

Our Priority Services Customers Your Privacy Matters



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Our Priority Services Customers

Your Privacy Matters

Our Priority Services Customers - Your Privacy Matters

We take the protection of your personal data seriously. We'll explain how we do this below, but if you want to know more, our full Privacy Policy is available to read here:

- Northumbrian Water customers: <https://www.nwl.co.uk/privacy/>
- Essex & Suffolk Water customers: <https://www.eswater.co.uk/privacy/>

As a Priority Services customer, we appreciate the trust you put in us with important, often sensitive, information about yourself. Our Privacy Promise is designed to give you all the reassurance you need that we are protecting your information properly.

Our privacy promise

We promise that we will:

- Process your personal data fairly and lawfully
- tell you how we will use your personal data
- only collect personal data about you when we need it for legitimate purposes, or legal reasons
- ensure that your personal data is adequate, relevant and not excessive for the purposes for which we collect it
- not keep your personal data for longer than we need to for those lawful purposes
- keep your personal data secure
- ensure we have robust controls in place to prevent unauthorised access to, or use of, your personal data
- ensure that you know how to exercise your rights in relation to your personal data, and
- require any third parties who work with us to take similarly appropriate steps to protect your information.

Recording your data as a Priority Services customer

We record your data:

- if you tell one of our employees you need help in certain circumstances
- when you have instructed a trusted partner organisation to pass your information to us
- when a friend or family member tells us you need support
- when a trusted partner organisation shares information about you

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- if one of our employees visits your home, and thinks you would benefit from being on the Priority Services Register

We ask for information about you, for example, if you have communication needs, problems with mobility or other health issues that might have an impact on the way we deliver our services to you. This is so we can get in touch with you in a way that you prefer and so we can provide support during planned works or unplanned interruptions to your water supply. You don't need to tell us anything about yourself if you don't want to.

We only use your data to:

- provide you with the specific support you need (such as sending your bills in Braille or large print)
- provide you with support in an emergency (such as sharing data with trusted partners to deliver essentials like bottled water)
- contact you during water supply interruptions (such as telling you about any works we need to do which may affect you, or offering emergency water supplies)
- inform our employees of your requirements before they visit (such as allowing extra time to answer the door or to remember to use your chosen password), and
- undertake market research so we can continue to improve your services.
- ensure you are provided with the support you need from your other utility companies.

Reviewing our Priority Services Register

We make sure that we only ask you for the information we need for your application. The list below shows you the information we would collect about you as a Priority Services Customer:

We will collect the following information about any health or medical conditions that mean you need tailored Priority Services to make managing your account easier, such as:

- A preference for an alternative literature format such as Braille, large print, audio, EasyRead or bill read
- Blind
- Chronic/Serious illness
- Deaf
- Dementia
- Developmental Condition
- Elderly
- Hard of Hearing
- Infirm
- Language Barrier
- Literary Problems/Learning Disability

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- Medical Dependency - mainly for dialysis, however the Ofgem approved codes include all types of medical equipment.
- Mental Health Issues
- Partially Sighted
- Password
- Physical Impairment
- Speech Impaired
- Supported Living
- Temporary - this includes bereavement, Life Change (divorce/job loss), Pregnancy/families with young children, Post hospital recovery & Young adult householder.
- Further information about how can we help you
- Notification of interruption to supply/Bottled water request

We review our Priority Services Register every two years, to check that we still need to use your data. If you get in touch with us, our advisors may ask you if the information we have is correct and still meets your needs, or we may contact you to see if your circumstances have changed and if you need different support from us.

The legal summary

When we collect or use the data of Priority Services Customers we must have a legitimate reason for doing so. Data protection law tells us how we can use your data. We register you as a Priority Services Customer under something called 'substantial public interest'. The substantial public interest allows us to act in your best interests as our customer. For example, while we do our best to collect registration information directly from you, we realise that this might not always be possible for you. We are therefore allowed to accept registrations from third parties on your behalf. Your relatives, carers, authorised third parties etc. can act on your behalf when it is in your best interest to do so. When this happens, we will let you know that you have been added to the register, and we will send you all the information you need about this service. We may also share your data with trusted partners in the utility sector, so they can provide support to you if you receive services in their area.

The legal aspects in detail

If you would like to read more about the legal rules which allow us to use your data, this section is for you.

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We process your data for the purposes of the Priority Services Register on the basis of substantial public interest. The General Data Protection Regulation 2016 (GDPR) now UK-GDPR, Article 9(2)(g) permits us to process such data if:

processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

We also have the Data Protection Act 2018 (DPA 2018) which supplements UK-GDPR. If we are processing under substantial public interest, we also have to ensure that what we are doing falls within a specific condition listed in the DPA 2018 Schedule 1. The DPA 2018 Schedule 1, Part 2 paragraphs 6 and 18 specify how we record and keep your data, including details of any health conditions you may have, so we can tailor our priority services to you. Paragraph 6 permits us to record data for statutory, governmental and other related purposes. Paragraph 18 allows us to record data for the safeguarding of children and individuals at risk.

If you'd like to be removed from the Priority Services Register

We understand that you may want to be removed from the Priority Services Register in the future. We review all removal requests, and our specialist advisors will discuss this with you before taking any action because we want to be sure you have the support you need. There may be instances where we will not remove you from the Priority Services Register, for example if you are dependent on water and wouldn't be able to get to a collection point, would need an alternative supply delivered to you, or if you use a dialysis machine, but this will be discussed with you at the time.

Technical security

We are very careful about safeguarding your data and restricting access to the systems in which it is stored. We have a dedicated security team here who look after the technical security of our systems and you can find more detailed information about this in our full online privacy policy at www.nwl.co.uk/privacy or www.eswater.co.uk/privacy.

Reviewing our policy

We review our privacy policy at least once a year, or earlier when there are changes to legislation or our processes.

Last update

This document was last updated on 29.06.2023 (Version 4).