

Privacy Policy

Hafren Dyfrdwy

February 2021

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Privacy Policy

Customer Promise

We're making it easier for you to find out how we handle your information.

A new data privacy law was being introduced in the UK in May 2018. As a result, we're publishing our updated Privacy Notice to make it easier for you to find out how we use and protect your information within Hafren Dyfrdwy. We haven't changed the ways we use your personal information, but the notice will provide you with additional details such as:

- Your increased rights in relation to the information we hold about you
- How we keep your personal information secure
- The types of personal information Hafren Dyfrdwy collects about you, and how we collect and use it
- The legal grounds for how we use your information

How to find out more

The Privacy Notice was effective from 1 July 2018, and updated as required and you will be able to view it below or you can ask us to post a copy to you.

We'll keep you up to date

The Privacy Notice makes sure we continue to comply with privacy law and regulation. If we make changes to any of these in the future, we'll let you know.

We're here to help

If you have any questions or would like some help, please contact us on **0330 678 0679**.

You can also view our Code of practice and our Cookie policy. You can view our privacy statement below.

To request access to your data please use our online form or complete the Subject Access Request PDF form

You can also write to: SAR Officer, Severn Trent Water, 2 St John's Street, Coventry, CV1 2LZ

Privacy Notice

1. Who are we?

We are Hafren Dyfrdwy Cyfyngedig. We provide our customers with water services. Hafren Dyfrdwy looks after and is responsible for your data (the Controller). Any reference to "we" or "us" in this notice means Hafren Dyfrdwy.

We are registered in England and Wales under the Companies Acts (Reg. No. 03527628). Our registered office is Packsaddle Wrexham Road, Rhostyllen, Wrexham, Clwyd, LL14 4EH.

We use a number of external third parties who process your personal data on our behalf, these companies are referred to as '**Processors**'. Any Processors we use also have their own legal responsibility for handling your data.

If you have any questions, or want more details about how we use your personal information, you can ask us:

- Email us at: dataprotection@severntrent.co.uk
- Call us on 01978 833200 (+44 1978 833200 from outside the UK)
- Write to us at: FAO Data Protection Officer, 2 St Johns Street, Coventry, CV1 2L

Please note, Hafren Dyfrdwy works with Severn Trent to comply with obligations for UK Data Protection Laws.

2. Personal data that we collect

We collect the following types of personal data from any contact we have with you by telephone, letter, e-mail, facsimile, when visiting your home, Web chat service, Mobile Application, our Contact Us forms and via social media like Twitter and Facebook.

We may also access information about you that is already publicly available.

- Your name, address, email address, telephone number and other contact information;
- Details of payments that you make to us, which may include bank account details as part of any direct debit you agree to set up. For customers paying by credit or debit card, please note we do not store the Credit Verification Value (CVV);
- Information about your billing and payment history, and information we learn from the way you manage your account;
- Information about your credit history with other credit providers which we obtain from Credit Reference Agencies;
- The preferences that you provide to us confirming whether you would like us (and selected third parties) to contact you with information and offers that may be of interest to you;
- Information about your use of our services, including information about your water usage which we collect from meters;
- We also store your responses to surveys should you chose to take part in them;
- If you are the contact at a business customer, we may also collect your employer details, role and work location; and
- Any other information you choose to volunteer to us from time to time.

Some of the information we collect about you may include your special categories of personal data as defined in the UK Data Protection laws (please see section 4 below for more details).

When anyone visits our website, whether they are a customer or not, we also store information about the way you interact with our website through the use of cookies. This helps us to make sure it is the best possible experience for you. Find out more about the way we use cookies: www.hdcymru.co.uk/help-and-contact/cookie-policy/

www.hdcymru.co.uk/help-and-contact/legal/privacy/your-data/ has a list of all the ways that we may use your personal information, and which of the legal reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

3. How we collect your data

We may collect your personal data in a number of ways, for example:

- When you register with us and set up an account to receive our services;
- When you contact us through our websites, by telephone, post, email or through any other means;
- When you complete surveys that we use for research purposes (although you are not obliged to respond to them);
- When you enter a competition or promotion;
- When you make payments to us, through this website or otherwise;
- When you set your preferences for receiving marketing communications from us;
- When you use our services;
- When we receive your personal data from third parties, for example credit reference agencies or fraud prevention organisations; and
- When we collect publically available information about you.

