

# AffinityWater

## Priority Services Privacy Notice



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## 1. INTRODUCTION

Our priority service supports thousands of our customers with their additional needs. This privacy notice sets out how Affinity Water Limited ("Affinity Water", "we", "our" or "us") will look after your personal data related to the provision of priority services.

To find out more about how we process personal data day-to-day, please read our Customer Privacy Notice, which can be found here:

[www.affinitywater.co.uk/privacy](http://www.affinitywater.co.uk/privacy)

This privacy notice may change from time to time and, if it does, the up-to-date version will always be available on our Website at [www.affinitywater.co.uk](http://www.affinitywater.co.uk). We will also tell you about any significant changes to this privacy notice. This privacy notice was last updated on 11 August 2023.

## 2. HOW WE COLLECT YOUR PERSONAL DATA

When applying for priority services as an Affinity Water customer, you'll be asked to select the service or need that applies to you so that we can provide you with the support you need. This may require you to provide information on your finances or medical conditions to enable us to properly support you.

We may also take direct registrations from third parties, such as relatives, carers or charities, on your behalf if it's in your interest to do so. If we receive a registration on your behalf, we'll write to you to confirm you've been added. If you wish, you can ask to be removed, and we'll review your request to make sure it's in your best interests.

## 3. PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We collect and process your personal data for the provision of our priority services under the legal basis of 'a task carried out in the public interest'. Where we are required to process your special category data, such as medical conditions, we do so under the conditions of 'substantial public interest', specifically the safeguarding of children and individuals at risk.

We've carefully analysed our data needs against all relevant legislation and make sure we always have a lawful basis for any information we collect.

## 3. HOW WE USE YOUR PERSONAL DATA

Your personal data is used for the following in relation to our priority services:

- To provide support based on what you need to access our services. This will be individual to you, such as sending you a bill in braille.

- To contact you and other customers in priority order during interruptions to your water supply. The priority order will be determined using the needs of each individual that is registered in the interrupted supply area.
- We may also use it to help improve your overall customer experience and to improve how we safeguard individuals at risk.

#### **4. HOW WE MIGHT SHARE YOUR PERSONAL DATA**

We only share personal data held on the Priority Services Register with third parties if we have a fair and lawful basis to do so, such as when:

- It's in our legitimate business interests to do so
- We need to do so to discharge legal obligations and/or public functions
- We need to act to protect children and/or vulnerable adults
- We need to process special category data where there is substantial public interest
- A formal court order has been served upon us
- We are lawfully required to report certain information to the appropriate authorities, e.g. to prevent fraud or a serious crime
- It's needed for emergency planning reasons, such as for protecting the health and safety of others
- We are required to share data by one of our regulators

To ensure the ongoing safeguarding of our customers on our Priority Services Register we may share personal data with distribution network operators.

In addition, in the event of an emergency, we may share your personal data with the following authorities:

- Local Authorities
- Other water and wastewater companies operating in your area
- Police
- Fire and Ambulance Services
- Your energy supplier, such as your Electric or Gas supplier

For further details about who we share customer data with, please view our main Customer Privacy Notice available here [www.affinitywater.co.uk/privacy](http://www.affinitywater.co.uk/privacy).

#### **5. REVIEWING YOUR PERSONAL DATA**

We check in with you every two years to make sure the details we have on file for you are still accurate.

If you'd like to update or remove your details yourself, you can call us or visit our website at any time. You can also make alterations yourself via MyAccount.

If you'd like to remove your details from the Priority Services Register, we may check whether you have any other support in place, and we'll ask you to confirm you no longer wish to benefit from our priority services.

If you are dependent on water for your condition or use a dialysis machine, feeding pump or automated medication, we may advise you to update your details and stay on the register so we can support you in water supply related emergencies. However, you can ask to be removed, and we'll review your request to make sure it's in your best interests.

For further details about your right to access or change the personal data we hold about you, please view our main Customer Privacy Notice at [www.affinitywater.co.uk/privacy](http://www.affinitywater.co.uk/privacy)

## **6. CHANGES IN YOUR CIRCUMSTANCES**

As mentioned above, we'll keep in touch with you every two years. But we understand your circumstances may change more often than that, therefore we ask that you do contact us if there are any changes in your circumstances.

Although we'll check-in with everyone on the Priority Services Register every two years, we'll only contact you if your registration is active at that current time. If we don't hear back from you following a 'check-in', we'll need to remove you from the register. But please don't worry, you can just contact us and we'll help you re-register if you wish.

The timescales for removing you from the Priority Services Register will vary depending on your circumstances as set out below:

### **Six months**

- Temporary - post hospital recovery
- Temporary - life changes
- Temporary - Young adult householder (under 18)

### **Four years**

- Chronic / Serious Illness
- Dementia(s)/Cognitive impairment
- Physical Impairment
- Heart, lung and ventilator
- Nebuliser and Apnoea monitor
- Oxygen concentrator
- Oxygen use
- Stair lift, hoist, electric bed
- Unable to answer door
- Careline / Telecare system
- Mental Health
- Restricted hand movement
- Developmental condition
- Unable to communicate in English
- Medicine Refrigeration
- Families with young children 5 or under
- Additional presence preferred

- Pensionable age (over 80's prioritised in this tier)
- Poor sense of smell/taste
- Speech Impairment
- Hearing impairment (inc. Deaf)

### **Six years**

- Water Dependent
- Dialysis, feeding pump and automated medication
- Medically dependent showering/bathing
- Blind
- Partially sighted
- Doorstep password scheme

## **7. HOW DO WE PROTECT YOUR PERSONAL DATA**

We are committed to maintaining the privacy and security of your personal data through the deployment of physical, technical and organisational security procedures designed to secure your personal data against accidental loss, destruction or damage and unauthorised access, use, alteration or disclosure.

Our customer data is held on secure systems and servers with access controls in place on the Priority Services Register.

We ensure all our staff are trained in data protection so they understand how they can help keep your personal data safe from unauthorised use and access.

Our sites are highly secured with physical access controls strictly implemented.

Your personal data may be transferred to, and stored at, a destination outside the UK. When we transfer and store your personal data outside of the UK we will ensure that it is adequately protected by using appropriate safeguards as further detailed in our Customer Privacy Notice which you can view here [www.affinitywater.co.uk/privacy](http://www.affinitywater.co.uk/privacy).

## **8. FURTHER INFORMATION**

If you have any questions or concerns about how we handle your personal data, you can contact us by:

Post: FAO Data Protection Officer  
Legal, Risk & Compliance  
Affinity Way Ltd  
Tamblin Way  
Hatfield  
Hertfordshire  
AL10 9EZ

Email: [data.protection@affinitywater.co.uk](mailto:data.protection@affinitywater.co.uk)



If you are unsatisfied with our response to any data protection issues you raise with us or our DPO, you have the right to make a complaint to the Information Commissioner's Office ("ICO"). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy and contact details can be found at <https://ico.org.uk/global/contact-us/>.