• interruptions to supply;• planned maintenance;• road works; and• water quality. <p>To make goodwill, compensation and loan payments.</p> <p>To communicate with you about products and services we provide, including:</p> <ul style="list-style-type: none">• optional metering initiatives;• water efficiency measures;• catchment management initiatives. <p>To carry out and analyse customer surveys.</p> <p>To carry our staff training and quality assurance.</p> <p>To use aggregated data to understand customer trends in lifestyle and water consumption to assist in business planning.</p> <p>To comply with any regulatory obligations we may have.</p> <p>To ensure we operate to the expectations of a reasonable water company.</p> <p>To handle responses to public consultations, such as our Water Resources Management Plan or Drought Plan.</p> <p>To maintain our land holdings and sites.</p> <p>To keep our records accurate and up-to-date.</p> <p>To ensure efficient collection of water charges.</p> <p>To prevent and detect crime, including fraud.</p>
Consent <i>(To hold this data we require your consent).</i>	Assess and provide operational and service requirements based on health circumstances.



WHO WE SHARE PERSONAL DATA WITH

We share personal data with multiple parties for legal, regulatory, and operational purposes. Other than where exchange of data is required by law, we have contracts in place with third parties with whom we share data. These contracts detail how personal data should be handled and protected while being processed by any third party. We conduct due diligence checks on third party processors to ensure they comply with their obligations to us.

We will not sell your data to be used for marketing purposes.

The types of Organisations we share data with are as follows:-

Category	Process
Debt recovery and credit reference agencies	Collecting unpaid debt.
Property maintenance contractors	Performing property maintenance.
Network maintenance contractors	Performing network maintenance, including street works, and responding to water supply incidents. Installing new water meters and providing services to 'Vulnerable' customers.
With Your Sewerage Provider (normally Southern Water Services Limited)	Meter readings and water consumption information for billing purposes to calculate waste water use; Occupancy/Occupier details to maintain accurate data; Details of any 'vulnerable' customers to provide priority services; Information for discount tariffs such as Watersure and Social Tariff so that similar discounts can be considered.
Financial (Banking and BACS)	Collection and payment of invoices and bills.
Housing Associations and Landlords	Water Regulation inspections.
Land Agents	Managing our land and property and obtaining land rights.
Social Media platforms	Responding to enquiries, concerns and complaints.
Customer survey and feedback services	Carrying out and analysing surveys and feedback results.
Insurance providers	Managing litigation and compensation claims.
External Legal and Professional Advisors	Obtaining legal advice, managing disputes and dealing with compensation claims.
Auditors	Providing assurance for business processes and decisions.



To comply with our legal and regulatory obligations we may provide personal data to the following authorities:

- Defra
- Ofwat
- Drinking Water Inspectorate
- Environment Agency
- Public Health England
- Environmental Health Authorities
- Institute of Customer Service
- CCWater
- WATRS
- MOSL
- Local Authorities
- Police, Fire, Ambulance, and other emergency services

All customers who contact us may have their contact details passed to a third party working on behalf of Ofwat as part of their assessment of the customer service that we provide. These surveys are one of the tools Ofwat uses to regulate water companies, and Portsmouth Water is obliged to share this information as part of our Instrument of Appointment. This is not a marketing call and as it is a Water Supply Licence Obligation, we have to share your data and are not permitted to remove any contact details. Portsmouth Water also conducts its own surveys in order to improve service and efficiency.

TRANSFERRING INFORMATION ABOUT YOU OVERSEAS

Some of our key system providers use product support (maintenance & consultancy) to assist with the ongoing implementation of their services. These product and support locations may be outside of the European Economic Area (EEA).

Where information is transferred to a country or international organisation outside of the UK/EEA we ensure our key system providers comply with the relevant legal rules governing such transfers.



VISITING OUR WEBSITE & COOKIE POLICY

With regard to each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you have 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.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Our website may also, from time to time, contain links to and from the websites of our partners and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you do not wish to accept our cookies you can still continue to use our website but it means we won't be able to use your visit to help us improve your experience.

It also means the cookie policy will continue to be visible as it takes a cookie to remember that you don't want to accept cookies.

Most web browsers allow some control of cookies through browser settings. More information about cookies, including how to block and/or delete them, via a range of common browsers, can be found at www.allaboutcookies.org.



DATA SUBJECT RIGHTS

We recognise customer rights under data protection legislation:

- **Right to be Informed**

Customers are entitled to know how their data is processed. This notice is designed to provide an overview of all processing activity. If more specific detail is required please contact us using the details provided at the start of this policy.

- **Right to Access**

Customers can access their data via a Subject Access Request, for more information please see our Subject Access Request Policy on our website.

- **Right to Rectification**

If customer data is found to be inaccurate we are under an obligation to correct it. This may be done by contacting the details provided below.

- **Right to Erasure**

Customers have the right to be forgotten. Personal data shall be deleted where there is no longer a legitimate purpose to the data processing.

- **Right to Restriction on Processing**

We have processes in place to restrict processing where there is a legitimate objection.

- **Right to Data Portability**

We do not currently carry out any such processing. If we do in the future, you can make a request and this data can be exported from our systems.

- **Right to Object**

If a customer objects to the processing of their data under legitimate interests they have the right to raise an objection, which will be appropriately considered by us.

- **Right to not be subject to automated decision making**

Customers have the right to have automated decision making to be reviewed by our personnel. We do not use automated decision making at the moment and will inform customers if our policy changes here.



CONTACTING US

If you would like to request further information about our privacy policy, or exercise any of your rights, you can email us at dataprotection@portsmouthwater.co.uk or write us at

Compliance Officer
Portsmouth Water
PO Box 8
West Street
Havant
PO9 1LG

You can also contact the Information Commissioner's Office at <http://ico.org.uk/> or write to Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF or 0303 123 1113 for information, advice or to make a complaint.

Portsmouth Water tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

Updating this Policy

We may change this notice from time to time. We encourage all customers to periodically check this policy on our website to ensure they are aware of the more recent version.

This Policy was last updated on 28 November 2018.

