

SMART METERING PRIVACY NOTICE

Reference: Issue No: 3SM.0

PN 21101

Issue Date: 05/10/2022

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1. Introduction

This privacy notice tells you how we collect and use your personal data when you have a smart meter (also known as an enhanced meter, upgraded meter or AMI meter) installed on the water supply to your home. It should be read in conjunction with Anglian Water's Customer Privacy Notice (see [Anglian Water Customer Privacy Notice](#)).

If you do not have a smart meter, you should refer to *Anglian Water's Customer Privacy Notice* for information on how your meter data is collected and used.

If you're unsure whether you have been upgraded to a smart meter, please phone our call centre on 03457 919 155.

Personal data is any data which can identify you or be used to identify you. It can identify you either on its own or when joined to other data. Water consumption data and other data associated with your smart meter is considered personal data.

2. Who are we?

Anglian Water Services Limited ("Anglian Water") is a company incorporated in England (company number 2366656). Anglian Water is licenced by the Water Services Regulation Authority (Ofwat) to supply water and water recycling services to customers in the East of England and Hartlepool. Anglian Water is the principal subsidiary of the Anglian Water Group. Anglian Water also trades under the names of AW Direct, Geodesys, Digdat and Hartlepool Water.

You can contact our Data Protection Officer by writing to:

Data Protection Officer, Legal Services, Anglian Water Services Ltd,
Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon
PE29 6XU

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Or email us at DPO@anglianwater.co.uk

Alternatively, you can phone our call centre on 03457 919 155

3. When do we collect data from your smart meter?

Once we have installed a smart meter at your home, we will collect water consumption data and other data from your meter. We collect this information on an hourly basis.

If you have not had a meter upgrade and have an ordinary, traditional meter, please refer to our *Customer Privacy Notice* for information on how we process your meter data.

4. What data do we collect and use from (or about) your smart meter?

The data we collect and use from your smart meter includes:

Personal data and other data types collected from a smart meter:
Meter radio ID - the serial number of the radio within the meter (the radio is used to transmit data to Smartpoint (explained below))
Meter reading - number of litres that has passed through the meter since it was manufactured
Date and Time stamp
The serial number of the local communications device (Smartpoint) that receives data transmitted from the radio within your meter and then relays it to our Network Provider's network interface
The hourly consumption readings for the previous 24-hour period

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Alarm parameters which tell us that there may be a problem with your meter (e.g. magnetic tamper, backflow, continuous flow)
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Meter location data (geolocation co-ordinates of where the meter is situated)

Data we collect from your smart meter is combined with other data, including personal data, that has already been collected and is currently being processed by Anglian Water for other purposes, e.g. customer data (name and contact details), property identification number, meter serial number, account information etc. For more information on how Anglian Water uses personal data generally, *please refer to our Customer Privacy Notice*.

Special Category Personal Data

Different rules apply to data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, data concerning sexual orientation or sex life, along with biometric and genetic data, which are all called special category personal data.

The data that we collect and use from your smart meter does not fall within the category of special category personal data.

For information about the special category personal data that we process, *please refer to Anglian Water's Customer Privacy Notice*.

5. Why do we need to collect and use personal data from your smart meter and what is the legal basis for using it?

We collect and use the data from your smart meter for a number of purposes which are explained below, along with the legal basis which we rely on when using it:

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Why?	Legal Basis
To detect leaks on your supply By using smart meter data, we can check remotely for leaks on your supply and work with you to avoid unnecessary charges and wasted water.	Public Interest / Official Authority
To provide you with improved customer services We use daily meter reads to provide you with improved customer services, for example access to your usage information (in the form of daily, weekly and monthly consumption data), to provide you with monthly comparison information so that you can understand your usage better and save, to offer a water survey and give you water saving tips, and to send you reminders. We will also use daily meter reads collected remotely from your smart meter instead of asking you to take meter readings and send them in to us.	Legitimate Interests

