



# Thames Water Privacy Notice

Household and business  
customers

January 2021



## Introduction

This section of our Privacy Notice explains how we use our customers' data for the purposes of:

- [Managing customer accounts](#)
- [Managing customer debt](#)
- [Responding to customer complaints and queries](#)
- [Carrying out customer surveys and research](#)
- [Helping vulnerable customers](#)
- [Providing your water or wastewater services including Smart Metering \(households\)](#)
- [Providing your water or wastewater services including Smart Metering \(non-households\)](#)

## Managing customer accounts

### **Purpose (lawful basis for processing)**

To manage your accounts, we need to keep reliable, accurate and up-to-date records of your details, in order to send out bills and process payments, as well as any associated interactions with you.

The lawful basis we rely on for processing your personal data for this purpose is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **public tasks** to meet our obligations as a regulated business, such as compliance with Water Industry Act 1991 and with requirements set by our regulators such as Ofwat.

Where we need to process special category data for this purpose, our legal basis is **substantial public interest** (Article 9(2)(g) of the GDPR)

Our legal basis for sharing your personal data with our leakage and drainage insurance partners for marketing purposes is Article 6(1)(f) of the GDPR, which allows us to process personal data when we have a **legitimate interest** in doing so (we have a legitimate interest in managing our business efficiently and profitably), provided we do not unreasonably override the interests or rights of our customers.

### **What type of personal information do we process for this purpose?**

This includes:

- Identification and contact data to open your account, such as name, postal address, email address, phone number
- Billing information e.g. supply and billing addresses, meter serial number and readings, occupancy, council tax band
- Payment information e.g. bank details, payment transactions
- Financial performance history – credit reference history
- Notes of customer interactions
- Voice recordings of some customer interactions for staff training and quality assurance
- Technical information required for webchats e.g. IP addresses

- Information about special access needs e.g. communications in braille
- Marketing preferences

You and/or your representatives/attorneys will provide most of this information via our website, phone calls, social media, email and post.

We also use third parties to help us process your information, as explained below.

### **Sharing data with third parties**

The main types of third parties with whom we share personal data include:

- Contractors who provide call centre support and back office support, e.g. supplying software and systems and related support and maintenance
- Accessibility service providers, e.g. translation services
- Our leakage and drainage insurance partners, depending on our customers' marketing preferences. These preferences can be changed by calling us – please see the Contact Us section of this Privacy Notice.
- Processors to handle customer payments
- Processors to handle meter billing analysis
- Data providers to update our customer records where we have gaps
- Other water companies that bill customers on our behalf in areas where we provide sewerage services but not water services
- Local authorities for billing blocks of flats where applicable

For further details, please see the list of third parties which is given on our [privacy page](#).

## Managing customer debt

### **Purpose (lawful basis for processing)**

Our purpose is to use your data to inform our debt collection strategy, manage our debt collection process and minimise our customer debt risk, using information regarding the relevant customer accounts. We need to minimise customer debt so we can continue to provide our services to all our customers in a cost-efficient way.

Our legal basis for using your personal data to manage debt collection is Article 6(1)(f) of the GDPR, which allows us to process personal data when we have a **legitimate interest** in doing so (we have a legitimate interest in managing our business efficiently and profitably), provided we do not unreasonably override the interests or rights of our customers.

### **What type of personal information do we process for this purpose?**

This includes:

- Customer contact details
- Customer account details
- Customers' payment history with us and with other organisations
- Information about joint account holders liable for owing payments

The information is provided by you and by third party partners as outlined below.

### Sharing data with third parties

The main types of third parties with whom we share personal data include:

- Our call centre support contractors
- Credit Reference Agencies (CRAs). More information on how we use CRAs is given in [Annex 1](#) in this document
- Debt Collection Agencies, including tracing agencies, investigators and bailiffs
- Our legal partners
- Data providers to update our customer records where we have gaps. For example, where we believe that a customer owes us money, but we do not have a telephone number associated with that customer's account, we use a telephone number provided by a third party. The customer can ask for this to be deleted if incorrect and replaced with the one they provide.

