

# AffinityWater

## Smart Metering Privacy Notice





## Smart Metering Privacy Notice

This Privacy Notice will help you understand how Affinity Water Limited ("Affinity Water", "We", "Our" or "Us") use your personal data when you have a Smart meter installed. This notice should be read in conjunction with our [Customer Privacy Notice](#).

We communicate with our customers before a Smart meter is installed. However, if you are unsure whether you have a Smart meter, please call us on 0345 357 2402.

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. We will also tell you about any significant changes to our privacy notice by email or in other communications from us. This privacy notice was issued on 22<sup>nd</sup> October 2024.

### 1. ABOUT AFFINITY WATER

Affinity Water Limited is a company registered in England and Wales under company number 02546950 whose registered office is at Tamblin Way, Hatfield, Hertfordshire AL10 9EZ.

We are registered as a data controller with the ICO and our registration number is Z8926206.

We have a data protection officer ("DPO"). You can contact our DPO by:

- emailing [data.protection@affinitywater.co.uk](mailto:data.protection@affinitywater.co.uk); or
- writing to: Data Protection Officer, Affinity Water Limited, Tamblin Way, Hatfield, Hertfordshire AL10 9EZ.

### 2. SMART METERING

A Smart meter, also referred to as Advanced Metering Infrastructure (AMI) meter, is a device that efficiently measures the volume of water into a property and remotely transmits the readings back to us over a secure, wireless network. Our Smart meters collect hourly consumption data 24/7, and additional 15-minute data between 2am and 4am to help detect leaks. These meter readings are transferred to us every 24 hours allowing us to accurately measure water consumption in near-real time.

The roll out of Smart metering is being phased out across our region, with a mix of replacement upgrades and new installations. As we are considered a water stressed region, some installations will be mandatory, whereas others will be on an opt-in basis. All new developments will have Smart meters installed.

### 3. PERSONAL DATA

Personal data is any information that relates to an identified or identifiable living individual. This means that the individual is directly identifiable from that information or could be indirectly identified from that information in combination with other information. Therefore, water consumption data and other information related to your Smart meter is considered personal data.

### 4. SMART METER DATA WE COLLECT ABOUT YOU

This section informs you of what information we collect about you when you have a

Smart meter installed:

- Water consumption in litres on a 15 minute / hourly basis (depending on time of day / night)
- Water consumption over a six-monthly period for billing purposes
- Time and date stamp of consumption data
- Meter type
- Meter serial number
- Meter location
- Alarm information such as leak detection, tampering, backflow and continuous flow

We will combine the above information with personal data we already process about you, predominantly your name, address, telephone number, email address, property reference, customer reference number, billing information and locality demographics.

### Special Category Data

The data we collect and use from your Smart meter is not classified as special category data. For more information on the special category data we process, refer to our [Customer Privacy Notice](#).

## 5. PURPOSES AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We must have a legal basis for processing your personal data.

Purpose	Legal basis for processing
<b>Support leakage detection</b> within the property or on the supply pipe (depending on if the meter is installed internally or externally).	Public Interest
<b>Improved accuracy of billing</b> based on frequent, up-to-date meter reads.	Legal Obligation
<b>Improved management of water supply</b> to meet supply and demand. Smart meters will allow us to compare the water being supplied into the network against actual consumption data in a defined area to better identify and fix leaks and bursts.	Legal Obligation
<b>Reduce per capita consumption (PCC)</b> by supporting customer behaviour change and providing water saving tips and devices.	Public Interest
<b>Reduce meter reading costs</b> by automatically taking readings over a wireless	Legitimate Interest



Purpose	Legal basis for processing
network, avoiding the need to send a meter reader to the property.	
<b>Improved customer service</b> by providing you with accurate hourly usage information, usage comparisons, respond better to usage queries, leak reports and negate the need for customers to provide meter readings to us. We are also better able to manage property moves and void properties.	Legitimate Interest
<b>Improved asset management</b> through better identification of meter failures and quicker repairs.	Public Interest
<b>Improve regulatory reporting</b> on daily consumption, leakage and bursts.	Legitimate Interest
<b>Research and Analytics</b> on an aggregated and anonymous basis to identify water consumption trends and help us better respond in the future to changing demands (for example population growth and climate change).	Legitimate Interest
<b>Customer Surveys</b> to capture feedback on communications, installations, and use of your smart meter, to ensure we are meeting our customers' expectations and needs.	Legitimate Interest

