



Thames Water Privacy Notice

Visitors, vehicle users and
publicity

September 2021



Purpose

This section of our Privacy Notice explains how we use personal data

- related to visitors to our website, offices, operational sites and stakeholder events that we arrange; and
- related to use of our vehicles.

Visitors to our website

Analytics

When you visit our website, we use third-party tools to collect information about visitor behaviour patterns. We do this to understand things like the number of visitors to certain pages, how long people spend on pages and where customers are frustrated and drop off. We use this information to continually improve the user experience. This information is only processed in a way that does not directly identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

Cookies

We may obtain information about your use of our website by means of a cookie. A cookie is a piece of text that is stored on your computer by your web browser. Cookies help us to improve our site and to deliver a better and more personalised service.

You can read more about how we use cookies, and how to change your cookies preferences, on our website <https://www.thameswater.co.uk/legal/cookies>

Search engine

Our website search functionality is powered by Coveo. Search queries and results are logged anonymously. We use this data to help us improve our website content. For example, making our search results more relevant.

Purpose and lawful basis for processing

The purpose for implementing the above is to maintain and monitor the performance of our website and to constantly improve the site and the services it offers to our users.

The lawful basis we rely on to process your personal data is either Article 6(1)(a) of the UK GDPR, for example, when we require your consent for the optional cookies we use, or Article 6(1)(f) which allows us to process personal data when it's necessary for our legitimate interests, for example in order to make the site operate more efficiently. Where it's necessary to maintain the

integrity of our IT systems and the continuity of our business, our legal basis of processing would be Article 6(1)(e) for the performance of our **public task**.

Visitors to our offices, sites, attending events and publicity

Visiting our offices and sites

We meet visitors at our offices and sites, including:

- contractors and consultants
- job applicants
- suppliers
- stakeholders

If your visit is planned, we'll send your name and visit information to reception before your visit, to facilitate the signing in process.

Closed-circuit television (CCTV) operates outside the building for security purposes and is recorded.

The purpose for processing this information is for security and safety reasons. The lawful basis we rely on to process your personal data is Article 6(1)(e) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our **public task**.

CCTV recordings are held in line with our Retention Policy and Schedules from the date of recording but may be retained for longer in cases where the recordings are required for Thames Water to establish, make or defend a legal and/or insurance claim.

We have Wi-Fi on site for the use of visitors. We'll provide you with the address and password. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received.

The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is Article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our **legitimate interests**.

Attending events and related publicity

We arrange a number of stakeholder events each year, including our Stakeholder Open Day, and open days for customers of our wholesale services, such as developer services, water retailers and new appointees. To attend one of our events, you will be asked to provide your contact information including your organisation's name and, if offered a place, information about any dietary requirements or access provisions you may need. You will also be informed that we may take photos and videos of stakeholders/customers/members of public for training and publicity purposes. We will advise you that if you don't want to be included in any photography or recording

at an event, to please inform the organiser at the event. You should be able to find their details on a poster displayed at the event.

The lawful basis we rely on for processing your personal data for attending events and taking your photos/videos is your **consent** under Article 6(1)(a) of the UK GDPR. When we collect any information about dietary or access requirements, we also need your **explicit consent** (under Article 9(2)(a)) as this type of information is classed as special category data.

Attending virtual meetings

If a visitor is invited to attend a virtual meeting via Microsoft Teams, they will be advised at the start of the meeting if the meeting is to be recorded. The visitor can either consent to the recording by continuing to attend the meeting or drop out of the meeting.

Photography for publication

Other than at events, we may take your photos, videos and sound recordings to help communicate our activities and services via printed or digital media. These may be published internally within Thames Water e.g. for presentations, training material or externally e.g. as reports, papers, plans.

We will store the material in our internal brand library and it will be deleted when it is no longer needed. To enable the material to be stored and communicated, we may share it with third parties such as those related to the IT systems used in processing the information, design and creative agencies and other professional services e.g. consultants.'

The lawful basis we rely on for processing your personal data for publicity material is your **consent** under Article 6(1)(a) of the UK GDPR. When we collect any special category data, we also need your **explicit consent** (under Article 9(2)(a) of the UK GDPR). To obtain your consent we'll ask you to complete a form that will be provided to you at the relevant time. If there is a minor included in the photography, a different consent form will need to be completed by a guardian or the young person if over 16. You may withdraw your consent/minor's consent at any time, and no further use of the photography can be made. However, we are not required to destroy/retrieve the photography already published.

Vehicles

We have installed dashcams in our operational vehicles to allow us to record events in the case of an accident. The footage may include images of properties, homeowner vehicles, occupants and visitors. We keep the footage for two weeks before it is deleted. The lawful basis we rely on to process your personal data for this purpose is Article 6(1)(e) of the UK GDPR, which allows us to process personal data when it's necessary for the purposes of our **public task**.

We provide vehicle number plate data to the Driver and Vehicle Licensing Agency (DVLA) to investigate possible illegal connections. Our legal basis for processing this data is **legal obligation**

(Article 6(1)(c) of the UK GDPR) as the Water Industry Act 1991 makes illegal connections a criminal offence which we must investigate.