

# SMART METERING PRIVACY NOTICE



## 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 and Suffolk Water Customers: <https://www.eswater.co.uk/privacy/>

As our customer, we appreciate the trust you put in us with 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.

## What is personal data?

Water consumption data, together with other data associated with your smart meter (see **What personal data is collected?** below) is regarded as personal data. Personal data is any data which can be used to identify you, whether on its own or when combined with other data.

The types of personal data which Northumbrian Water collects about you will include your name and contact details, your property identification number, meter serial number, property information, occupier details and account information.

## What is smart metering in water?

If you have a smart water meter installed in your home, it collects and sends data to us showing the flow of water into your property via a wireless network. A smart meter can also be referred to as AMI (Advanced Metering Infrastructure), enhanced metering or an upgraded meter.

Smart meters are normally fitted externally to your home, in a chamber on the footpath or within the boundary of your home. If we have replaced an older internal meter or if the type of property doesn't allow for an external placement, this will be inside your home.

## Why is the water industry introducing smart metering?

When you can see how much water you use, you can manage your consumption better, and thus control your bills. Smart meter data allows us to give you an accurate bill, rather than an estimated one, where we have network coverage. This breadth of data will help us to manage long-term resources better, using real water consumption figures. For example, if we know how much water is delivered to customers' properties then, by looking at the total volumes put into the network, we can assess how much is being lost through leakage. We can then identify, and fix, those leaks more quickly. This is of clear benefit throughout our supply area, but particularly so in areas of water stress such as the South East.

We will also be able to share data electronically with suppliers, saving time and costs, which is then reflected in customer bills.

## What data do smart meters collect?

Smart water meters collect three main types of data (*smart metering data*):

- **Smart meter ID/Radio ID** - a unique identification number used to identify individual smart meters
- **Water consumption data** – meter readings, timestamps, and minimum water flowrates for the metered properties.
- **Alarm data** – smart meters can produce data relating to eight different types of alarms, which will alert us to things such as leaks, burst pipes, back flow, low meter battery and meter tampering.

Smart metering data will be linked to the individual meter details (water flow/consumption data, meter ID), property information (property type, residency type). This data is collected hourly.

From your point of view, the key data collected is likely to be the amount of water used.

By analysing consumption, we can spot abnormal usage patterns which helps us to identify a leak within a property and act promptly to help remedy this. It is a priority for us to address burst or leaking network pipes.

Hourly consumption data helps us ensure we can maintain adequate water pressure during periods of peak demand (peak and minimum flow analysis), gives us a better idea where water is going, and therefore helps us identify the root cause of events more quickly, such as changes in pressure or demand for water across the network.

Consumption data will be collected at 15-minute intervals between 2am and 4am. Sometimes referred to as the 'nightline', this allows us to accurately detect customer-side leakage when planned usage is at a minimum.

## What are the lawful bases for processing smart water meter data?

We can only process your personal data where we have a lawful basis for doing so.

Here are the ones we rely on in relation to smart metering:

### Legal obligation

We need to process your data to comply with a legal obligation under the Water Industry Act 1991.

### Public task

We need to process your data to allow us to carry out a task in the public interest given our role as a statutory water and sewerage undertaker.

We have legal obligations to supply water, maintain water quality, promote water efficiency, and maintain adequate drainage in line with rules set by our regulators.

**Legitimate interests**

We need to process your data for our legitimate interests, or those of a third party, and this requirement is not overridden by your individual rights.

The table below looks at how we use your personal data, and the lawful basis which allows us to process it.

<b>What we do with your personal data</b>	<b>Lawful basis for processing</b>
<p><b><i>Improve our billing service</i></b></p> <p>Smart data allows us to provide more accurate bills (actual meter reads, not estimates) without you having to take a meter read, or us sending out meter readers.</p>	<p><b><i>Legal obligation</i></b></p>
<p><b><i>Improved network efficiency</i></b></p> <p>Real consumption figures (anonymised) allow us to see how much water is being used within the network, rather than relying on estimates.</p>	<p><b><i>Legal obligation</i></b></p>
<p><b><i>Check remotely for any leaks</i></b></p> <p>This helps you avoid paying for water going to waste</p>	<p><b><i>Public task</i></b></p>
<p><b><i>Improving asset maintenance</i></b></p> <p>Smart meter data shows us at once where a meter has failed so we can repair it promptly. This reduces leakage and water waste.</p>	<p><b><i>Public task</i></b></p>
<p><b><i>Improving customer services</i></b></p> <p>Smart meters give you daily, weekly and monthly consumption data so you</p>	<p><b><i>Legitimate interests</i></b></p>

<p>can understand your usage better and reduce your bills. You will no longer have to send us meter readings, which saves your time. Looking at your consumption data, we can offer you tips on water saving customised for your own usage.</p>	
<p><b>Helping us to help customers better</b></p> <p>Daily smart reads help us to manage the customer Move In, Move Out process better. Electronic meter reading saves you, and us, time all round. Accurate data means we can answer account queries more easily. We will also be better placed to identify empty properties.</p>	<p><b>Legitimate interests</b></p>
<p><b>Helping demand management</b></p> <p>Having real water consumption readings (anonymised) helps us compare the volume of water used as against the amount we put into the network. This helps us with managing leakage.</p>	<p><b>Legitimate interests</b></p>
<p><b>Research</b></p> <p>The aggregated, anonymised smart meter data helps us analyse the performance of our water network and plan our supply strategy for the years ahead.</p>	<p><b>Legitimate interests</b></p>

### Who do we share the data from your smart meter with?

We may share data from your smart meter with the following categories of third parties for the purposes listed below and/or in the following circumstances:

- with our third party suppliers and contractors (data processors) who carry out tasks and activities using smart meter data on our behalf, e.g. contractors (who need this information to carry out work for us such as fixing leaks on our network), bill printing service providers.
- with Debt Collection Agencies and solicitor firms instructed by us to recover customer debt;
- with Courts (including the County Court Bulk Centre) and High Court Enforcement Officers;
- with third parties making disclosure requests permitted by data protection legislation, e.g. police, local authorities, HMRC, our economic regulator (Ofwat)

- with regulators who require us to share smart meter data for regulatory investigations, such as the Drinking Water Inspectorate (DWI) and Environment Agency (EA) and with the Consumer Council for Water (CCW);
- with research organisations for research (on an anonymised, nonpersonal basis);
- with Housing Associations and Councils;
- with our IT partners who host, manage and develop IT solutions for us;

When we use third party organisations to help provide services to you, we have robust contracts in place with them to ensure they only act in accordance with our instructions.

### **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](http://www.nwl.co.uk/privacy) or [www.eswater.co.uk/privacy](http://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**

Version 2: This document was last updated on 28.09.2023