

Privacy Notice

How we use your
Personal Data

We know how important it is to you that we look after your Personal Data. To be trusted to do the right thing is one of our core values. This Privacy Notice explains how we collect, use, share and protect your Personal Data in a way which respects your Data Protection rights and complies with UK Data Protection laws (including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018).

1. About us

Welsh Water is a not for profit water and sewerage company supplying over three million people with a continuous high quality supply of drinking water and taking away, treating and properly disposing of wastewater in our supply area which covers most of Wales and parts of Deeside and Herefordshire. Welsh Water is a trading name for Dŵr Cymru Cyfyngedig. For the purposes of Data Protection laws, Dŵr Cymru Cyfyngedig is the Data Controller (registered office Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT and company number 02366777).

2. How to contact us

If you want more information about our Privacy Notice, or have any comments or observations about it or about the way that we handle your Personal Data please:

Email our Data Protection Officer at: DataSubjectRightsRequests@dwrcymru.com; or

Write to our Data Protection Officer at: Data Protection Officer, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT.

If you would like to exercise any of your Data Subject rights (see below for more information) please:

Email us at: DataSubjectRightsRequests@dwrcymru.com; or

Write to us at: Customer Services, Data Subject Rights Request Team, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff CF3 0LT.

You can also contact the Information Commissioner's Office via <https://ico.org.uk/> or 0303 123 1113 for information, advice or to make a complaint.

3. Our lawful basis for processing your Personal Data

We only process your Personal Data if we: have a lawful basis to do so; the processing is necessary, reasonable and proportionate; and in accordance with the way in which we describe in this Privacy Notice.

Legal Obligation and Statutory Entitlements

Most of the processing we carry out at Welsh Water in relation to your Personal Data is necessary for the performance of one of our legal obligations or statutory entitlements as a statutory water and sewerage undertaker (eg. supplying clean water to you; removing waste water; managing our network; encouraging water efficiency; raising and collecting our charges; reducing debt; and our duty to protect the health, safety and wellbeing of our employees).

Substantial Public Interest

We will rely on a "Substantial Public Interest" to justify using your Personal Data to protect you from harm or safeguard your interests (where we think that we need to, or where you tell us that you need assistance) by registering you on our Priority Services Register (PSR) so that we can provide you with the support that you need and so that we can ensure that you receive priority assistance in the event of an interruption to your supply or other operational emergency.

The PSR is a register which contains the details of individuals who have particular requirements (eg. due to age, health, medical condition or extra communication requirements) where those requirements mean that we might need to contact the individuals in a particular way or as a matter of priority in the event of an interruption to supply or other operational emergency. Keeping information on the PSR means that we can respond quickly and adapt our services. For example, we might need to send a team to the address if someone can't communicate by phone, or we might need to deliver bottled water if someone has a particular medical condition.

Including your Personal Data on our PSR also means that we could share your Personal Data with organisations in your area whose role also involves keeping you safe or safeguarding your interests, such as other utility providers, emergency services, local authorities and health services so that they can also help you during an emergency.

For more information on our PSR please click here <https://www.dwrcymru.com/en/my-household/priority-services> – If we add you to the PSR because another organisation has let us know about your additional needs, we will let you know.

If you don't want to receive Priority Services by being on the PSR, you can let us know by using one of the following methods:

Email us at: DataSubjectRightsRequests@dwrcymru.com;

Write to us at: Customer Services, Data Subject Rights Request Team, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff CF3 0LT; or

Click here for our Data Subject Rights Request form: <https://corporate.dwrcymru.com/en/legal-privacy/data-protectionor> you can make a request by calling us.

Legitimate Interests

Where our processing is not necessary for compliance with a legal obligation or a Substantial Public Interest (as described above), we generally rely on our legitimate interests to run our business efficiently and improve our services (eg. assisting our billing and collection activities; to enable us to deliver affordable bills to our customers; carrying out customer satisfaction surveys or market research; letting you know about campaigns such as "Stop the block" and ways in which you can increase water efficiency).

We always check that our legitimate interests are not overridden by your rights, and process your Personal Data in a way that we think you would reasonably expect (ie. as set out in this Privacy Notice).

Consent

In limited circumstances we require consent from you to process your Personal Data – for example where you provide us with Sensitive Personal Data such as medical or health information in discussions with us about our Social Tariffs (eg. information relating to disability/sickness benefits). When we collect your Sensitive Personal Data for these purposes we will ensure that we get your explicit consent to collect and record it (and share with others if applicable), and tell you how you can withdraw your consent if you change your mind (see paragraph 10 for further information on your right to withdraw your consent).