For further details, please see the list of third parties which is given on our [privacy page](#).

## Responding to complaints and queries

### Purpose (lawful basis for processing)

Our purpose is to use this data to investigate your complaints and queries, sometimes involving our regulators such as Ofwat and the ICO, acting in line with our regulatory duties, which include:

- Processing payments to you when our service is below standard in line with our Customer Promise (Customer Guarantee payments) and regulatory requirements (Guaranteed Service Standards payments)
- Responding to Data Protection Requests and to Environmental Information Regulation requests in line with our obligations under the Data Protection Act 2018 and GDPR and Environmental Information Regulations 2004

The lawful basis we rely on for processing your personal data for this purpose is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **Public Tasks** as a regulated business, such as compliance with Water Industry Act 1991 and with requirements set by our regulators such as Ofwat.

### What type of personal information do we process for this purpose?

This includes:

- Customer contact details
- Information regarding the nature of the complaint/query/claim/request
- Information required to address the complaint/query/claim/request
- Customer contact transactions

- Voice recordings of some customer interactions to assist in dealing with the complaint/query/claim/request

The information is provided by the customers who contact us and is processed by ourselves and third-party processors.

### **Sharing data with third parties**

The main types of processors with whom we share personal data include:

- our call centre support and back-office support contractors who provide software and systems and related support and maintenance
- regulators such as the Consumer Council for Water, Ofwat, and the ICO if the complaint has been escalated to them
- our legal partners when legal advice is required
- our claims handling agents

For further details, please see the list of third parties which is given on our [privacy page](#).

## Carrying out customer surveys and research

### **Purpose (lawful basis for processing)**

Our purpose is to use this data to understand, directly from our customers, how well we're currently doing. We use this feedback to improve our customer service.

A couple of these service feedback surveys are commissioned by Ofwat, targeted at our household customers (CMEx) and developer services customers (DMEx). We do not carry out these surveys ourselves but provide the required customer details to the agency used by Ofwat to carry out the surveys. Our legal basis for using your personal data to do this is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **public tasks** as a regulated business to comply with regulatory expectations and requirements.

All other types of surveys that we commission ourselves are carried out under the legal basis of **legitimate reason** (Article 6(1)(f) of the GDPR), as we have a legitimate interest in managing our business efficiently and profitably, provided we do not unreasonably override the interests or rights of our customers.

### **What type of personal information do we process for this purpose?**

The information processed includes customer contact details and survey responses.

One type of survey (by Rant & Rave) is triggered by our interactions with you or during service failures. Other than the Rant & Rave survey, you will always be asked whether you wish to remain anonymous to Thames Water.

You can opt out of these surveys at any time. The information is never used for marketing purposes

The information is provided by you and is processed by us and by third party processors.



## Sharing data with third parties

We use a small number of market research agencies that all conform to the Market Research Society Codes of Conduct.

We share customers' contact details and marketing preferences with Ofwat's market research partner to enable it to carry out customer satisfaction surveys on behalf of Ofwat.

For further details, please see the list of third parties which is given on our [privacy page](#).

More information about our customer market research can be found in [Annex 2](#) in this document.

## Helping vulnerable customers and managing our Priority Service Register

### Purpose (lawful basis for processing)

Our purpose is to use this data to:

- provide priority services to vulnerable customers in respect of
  - preparing for any planned service interruption;
  - dealing with customers in appropriate priority based on their needs (such as contacting them about any interruption); and
  - responding when we have a service failure, e.g.a supply interruption, so we can provide alternative supplies quickly and appropriately
- provide support to vulnerable customers who are struggling to pay their bills

Our legal basis for using your personal data to do this is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **public tasks** as a regulated business. Helping our vulnerable customers and households and developing our Priority Services Register membership and services is an important objective we wish to meet, and it's also required by our regulator, Ofwat.