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<p>To improve our customer account management processes</p> <p>For example, by using daily smart meter reads we can more efficiently process move in and move out requests, automate the meter read process and use up to date accurate meter reads to support you with account queries. We will also be able to more efficiently identify and manage the supplies at empty properties.</p>	Legitimate Interests
<p>To offer you additional customer services; access to your hourly water consumption</p> <p>If you're using water at the property, with your permission we can show you an hourly breakdown of your usage in MyAccount. If you sign up for this service, our customer care agents will also see this information so they can help if you need to speak to us about your consumption.</p>	Consent
<p>To improve our billing process</p> <p>By using smart meter data we can provide you with more accurate bills (based on actual, up-to-date meter reads) without asking you to take a meter reading or sending out a meter reader, and you can use MyAccount to generate a bill whenever you need.</p>	Legal Obligation
<p>For improved asset maintenance</p> <p>For example, we can spot where a meter has failed, diagnose the issue and get one of our technicians to repair it.</p>	Public Interest / Official Authority

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For improved management of the water supplied into the network to meet customer water supply demands For example, using real water consumption readings (anonymised and aggregated) we can see how much water should be being used by customers in a defined area and then, by comparing those figures with the volume of water supplied into the network, we can identify where there are leaks on Anglian Water's pipes which we can then find and fix.	Legal Obligation
Improved regulatory reporting For example, by using real water consumption readings (anonymised and aggregated) we can see how much water is used compared to the amount we put into the network for customer supply to improve our leakage estimate data.	Legitimate Interests
Research and analytics For example, we may use data to analyse the performance of the data transmission network, or connectivity performance, or use anonymised meter data to understand the impact of weather or social events on water consumption in the long and short terms so that we can more accurately plan our water supply strategy for the future.	Legitimate Interests

Public Interest / Official Authority

There are some circumstances where processing your smart meter data is necessary for the performance of a task carried out in the public

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interest or in the exercise of official authority, e.g. to detect leaks on a customer's water supply.

Legitimate Interest

Sometimes our use of smart meter data is necessary for the purposes of Anglian Water's (or a third party's) legitimate interests, always ensuring that the use of personal data to pursue legitimate interests does not materially impact your rights, freedom or interests, and that the use of data is what might reasonably be expected as part of running our business.

Consent

We will ask your permission (consent) before making hourly usage information available to you and our customer care team. Whenever we rely on consent, we will clearly ask for it and we will provide you with information on how we will use your data.

If you change your mind and decide you no longer want access to your hourly usage information or have it available to our customer care team, tell us (by changing your preferences in MyAccount) and we will stop using it for that specific purpose and you will no longer receive those services.

This does not mean that we will stop using your hourly meter readings entirely (see above for the other reasons for processing smart meter readings where we do not rely on consent as our legal basis for processing), rather that we will not make hourly usage information available to you or our customer care team.

As a smart meter customer, you will always have access to daily, weekly and monthly usage information. Consent is only relevant for access to hourly usage information.

We treat access to hourly usage data in a different way because information which includes more frequent meter readings could reflect

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information about your family's private life which you would prefer not to be accessed in this way.

Legal Obligation

When we use smart meter data to ensure improved management of water networks (so that we can meet customer demand and comply with regulatory obligations), the use of the data is necessary in order to comply with legal obligations imposed upon Anglian Water by the Water Industry Act 1991 and by our regulators, e.g. conditions which are set out in the Licence which is issued by Ofwat.

6. 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. our Smart Meter Network Provider, our Alliance Partners and contractors (who need this information to carry out work for us such as fixing leaks on our network);
- with Business Process Outsourcers (e.g. a supplier providing bill printing services);
- with organisations who bill on our behalf, such as Norwich City Council, Cambridge Water, Affinity Water, Severn Trent Water, Essex and Suffolk Water and Thames Water;
- with Debt Collection Agencies and solicitor firms instructed by us to recover customer debt;

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- 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 contracts in place with them which means that they can't do anything with your personal data unless we've instructed them to do it. They won't share your personal data with any other organisation unless they are instructed by us to do so. They will hold it securely and retain it for the period we instruct.