4. Special categories of personal data

We will only request special categories of personal data (health data) from you where we believe it will help us manage your account in the best way for you and to ensure that we can respond to your needs during an incident should one occur. Scenarios in which we may request your special category data are, for example, if you are in default due to illness. We hold specific information in the event of an incident (e.g. if you are on dialysis, haemodialysis) to ensure we can offer additional support and provide services when you need it. We have a process to contact you and confirm your circumstances for any special category data we hold on you (every two years).

By registering on our Priority Services Register you are confirming that you have a need for support either during an incident or to help you manage your account. If your data or circumstances change, please contact us.

We will process this data in line with UK Data Protection laws under the lawful basis for performing public functions in the Public Interest for personal data, and necessary for reasons of Substantial Public Interest (SPI) for special categories of data (health data). This information will be provided to you at the time of our request and we only request this information when necessary to assist you with your account.

By registering with us you can be automatically added to the Priority Services Register of your energy network operator and supplier. The data we share will only be used to provide you with Priority Services.

5. How we use personal data

We use your information in various ways, such as to

- Provide you with the services you want and deal with any queries or complaints you may raise;
- Administer your account, including;
 - Letting you know of any work we may be conducting in your area;
 - Seeking your views on any service we've provided;
 - Dealing with any problems, enquiries, or complaints you may have; and
 - Resolving unpaid bills.
- Let you know about goods or services we feel would be beneficial to you;
- Prevent fraud;
- Keep our records accurate and up to date;
- Create statistical information, market research, analysis and customer profiling to better manage and run our business; and
- Comply with any legal obligations we may have.

We will keep your personal information

We will keep your customer information for as long as you are a customer of Hafren Dyfrdwy. After you stop being a customer, we may keep your data for up to 15 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us. We may keep your data for longer than 15 years if we cannot delete it for legal, regulatory or technical reasons.

We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

6. Reasons we share personal data

As part of normal operations, we engage third party contractors to provide us with services, for example, if you call us to inform us about a leak, we may use contractors to investigate the issue. Where we use third party contractors, we may need to give your personal data to them, for example, to investigate the issue and inform you of the outcome.

In respect of business customers, the market opened on 1 April 2017 for water supplies to business users, enabling businesses to switch providers and is run by Market Operator Services Limited ("MOSL"). In order to facilitate this,

we may share details of contacts at our business customers with MOSL and third party service providers where required. For more information on MOSL please see www.mosl.co.uk

We share some contact information with HomeServe Membership Limited, who have been carefully selected to provide access to affinity insurance products for our customers, which can help in the event of water related problems.

We may also share your personal data with other third parties because we are under a legal, statutory or other obligation to do so or because we believe that sharing your personal data will help us to manage your account in the best way possible for you.

We may share and receive data from third party payment companies to help you manage your account.

We share data with the water industry regulator, Ofwat as part of our statutory requirements as a water undertaker. This helps us measure and improve our service to you, and your customer experience. From time to time, Ofwat, or a third party acting on their behalf, may contact you directly to take part in a customer experience survey. You may be contacted about the service you received from Severn Trent Water and asked to score our performance. Please note, this is not a marketing call.

7. Who we share personal data with

We may share your personal data:

- our employees, agents and/or professional advisors;
- other companies within the Severn Trent Plc Group, and with successors-in-title to our business;
- other third party contractors who provide services to us which require the processing of personal data;
- third party payment providers who process payments made over our website;
- relevant authorities and third parties including Department for Food, the Environment and Rural Affairs (Defra), and the water industry regulator, Ofwat;
- relevant authorities in order to prevent fraud and other criminal offences;
- social services, charities and other third parties in order help manage your account in the best way for you and help you get any support you might need;
- credit reference agencies (to find out more see section 8 below);
- external agencies like the police, fire service, or local councils in the event of an emergency situation, such as under the Civil Contingencies Act 2004; and
- carefully selected partners, to introduce you to water related news, goods and services (by post, phone, email, SMS) that we think you'll find interesting.

8. Credit reference agencies

Like many other utilities, we share your personal data with, and receive your personal data from, Credit Reference Agencies (CRAs). This help us maintain up-to-date customer records, fraud prevention, identify potential customers falling into debt, and allow us to help customers at earlier stages through assistance and education. This helps us manage the debt levels and keeps prices low for all of our customers.

If you pay you bill on time, sharing your data will also positively impact your credit rating.