Where we need to process special category data for the purpose of providing a priority service to vulnerable customers based on their health related data (e.g.a dialysis need), our legal basis is **substantial public interest** (Article 9 (2)(g) of the GDPR). As we are processing special category data under this legal basis, we have put in place an "appropriate policy document" in line with the DPA 2018, Schedule 1 condition for processing. This document can be found on our website (<https://www.thameswater.co.uk/help/extra-care/priority-services>).

Where we need to process special category data for the purpose of providing support to customers who are struggling to pay, our legal basis is **explicit consent** (Article 9(2)(a) of the GDPR).

### What type of personal information do we process for this purpose?

The information processed includes:

- Customer contact and account data
- If different, name and contact data for the affected vulnerable individual in the customer's household

- If the affected vulnerable individual is unable to represent themselves, the name and contact information of their official or unofficial representative (and, if available, evidence of their authorisation)
- Priority Services registration information provided by the customer via a webform and/or by third parties such as charities
- A 'needs code' and relevant service code will be allocated based on the information provided about the vulnerability
- Responses from Priority Services customers when surveyed after a service incident to assess the level of help we provided
- Information provided when customers apply for aid schemes such as the Thames Water Customer Assistance Fund, the Thames Water Trust Fund (grants), WaterHelp (percentage discounted bill), WaterSure (capped bill), or Water Direct (paying your bill direct from your benefits)

The information may be provided by the vulnerable individual, the customer for the household if different, individuals (including family members) acting on behalf of customers and relevant third parties such as charities.

### **Sharing data with third parties**

We share customer account information and completed application forms for the Customer Assistance Fund with a third party that manages the Fund on our behalf. The same third party also processes the Priority Services registrations for us.

During a service failure, we share details of the Priority Services Register with third parties so that the customers affected can be helped quickly and effectively. For example, we use a courier to deliver bottled water to the doorstep.

We may also receive Priority Services information from other trusted organisations and share our Priority Services Register data with them if they can help to keep you safe. Details of any current organisations are given in our list of 3<sup>rd</sup> parties, found as a link in our main privacy page <https://www.thameswater.co.uk/legal/privacy-policy> .

After a service failure, we ask the affected Priority Services customers for optional feedback on how well or otherwise we helped them, via one of our market research agencies. The data is not analysed or reported at individual customer level.

We share the personal details of customers applying for WaterHelp, WaterSure and Water Direct with the Department of Work and Pensions. We may receive assisted fund applications from other agencies, such as charities, on behalf of customer households containing a vulnerable person and in need of financial assistance. Our website (<https://www.thameswater.co.uk/help/extra-care>) gives more information on how to apply for these schemes

For further details, please see the list of third parties which is given on our [privacy page](#).

## Providing your water and/or wastewater services (household customers)

### Purpose (lawful basis for processing)

Our purpose is to use this data to help us provide you with an efficient and reliable water and/or wastewater service by carrying out activities such as:

- Supplying you with water and/or disposing of your wastewater, in line with our legal and regulatory obligations
- Recording and fixing a service problem, e.g. blockages, sewer flooding incidents, water pressure issues and repairing burst water pipes
- Maintaining our pipes and other assets
- Dealing with emergency situations
- Maintaining, monitoring and reporting drinking water quality
- Estimating unmeasured water use and carrying out water efficiency visits
- Metering (including smart metering) – making appointments, meter fitting and repairing, collecting meter readings, meter data analysis and reporting
- Fitting and maintaining sewer flooding mitigation devices (FLIPS)
- Customer communications around street works and service incidents
- Dealing with claims and providing emergency accommodation after service incidents
- Demonstrating compliance with our legal obligations to our regulators

Our legal basis for processing personal data for these activities is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **public tasks** as a regulated business, as 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. These obligations include compliance with legislation such as the Water Industry Act 1991.

Where we need to process special category data for this purpose, our legal basis is **substantial public interest** (Article 9(2)(g) of the GDPR).