7. Where your smart meter data may be processed?

Sometimes we will need to share your personal data with third-party data processors in countries that are outside the UK, and some of those will be outside the European Economic Area (EEA) (such as India or the USA).

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When we do this, we put adequate safeguards in place to ensure your data receives the same protection as if it were being processed within the UK or the EEA. If you wish for more information about how your data may be processed outside the UK or EEA, please contact us.

8. Automated Decision Making and Profiling

Automated decision making involves making decisions using your personal data without manual intervention. When using smart meter data, we use automated decision making to:

- Ascertain whether a customer is likely to have a leak on their water supply or not

We will also carry out other automated processing of smart meter data, including profiling (the automated processing of data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict behaviours, financial status, preferences, movements etc). Examples of automated processing activities using smart meter data include:

- to understand our customers and to tailor and personalise our processes and communications
- to provide daily, weekly and monthly water usage information, monthly comparison information (including a 'similar home comparison' and 'top 20% efficient comparison') to help you understand your water usage and save water.
- robotic process automation (RPA) to automate processes traditionally carried out by a human for enhanced data accuracy, quicker processing times and improved process governance
- analysis to understand the impacts of weather or social events on water consumption in the long and short terms, so that we can more accurately plan our water supply strategy for the future

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When we make an automated decision that affects you, or when we profile smart meter data, we will implement suitable measures to safeguard your rights, freedoms and legitimate interests, which will include the right to obtain human intervention on the part of Anglian Water, to express your point of view and contest any decision made. You can ask for a manual review of any automated decision.

9. How long will we keep your smart meter data?

Whenever we collect or process your smart meter data, we'll only keep it for as long as is necessary for the purpose for which it was collected. The retention periods for smart meter data records vary. If you would like more information on retention, please contact us using the contact details in section 2.

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10. What are your rights over your smart meter data?

You have a number of rights in relation to the smart meter data that we hold about you. Specifically, you can:

- ask for a copy of that information, free of charge in most cases
- ask for information about how we process your data
- ask us to change it if it's wrong
- in certain specific circumstances, ask us for the data to be removed from our records
- in some specific circumstances, you can ask us to stop processing your data
- in some circumstances, ask for your data to be given to you in a format that you can use to transfer to another organisation
- object to certain types of processing of your data, such as direct marketing which you can object to and stop at any time. You can object to processing carried out on legitimate interests grounds, including profiling, and we will provide you with our reasons for that processing. If you do not agree with those reasons, you can refer the matter to the Information Commissioner's Office

If we refuse a request under the above rights, we'll tell you why. You have the right to complain as outlined in section 11 below.

All of the above requests may, where necessary, be forwarded on to any third party we use (see section 6 above) in the processing of your personal data.

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To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make in the exercise of your data protection rights. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you want to exercise these rights, please contact Customer Services:

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Write to us at Anglian Water, PO Box 4994, LANCING, BN11 9AL, or

Email us at customerservices@anglianwater.co.uk, or

Telephone our call centre on 03457 919 155

If we are unable to action your request, we'll explain our reasons to you.

11. Complaints

You may complain to us about how your personal data is being processed using the contact information in section 2 above.

You can also complain to the Information Commissioner's Office (ICO) by phone on 0303 123 113, online at www.ico.org.uk or by writing to them at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

12. Your Responsibilities

You need to tell us when you are no longer liable to pay for our services. This could be, for example, because you have moved house, or it could be due to a change to the individuals who are jointly liable with you (for example, if you and your partner or spouse separate and you

remain at the supply address, you must tell us that your former partner/spouse is no longer resident with you).

If you don't tell us, it could result in incorrect data being processed, shared and used, which in turn may affect how other organisations view your creditworthiness.

13. Any Questions

We hope this Smart Metering Privacy Notice has been helpful in setting out the way we handle your personal data and how you can exercise your data protection rights. If you have any questions that haven't been covered, please contact our Data Protection Team who will be pleased to help you:

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Email us at DPO@anglianwater.co.uk, or

Telephone our call centre on 03457 919 155

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