For more information on our Social Tariffs please [click here](#).

4. What Personal Data we collect about you and what we use it for

We collect different types of Personal Data from you depending on how you choose to contact us and our relationship with you.

We may collect Personal Data from you in the following ways:

- Either when setting up (or amending) your account with us;
- When you contact us to report a leak, blockage or a water quality or other issue with your supply or to pay a bill;
- When you contact us by letter, telephone, email or livechat;
- If you contact us on social media. For more information about our use of social media, please see our Social Media Privacy Notice which is available here;
- When you apply for a social tariff or to go on our Priority Services Register;
- If you contact our Developer Services Team in relation to building a new development, replacing an existing water supply, requisitioning a water main or applying to self-lay water mains and services;
- If you come to our offices, visitor centres or education centres as a visitor. Please note, we have CCTV at our offices, visitor centres and education centres and so you may be recorded if you visit us.

There are signs to show you when you are entering an area monitored by CCTV. CCTV images are held for 30 days and then deleted (unless there is a legitimate business reason for us to keep it any longer). If you would like more information about our use of CCTV please contact Welsh Water's Data Protection Officer;

- If you make a complaint to us;
- If you visit and access our website. For more information about this please see our legal notice;
- We sometimes use drones in order to monitor, maintain and/or enhance our land, assets and our processes. The drones will be flown by CAA qualified pilots either employed by Welsh Water or third party contractors. We aim to avoid flying drones directly overhead or within 50 metres of persons, vehicles, vessels or properties.

The Personal Data we may collect from you includes:

- Name, address, email address, landline number and mobile number;
- Date of birth to help us identify you. Date of birth is one of the most unique identifiers of an individual, and by requiring you to provide your date of birth, this enables us to use it to verify your identity. This helps us make sure that only our customers are able to access their accounts and assists us in protecting your personal information;
- National insurance number if we need this information to pass on to the Department of Work and Pensions;
- Bank account details if you pay by direct debit;
- Debit and/or credit card information if you want to pay your bill by card;
- Income, expenditure and other affordability information (including benefits information) if you apply for one of our social tariffs;
- Medical or health information so that we can adjust our services to your needs (eg. if you ask to go on our Priority Services Register);
- Landlord name and address and contact details;
- Co-occupant and/or family member details (including children);
- Nominee details if you have nominated a third party to speak to us about your account;
- Meter serial number and usage information;
- Service history (eg. sewer flooding, low pressure);
- Other information relevant to our debt recovery processes (eg. your payment history).

We use the Personal Data we collect from you for the following purposes:

- **Contact you about your water supply and/or our services** – to let you know if there is an operational issue in your area, interruption to your supply or water quality issue; to update you on capital investment schemes or other works in your area; to let you know about water efficiency or stop the block campaigns.
- We rely on our statutory entitlements as a water and sewerage undertaker and our legitimate interests to do so.
- We may also occasionally rely on a Substantial Public Interest to do so if you are on our PSR (as set out below in more detail).
- **Account administration** – to administer your account, collect payments, recover outstanding amounts due to us and to inform our debt recovery processes.

This may involve consulting your records held at credit reference agencies (see below for further information) in relation to new accounts, settled accounts and any debts not fully repaid on time.

- We rely on our statutory entitlements as a water and sewerage undertaker and our legitimate interests to do so.
- **Your tariff** – so that we can apply a tariff that is appropriate to your circumstances. We will review your tariff regularly – usually on an annual basis – using billing information from your account with us. If you are eligible to move to a reduced tariff scheme (such as HelpU or WaterSure Wales) we may place your account on a reduced tariff, and let you know that this has been done. Find out more about the qualifying criteria for our reduced tariff schemes, and what happens when your household circumstances change, at dwrcymru.com – If you don't want to be considered for a reduced tariff scheme please contact us on 0800 052 0145.
- We rely on our statutory entitlements as a water and sewerage undertaker and our legitimate interests to do so.
- **Administering our Customer Assistance Fund** – to administer any application you may make under our Customer Assistance Fund (you will find out more about what this involves when you apply); and to collect payments directly from any applicable welfare benefits where applicable.
- We rely on our statutory entitlements as a water and sewerage undertaker to do so.
- **PSR** – if you have a particular requirement (e.g. due to age, health, medical condition or extra communication requirements) which means that we need to contact you in a particular way or as a matter of priority in the event of an interruption to supply or other operational emergency.
- We rely on a Substantial Public Interest to do so.
- **Improving our services** – in constantly trying to improve the way we work:
 - For training or system testing purposes.
 - To produce statistics, analytics and analysis to improve our services and offerings, for internal management and reporting and regulatory purposes.
 - To look at your relationship with us and contact you to invite you to participate in our customer surveys (which may be carried out on our behalf by third parties).
- We rely on our statutory entitlements as a water and sewerage undertaker and our legitimate interests to do so.
- **Regulatory requirements** – to comply with obligations, industry standards, codes of practice and guidance in connection with our regulated status and with our general legal requirements. This will include if (for example) you have an accident on our premises and we are required to report it in accordance with health and safety laws.