We will share your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time.

We will share your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time.

The CRAs may give this information to other organisations that want to check credit status. If you tell us that you have a spouse or financial associate living at the same property, we will link your records together.

Credit Rating Agencies will also link your records together and these links will remain on your file and theirs until either you or your partner successfully applies for a disassociation with the CRAs to break that link.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Information notices (CRAIN) for the two Credit Reference Agencies we use:

- TransUnion: <https://www.transunion.co.uk/legal/crain-retention>
- Equifax: <https://www.equifax.co.uk/crain>

SHARING DATA WITH CREDIT REFERENCE AGENCIES <https://www.stwater.co.uk/help-and-contact/legal/sharing-data-with-credit-reference-agencies/>

9. Monitoring and recording of calls

We record all calls to our contact centres, and may monitor calls in order to keep a record of the discussion, to provide you with the highest quality of service, for training, to ensure compliance with our policies and procedures, for security purposes and for any lawful purpose.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents and advisers who we use to help run your accounts and services.

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.
Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this on the European Commission Justice website
https://ec.europa.eu/info/law/law-topic/data-protection_en

Sometimes we will need to share your personal data with third party data processors in countries that are outside of the European Economic Area, for example: we have a Third Party supplier is based in India. We put adequate safeguards in place to ensure that your data receives the same level of protection as if it were being processed inside the EEA.

10. Your rights

By providing us with personal data, and reading this policy you are aware of how we are using your data for the purposes mentioned. If you would like to change the way we are able to contact you, you can simply email us with your account details and your request.

You have the following rights under the UK Data Protection Laws. These rights include:

(i) Right to Access your Personal Data

You can request a copy of the information we hold about you. There is no charge for this. You can do this via our online form or by completing this Subject Access Request PDF form.

You can also write to: SAR Officer, Severn Trent Water, 2 St John's Street, Coventry, CV1 2LZ

Or Email us: customerSAR@severntrent.co.uk

Our process of compiling a Subject Access Request does not include a review of any ongoing issues, and does not form part of Hafren Dyfrdwy complaints process. Telephone calls to and from Hafren Dyfrdwy are recorded for training and quality monitoring purposes only, and copies or transcripts of calls will not be provided. Hafren Dyfrdwy is not covered by the Freedom of Information Act 2000. (This legislation provides access to public information held by public authorities such as government departments, local authorities, and the NHS.)

(ii) Right to Rectification

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

(iii) Right to Object

You can request that your personal data is not processed for specific purposes such as water marketing.

We're keen to promote efficient water use and we may send you offers or make you aware of products that help with this. Also, from time to time we may tell you about other offers we think may interest you.

We may do this, or we may share your information with carefully selected partners who offer services or products that we think you may be interested in. Every time we contact you about such offers we will give you the opportunity not to hear about anymore.

If you don't want to receive such offers at all, please let us know – you can email us (customercare@hdcymru.co.uk) or call us on 0330 678 0679.

(iv) Right to be Informed

You can ask for details of how we process your personal data, as covered by this Privacy Notice

(v) Right of Erasure

You can request the deletion or removal of personal data where there is no reason for its continued processing. This right is also known as the "Right to be Forgotten".

(vi) Right to Restrict Processing

You can request that no further processing of the personal data we have previously collected occurs.

Please be aware that there may be circumstances when we are unable to complete your request, most likely because we could not provide you with water or billing services. If this is ever the case, we will inform you of the reason and provide details of how you can register a complaint with the Information Commissioners Office (<https://ico.org.uk/>) if you believe we have got this wrong.

Automated decision making and profiling – please note we do not currently conduct any automated decision making, including profiling, as defined by UK Data Protection laws.

11. Security

We will take appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to personal data.

All customer personal data is held in secure systems with controlled access and subject to cyber security measures. We also apply strict physical security at all our sites.

All employees receive cyber security and data protection training.

We will ensure that the personal information that you provide us via this website is held on secure servers.

Where we transfer information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data and keeping it secure.

12. Contact us

If you have any further questions about the way we manage your data you can email or call us on 0330 678 0679.

Complaints

Please let us know if you are unhappy with how we have used your personal information. You can contact our Data Protection Officer at dataprotection@severntrent.co.uk

You also have the right to complain to the Information Commissioner's Office. Find out on their website (<https://ico.org.uk/>) how to report a concern.

