

Priority Services Privacy Notice

How we take care of you and your personal data

Our priority service supports thousands of our customers with their additional needs whilst continuing to take data protection seriously.

We follow strict UK Data Protection guidelines to safeguard your personal information and we're required to hold a dedicated policy to explain how we'll handle your personal data when you sign up for priority services.

Some of the requirements are to:

- keep up-to-date records of our data processing activities
- complete regular data protection risk assessments
- review our company-wide data protection policy and associated standards at least once a year

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

How we collect your data

When applying for priority services, 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.

We collect and process your personal data for the provision of our priority services under 'substantial public interest'.

'Substantial Public Interest' means that we can take direct registrations from customers, and we can also accept 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.

The data we collect and process about individuals on our Priority Services Register may include 'special category data', such as details of any medical conditions shared with us during registration.

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.

Under the Data Protection Act 2018 the following apply:

- We record and keep your data, including details of any health conditions you may have, so we can tailor our priority services to you under Schedule 1, Part 2 of the Data Protection Act, paragraphs 6 and 18
- We record data for statutory, governmental, and other related purposes under Schedule 1, Part 2, paragraph 6
- We record data for the safeguarding of children and individuals at risk under Schedule 1, Part 2, paragraph 18

Data Security

Data security is a high priority for all of our data processing and we regularly carry out due diligence on the systems we use to store your data. We follow our information security policy, access control policy and associated standards to keep your data secure.

How we use your data

The data you provide us when registering for Priority Services is only used for the following:

- 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. We may also use it to help improve your overall customer experience, this could include offering additional services that would benefit you.
- 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.

How we might share your data

In the event of an emergency, we may share your information with the following authorities:

- Local Authorities
- Police
- Fire and Ambulance Services.
- Your energy supplier, such as your Electric or Gas supplier.

We only share information 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

Reviewing your personal data

We check in with you every two years make sure the details we have on file 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 just 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.

Find out more about your right to access or change the data we have about you at www.affinitywater.co.uk/privacy

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 Service 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 from the register will vary depending on your circumstances:

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

And finally....

This policy will be monitored and updated on a regular basis as and when our processes change or legislation dictates. A copy will always be available to you via our website or by calling our contact centres.

If you have any questions about how we collect, store, access or use your data, or you'd like to see a copy of the data we hold on you, please contact us at data.protection@affinitywater.co.uk

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