- We rely on our statutory and/or regulatory requirements as a water and sewerage undertaker to do so.
- **Water efficiency products and services**
- It is our responsibility and legal duty to promote water efficiency. We may promote products and services in relation to water efficiency. We may engage with a third party to provide this service on our behalf.
- We also on occasion promote Water Aid, a charity that was set up by the Water Industry to promote clean drinking water for all, or other relevant charities.
- We rely on our legitimate interests to undertake these activities. However if you wish to exercise your right to object to such contact from us please let us know.

5. Personal Data we collect from others about you and what we use it for

We may collect Personal Data about you from others as follows:

- Registered Social Landlords – so that we can provide you with our services;
- Government departments – to assist with applications from you for social tariffs;
- Local authorities – so that we can provide you with our services;
- If you are a tenant, we may also collect your data from your landlord or via Landlord Tap Limited, where they have notified you that they are passing it on, for the purposes of all billing requirements including debt collection, tracing and enforcement (where appropriate);
- Other utilities or organisations in your area such as hospitals, the fire service, as part of our PSR services;
- If you are a landlord, we may ask you for your data or collect it from Landlord Tap Limited for these purposes;
- Credit reference agencies, debt recovery and tracing agents – to check your identity, verify the accuracy of the information you have provided to us, manage your account, improve our debt collection processes, to inform the decisions we make in relation to our billing and collection activities, help us trace debt, collect money owed to us and prevent criminal activity, fraud and money laundering. Please see the "Credit Reference Agencies" section below for more information. You can also find more detail on CRAs and the way they use and share Personal Information in the Credit Reference Agency Information Notice ("CRAIN") (available at this link <https://experian.co.uk/crain/>)

6. Information we share with others about you and why

We may share your details with third parties as follows:

- With any companies in the Dŵr Cymru group to use in the same ways as us, and to get an overall picture of your relationship with the group. We rely on our legitimate interests to do so;

- With Landlord Tap Limited, if you are a tenant (and your landlord has notified you) or a landlord, for the purposes of all billing requirements including debt collection, tracing and enforcement (where appropriate). We rely on our legitimate interests to do so;
- Where appropriate, with law enforcement agencies including the police and local authorities, to help prevent, detect and prosecute crime, or where we consider it appropriate to do so to protect our business, employees and customers. We do so in accordance with our legal obligations;
- Government departments – where we believe that social benefits may apply we may apply to the Department for Work and Pensions to have our charges paid directly from your benefits. We will pass your name, date of birth and billing information to determine eligibility and to administer direct payments to us. They will notify you if direct payment is to be made or of any eligibility changes. We rely on our legitimate interests to do so;
- Local authorities – to help manage your accounts/billing arrangements. We do so either in relation to our legal obligations or rely on our legitimate interests to do so;
- Regulators and other agencies where appropriate for the exercise of their or our functions, or where we are legally required to do so. We also have an obligation to share your Personal Information relating to a water quality incident with the Drinking Water Inspectorate. We do so in accordance with our legal obligations;
- Other water and sewerage companies who bill on our behalf or we bill on their behalf;
- Other water and sewerage companies (including New Appointments and Variations) who provide a service to your property, for the purposes of ensuring they have the correct information (such as meter details including readings, change in property details, occupancy information) to enable them issue accurate bills for the service they provide;
- Credit reference agencies, debt collection and tracing agents – to check your identity, verify the accuracy of the information you have provided to us, manage your account, help us trace debt, collect money owed to us and prevent criminal activity, fraud and money laundering. We rely on our legitimate interests to do so. Please see the "Credit Reference Agencies" section below for more information and click here for more detail on the CRAs and the way they use and share Personal Data in the CRAIN;
- Our other partners who provide us with services (as discussed in more detail in the "Our Trusted Partners" section below). We rely on our legitimate interests to do so.