### What type of personal information do we process for this purpose?

The information processed includes:

- Customer name and contact details such as email address, phone number supply address as required to provide a service or fix a problem. We also use customers' surnames in water use analysis.
- Asset and incident information linked to the service that may identify the customer (or other relevant caller) e.g. meter serial number, sewer flooding incidents
- Household meter readings, including hourly meter readings for those households with smart water meters. All new households are now fitted with meters that are smart capable. More information on why we need smart meters and how we use your smart meter data is given on our website <https://www.thameswater.co.uk/help/water-meters/getting-a-water-meter>
- Information required to process insurance claims, for example where there's damage to a property due to flooding from our asset
- Information required to produce regulatory reports, for example reporting number of customer complaints



The information is provided by customers and relevant third parties such as our operational service providers.

More general information on metering can be found on our website <https://www.thameswater.co.uk/help/water-meters>

### **Sharing data with third parties**

To provide our services in an efficient and effective way, we share your data with our service providers and associated third parties. For example, meter readings and blockage clearances are carried out by two different service providers.

For further details, please see the list of third parties which is given on our [privacy page](#).

### **Providing your water and/or wastewater services (non-household customers)**

Non-household customers are non-incorporated businesses whose retail services (e.g. customer services, billing) are provided by a separate water retail company, but whose premises are physically connected to our water and/ or wastewater network. We provide these customers with a wholesale service.

Insofar as limited personal information is collected in relation to non-incorporated businesses, both Thames Water and the relevant water retailer are each separate Controllers of the personal data of the non-household customers in our service areas. Where additional services are offered, there are times where we may act as a processor on receipt of instructions from the water retailer.

### **Purpose (lawful basis for processing)**

Our purpose is to use this data to provide a wholesale water and/or wastewater service to our non-household customers and their retailers by carrying out activities such as:

- Supplying non-household customers with water and disposing of their wastewater, in line with our legal and regulatory obligations
- Recording and fixing service problems e.g. blockages, sewer flooding incidents, water pressure issues and burst water pipes
- Maintaining our pipes and other assets
- Dealing with emergency events
- Maintaining, monitoring and reporting drinking water quality
- Supporting non-household customers in improving water efficiency
- Metering (including smart metering) – making appointments, meter fitting and repairing. For more detail on non-household meter installations and other business metering services, please see the relevant policy on our website (<https://www.thameswater.co.uk/wholesale/document-library>).
- Collecting, analysing and sharing meter data from smart meter and data loggers to monitor consumption and leakage and enable accurate billing. For more detail on non-household data services, please see the relevant policy on our website (<https://www.thameswater.co.uk/wholesale/document-library>).

- Fitting and maintaining sewer flooding mitigation devices (FLIPS)
- Making payments – for example, but not limited to, for FLIP devices and Guaranteed Service Standards
- Working with farmers in our area on catchment studies to reduce pollution
- Non-household customer communications around streetworks and incidents
- Dealing with claims after service incidents
- Managing enquiries and complaints
- Assessing allowances and abatements
- Carrying out vacant property checks and site visits to check meter and supply details
- Trade effluent registration, monitoring, and reporting
- Demonstrating compliance with our legal obligations to our regulators

More information on the wholesale services we provide to non-households can be found on our website (<https://www.thameswater.co.uk/wholesale>)

Our legal basis for processing personal data for these activities is Article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our **public tasks** as a regulated business in line with the rules and requirements set out by our regulators, such as Ofwat.

### **What type of personal information do we process for this purpose?**

The information processed includes:

- Non-household customer contact and supply address details
- Asset and incident information linked to the service that may identify the non-household customer for example, but not limited to, supply point details, meter details, smart meter data
- Business meter readings, including 15 minute meter readings where smart meters or data loggers have been fitted and are enabled. More information on when a smart meter/logger may be fitted for a business can be found on our website (<https://www.thameswater.co.uk/wholesale/document-library>)
- Information required to process insurance claims, for example, but not limited to, damage to a property due to flooding from our asset
- Information required to produce regulatory reports, for example, reporting number of customer complaints

### **Sharing data with third parties**

To provide our services in an efficient and effective way, your personal data may be provided to us by your retailer and we may share this with our service providers, for example our blockage clearance service provider, and with the Market Operator Services Limited (MOSL) as required, for example, in registering and deregistering supply points.