To learn more about staying safe online, visit www.internetmatters.org and www.getsafeonline.org

Your data

We collect information from you when you visit our website, contact us by telephone or email or if you receive a communication from us.

Category of personal data	Examples of your personal data
Contact information	Name, Address, Email Address, Telephone Number
Transaction information	Contact information, date of birth, billing details, payment details, any communications, complaints, income details, expenditure details, affordability information, credit rating, operational investigations, repairs, interruption to supply, planned maintenance, meter details (including meter serial numbers and water usage), Vehicle registration for ANPR systems on visitor sites.
Legal information	Fraud checks or flags raised about your transactions, payment refusals, complaints, CCJ's.
Preference information	Your marketing preferences, your account settings including any default preferences, any preferences we have observed, such as the types of services that interest you, or the areas of our website that you visit.
Communications	Communications we may have with you, whether relating to a transaction or not. Please note that we record calls to our Contact Centre team.
Voluntary information	Any voluntary information you provide us with, such as responses to customer campaigns and surveys
Observed information	Details of your online browsing activities on our website, such as the pages or areas of our website that you visit, or which link has brought you to our website from our email communications or other websites. Any health conditions you may want to inform us of to help us manage your account. This information may be identifiable to you because you are logged in to your account, or because we have collected details of your IP address or the device that you have used to access the website. This will also collect the geographic region which your device reports to us that you are located in.

We use the data we collect about you for various purposes. UK Data Protection laws sets out specific “lawful bases” for processing personal data. The table below sets out under which basis we process different information about you, and explains the purpose of that processing. It also sets out the specific rights you have in respect of that processing, which may depend on the basis we process it for.

Lawful basis and purpose	What personal data do we use?	Specific rights you may request
<p>Complying with legal obligations:</p> <p>To meet our obligations under: Water Industry Act 1991 Water Industry Act 1999 Water Act 2014 Instrument of Appointment (issued by the Secretary of State for the Environment) Water Supply (Water Fittings) Regulations 1999 Water Supply (Water Quality) Regulations 2016 Water Resources Act 1991 Environment Act 1995</p> <p>To confirm your identity, to keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws.</p> <p>To provide information to law enforcement agencies or other authorities where we are required to do so.</p> <p>To manage shareholder transactions.</p>	<p>Legal information, Transaction information, Communications (where relevant), Preference information (cookie preferences only), Contact information</p>	<p>To access the personal data we hold about you</p> <p>To correct the personal data we hold about you</p>
<p>Our legitimate interests:</p> <p>To manage customer accounts, including keeping customer records, customer care, HomeServe and other interactions including compensation and GSS, for our internal business administration, and to protect customers and our business from fraud to minimise the risk of false details being used, and abuse by fraudsters. This is necessary in order for us to operate efficiently, deal with any issues which may arise and to protect ourselves against any future legal claims and ourselves and others against fraudulent transactions.</p>	<p>Transaction information, Legal information, Communications, Preference information</p>	<p>To restrict our processing to storing your personal data, except when using it for purposes of legal advice or action, or to protect another individual.</p>
<p>To provide you with operational and service requirements based on health circumstances or financial circumstances, where applicable.</p>	<p>Contact information, Transaction information, Legal information Communications</p>	<p>To restrict our processing to storing your personal data, except when using it for purposes of legal advice or action, or to protect another individual.</p>
<p>To manage any surveys or other water efficiency promotions that you have chosen to participate in. Where possible we will use pseudonymised data for these purposes.</p>	<p>Contact information, Preference information, Communications, Voluntary information</p>	<p>To object to our use of your personal data for the purposes stated.</p>

<p>Perform a task in the public interest:</p> <p>For performing public functions in the Public Interest for personal data, and necessary for reasons of Substantial Public Interest (SPI) for special categories of data (health data)</p> <p>To provide you with operational and service requirements based on health circumstances or financial circumstances, where applicable.</p>	<p>Contact information, Voluntary information</p>	<p>To access the personal data we hold about you</p> <p>To correct the personal data we hold about you</p> <p>To opt out of the additional services provided if your circumstances change</p>
<p>Consent:</p> <p>To send you direct marketing for non-water related products and services.</p>	<p>Contact information</p> <p>Voluntary information</p>	<p>To withdraw your consent.</p> <p>You can withdraw your consent to receive direct marketing from us by contacting us.</p>