Credit Reference Agencies

When you open an account with us, for the duration of your account being open with us, and when you close your account, we may check your records with CRAs to check your identity, verify the accuracy of the information you have provided, and prevent and detect crime, trace and recovery action and fraud and money laundering.

Our checks also enable us to gain insight into our customers' financial behaviour to identify customers at risk of falling into debt so that we can target relevant support (eg. social tariffs).

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

The CRAs supply us with both public (including the electoral register) and shared credit and fraud prevention information that is shared within a closed group of CRAs. We also check your records with Fraud Prevention Agencies (FPAs). We also make checks to help us assess payment frequency and terms. We may also make periodic checks at CRAs and FPAs to manage your account with us (eg. to check occupier details).

We share information on all settled accounts so that we and our customers can benefit from our access to data sources, and it also contributes to a sustainable financial ecosystem, helping to prevent fraud, over indebtedness and responsible lending. Sharing positive payment records with CRAs benefit customers' credit ratings (as it shows they are paying our bills in full and on time), and may increase access to cheaper credit facilities.

We share information on accounts in arrears in order to help us make fairer debt collection decisions and also to act as a deterrent to non-payment of debts.

If you owe us money and, when requested, do not repay in full and on time, CRAs will record the outstanding debt. If we consider that your account is in default we will notify you and if you do not pay us we will report the unpaid debt to CRAs. This information may be supplied to other organisations by CRAs and FPAs to perform similar checks and to trace your whereabouts if you have moved without advising of a forwarding address so that they can recover debts that you owe. Records remain on file for 6 years after they are closed regardless of your payment behaviour.

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 FPAs and other organisations involved in crime and fraud prevention.

If you move and do not make payments that you owe us, we will trace your whereabouts to recover debts.

If you tell us that you have a spouse or financial associate we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs also link your records together and these links will remain on your and their files until such time that you or your partner successfully files for a disassociation with the CRAs to break that link.

We currently share your information with the following CRAs:

TransUnion

One Park Lane
Leeds LS3 1EP
0330 0247574
consumer@callcreditgroup.com

Experian

PO Box 9000
Nottingham NG80 7WP
0344 481 8000
consumer.helpservice@uk.experian.com

Equifax

PO Box 100436
Leicester LE3 4FS
0800 0142955

Find out more about credit and CRAs in the Information Commissioner's guide; 'Credit Explained':

<https://ico.org.uk/your-data-matters/credit/>

You can also get more detail on the CRAs and the way they use and share Personal Data in the Credit Reference Agency Information Notice (CRAIN) by [clicking here](#).

Ofwat Surveys

All customers who contact us may have their contact information passed to a third party processor acting on behalf of our water regulator Ofwat for the purposes of the Service Incentive Mechanism ("SIM"), Customer Measure of Experience ("C-MEX") or Developer Services Measure of Experience ("D-MEX") surveys. This helps to regulate customer service in the water industry in England and Wales. You may be contacted by this third party about the service you received from Welsh Water and asked to score our performance. This is not a marketing call. We share your Personal Data with Ofwat as part of our statutory requirements as a water and sewerage undertaker.

If you would prefer us not to share your details with Ofwat (and third parties acting on their behalf) let us know either by emailing us at: DataProtectionOfficer@dwrcymru.com or writing to us at: Data Protection Officer, Dŵr Cymru Welsh Water, Pentwyn Road, Nelson, Treharris, Mid Glamorgan CF46 6LY.

Other Surveys

We may use third parties, or our own employees, to help contact our customers to undertake customer satisfaction surveys or engagement processes. These are not marketing calls and your response is very important to us. We rely on our legitimate interests to do so. If you would prefer not to participate please let us know either by emailing us at: DataProtectionOfficer@dwrcymru.com or writing to us at: Data Protection Officer, Dŵr Cymru Welsh Water, Pentwyn Road, Nelson, Treharris, Mid Glamorgan, CF46 6LY.

Please note this will not stop communications for the purpose of supplying our water and waste water services or from our regulator. We still have to share your contact information with third parties who are working on behalf of our water regulator Ofwat for the purpose of the SIM, C-MEX or D-MEX (as outlined above).

Our Trusted Partners

We engage a number of trusted partners to assist us with, or carry out our activities on our behalf, and/or to improve our services to you. We rely on our legitimate interests to do so. We impose appropriate controls in these circumstances (including a binding contract that restricts their access to and handling of your Personal Data to what is necessary for their performance of the contract).