For further details, please see the list of third parties which is given on our [privacy page](#).

## Annex 1 Credit rating agencies

Each month we share your personal data with a credit rating agency (CRA).

The data we share includes details of your payment behaviour i.e. whether you have paid your bill on time or not. If you pay your bill on time, your credit rating will be positively affected. If you owe us money, the reverse could be true.

In return, each month we receive information from the CRA which includes your payment behaviour with other organisations and other associated data

Information that we give and receive from the CRA includes:

- information about your personal accounts with us and about your accounts with other organisations such as other utility companies
- information about your spouse or others with whom you are jointly liable for credit payments
- where you are the owner, director or partner in a small business, information about your business
- in addition, the CRA may provide us with public information about you such as County Court Judgments, bankruptcies and Electoral Register Information.

The information we receive from credit reference agencies may be used in the following ways:

- to assess your account and decide what payment terms are appropriate
- to verify your identity and prevent fraud
- to manage your personal account and keep your records up to date
- to identify customers who may be at risk of falling into debt so that we can help those who need financial assistance
- to manage our customer debt risk and our debt collection process

Sharing information with CRAs in this way is common practice across the water industry and other utilities.

### Credit Reference Agency Information Notice (CRAIN)

You can find out more about the CRA that we use (Equifax) in its Information Notice on its website ([Equifax's CRAIN](#)). The Information Notice will include details on the CRA's role as a fraud prevention agency, that data it holds and how it uses it, how long it keeps the data, how it shares data and your data protection rights.

## Annex 2 Our customer surveys

We are committed to improving the service we provide to our customers. Essential to this is the need to understand, directly from you, how well we're currently doing. We use this information to create and monitor change. Gathering this feedback also provides us with an opportunity to reconnect with you and 'put things right' should you be less than happy with our service.

We use a variety of methods to gather feedback from you. We may do this ourselves, but we also rely on a small number of partner organisations. We have Data Sharing Agreements in place with these agencies, and all conform to Market Research Society Codes of Conduct. The following agencies undertake the most work for us:

- **Rant & Rave** carries out the bulk of our customer surveys. You may get a text, email or landline voicemail, asking a number of different questions, including your level of satisfaction with the service. This will most often happen after interactions on the phone, website or after a visit from one of our technicians or contractors. Occasionally, and in particular during service failures, we may use Rant & Rave to proactively keep you updated and to help us gather information to best service your needs in the moment. If you are dissatisfied with our service, we may look to reconnect with you to put things right.
- **Accent** works on behalf of our regulator (Ofwat). Every month, Ofwat commissions Accent to interview, by phone, email or face to face, a number of our customers, some of which have recently made contact with us, to ask them for their view on the service we provide. They may also ask some demographic questions to enable Ofwat to understand whether we are treating all our customers fairly. We share the required customer data with Accent to enable these surveys to take place, as required by Ofwat.
- **Populus** is employed by us to conduct a quarterly survey with customers within our area. It recruits and utilises its own online panel of our customers, asking them specifically about whether they'd recommend Thames Water, along with further questions to understand the reasoning behind their scores. The team also undertakes various other forms of research on our behalf, including focus groups, online surveys, telephone, face-to-face and in the street surveying
- Other companies that we partner with include: **BritainThinks, Verve, eftec** and **Community Research**. All companies undertake various forms of research on our behalf, including focus groups, online surveys, telephone, face-to-face and in the street surveying.

You may opt out or stop any service improvement surveying at any point in time – whether that's stopping any further surveys or withdrawing partway through the activity. Other than in the Rant & Rave survey, you will always be asked whether you wish to remain anonymous to Thames Water.

Customer data generated through these routes will only be used for the purpose of gaining a better understanding of the service we provide, how we can improve it and with the intention of helping you during incidents if required. (This is not used for any Marketing activity).