We use software providers for different systems, like our billing system, works order system, and meter reading system, to support us with the large amounts of data that we need to manage. We use companies to assist us with printing bills and customer communications and to help us process payments including card payments, payment cards and to process cheques. We also use contractors for mains replacement and pipe repairs and they will have access to some of your Personal Data relevant to their work.

Making a Complaint

If you make a complaint to us, we will follow our Complaints Procedure. We may need to share details about your complaint internally in order to fully investigate. If you escalate your complaint to The Consumer Council for Water (CC Water) we will share information with them in order to resolve your complaint. We will only use the Personal Data we collect to process the complaint in accordance with our complaints process. We rely on our legitimate interests to do so.

Open Water

If you are a business customer, using more than 50 Ml of water at a single site per year in our area of appointment, we will share information about you with Market Operator Services Limited ("MOSL") which facilitates the Open Water Programme. You can find out more information about how MOSL uses your information at www.mosl.co.uk/privacy-notice/.

7. Where we store your Personal Data and how we keep it safe

All customer Personal Data is held in our billing system in the UK, which has controlled access and is subject to strong cyber security measures. All access to our systems is strictly controlled. We also operate strict physical security at all our sites and employees all receive security and Data Protection awareness training.

Where we transfer Personal Data to third parties to enable them to process it on our behalf (see the information about Trusted Partners above), we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.

We may need to transfer your Personal Data outside of the European Economic Area (EEA). These countries may not have the same Data Protection laws as the UK and the EEA and so your Personal Data may not be subject to the same protections. However, in such cases, we will make sure that any transfer of your Personal Data to countries outside of the EEA is subject to appropriate safeguards as if it were being processed inside of the EEA and under the guiding principles set out in this Privacy Notice.

8. How long we will keep your Personal Data

We keep customer billing and correspondence for 7 years after the account has been closed. We hold call recordings for 12 months.

9. Automated decision making and profiling

We do not currently conduct any automated decision making as defined by Data Protection laws. We use profiling in the context of services we provide and customer analyses.

This processing forms the basis for data analysis, statistical research, and trend analysis in relation to services we provide, business and system developments, forecasting and other contributions to develop and improve our business activities.

10. Cookies

Please see our Cookie Policy on our website for information on our use of cookies.

11. Your Data Protection Rights

You have certain rights in relation to your Personal Data and can make different types of Data Subject Rights Requests in relation to the Personal Data we hold on you. Each of these rights may not apply in all circumstances, but we will ensure that we deal with any request we receive in a way which safeguards your rights and freedoms, and in compliance with the Data Protection laws.

If you would like to make a Data Subject Rights Request, please:

Email us at: DataSubjectRightsRequests@dwrcymru.com;

Write to us at: Customer Services, Data Subject Rights Request Team, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff CF3 0LT; or

[Click here](#) for our Data Subject Rights Request form.

Any individual whose information we hold can make a Data Subject Rights Request. A third party can make a request on behalf of an individual (e.g. a relative, friend, lawyer), but we need the consent of the relevant individual before we provide any of their Personal Data to the third party. Under certain circumstances, by law you have the right to:

- Request access to your Personal Data (commonly known as a "Data Subject Access Request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;
- Request correction of the Personal Data that we hold about you (also known as "rectification"). This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your Personal Data. Subject to certain conditions, this enables you to ask us to delete or remove Personal Data (eg. where your Personal Data is no longer needed for the purpose it was collected for, or where the relevant processing is unlawful). You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing and there is no overriding legitimate interest to continue that processing (see below);
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party), where we process Personal Data for a task carried out in the public interest or when exercising official authority vested in us and there is something about your particular situation which makes you want to object to processing on this ground;
- Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data (eg. if you want us to establish its accuracy or the reason for processing it);

- Withdraw your consent to processing. Where our processing of your Personal Data is based on your consent you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your Personal Data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point;
- Request the transfer of your Personal Data to another service provider (ie. also known as the Right to Portability) in the event that we are relying on your consent to process that Personal Information;
- Not to be subject to a decision based solely on "automated processing". We do not currently carry out any automated processing.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK Data Protection regulator. More information can be found on the ICO's website at <https://ico.org.uk/>

12. Updating our Privacy Notice

We will keep our Privacy Notice updated as our business processes and procedures, and/or the Data Protection laws, change. Our most up to date version will always be on our website.

13. Visitor Attraction Centres Privacy Notice

For information on how we handle the Personal Data of visitors to our Visitor Attraction Centres please see our Visitor Attraction Centres Privacy Notice.