## 6. WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA

Personal data will only be handled by our trained employees who have a legitimate business need to access your personal data for the purposes set out in this privacy notice. Due to the accuracy and granularity of hourly and 15-minute meter reads, we limit who has access to this information. For example, we only make hourly reads available to our advisors and operators who need the information to support customers with their queries, or to perform other tasks in relation to smart metering.

We'll also be updating My Account so you'll soon be able to see your hourly usage there. To register for My Account click here: <https://www.affinitywater.co.uk/aboutmyaccount>. However, for now, if you request access to your meter reads, we can provide it on a case by case basis by contacting 0345 357 2402.

## **7. WHO ELSE WE MIGHT SHARE YOUR PERSONAL DATA WITH**

We may share your personal data from your Smart meter with the following:

Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them to perform services on our behalf, such as:

- Smart Meter network provider
- Smart meter delivery/installation partner
- Leak detection and repair
- Customer service and billing
- Processing payment transactions
- The offering of home water efficiency checks
- Sending customer communications
- Collecting debts owed to Affinity Water
- Responding to service disruptions and emergencies
- Customer translation services
- Researching and analysing customer water consumption
- IT and/or network support

We may disclose your Smart meter data to the police, Department for Work and Pensions, HMRC, UK Visas and Immigration, fraud prevention and investigation agencies and any other law enforcement agency to the extent necessary for purposes including preventing, investigating, detecting, and prosecuting criminal offences, or validating a claim.

We may share your personal data with the following third parties where we are legally required to do so or to assist us with administering the provision of our services to you:

- Our regulators and industry bodies including OFWAT, the Consumer Council for Water, the Drinking Water Inspectorate, MOSL, the Environment Agency and local flood authorities.
- Providers of wastewater services, which may include Southern Water, Anglian Water and Thames Water.
- Other water companies for whom we undertake meter readings on their behalf.
- Housing associations and local authorities with whom we work collaboratively with in the provision of certain services to you such as water saving devices.

Our partners, suppliers and sub-contractors have access to the personal data needed to perform their functions but may not use it for other purposes.

We may also pass aggregated data (such as anonymised statistical or demographic data) on water consumption and leakage to third parties, but this will not include information that can be used to identify you personally.

If a business transfer or change of business ownership takes place or is envisaged, we may transfer your personal data to the new owner (or a prospective new owner). If this happens, you will be informed of this transfer.



## **8. AUTOMATIC DECISION MAKING**

We will use automatic decision making to help us make decisions without human involvement. For example, Smart meters will tell us if a customer is likely to have a leak. We will also use Smart meter data to conduct automatic decision making, including profiling (analysis of aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them), in other ways, such as:

- Understand customer usage and tailor our communications and behaviour change initiatives accordingly.
- Provide consumption comparisons on water usage to those in similar properties or postcodes to help you understand your usage and reduce your consumption.
- Predict water usage on an individual or aggregated basis to help manage changing demands, for example those caused by climate change or emergencies.

You have the right not to be subject to a decision based solely on automated processing (no human intervention), where the decision affects your legal status or rights or where the decision has a similarly significant effect. This type of processing is permitted where the decision is necessary for entry into or performance of a contract with you; is authorised by law; or based on your explicit consent.

## **9. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE UK**

Your personal data may be transferred to, and stored at, a destination outside the UK, such as the EEA, the USA, India and South Africa. 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 below.

Staff operating outside the UK who work for us, or one of our suppliers, may process your personal data. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services.

Where your personal data is transferred to a recipient outside the UK to a country not recognised by the UK as providing an adequate level of protection for personal data, we will ensure the transfer shall be covered by the following:

- An International Data Transfer Agreement; and
- An international data transfer risk assessment of the receiving country; or
- In accordance with one of the derogations set out in the UK data protection legislation.

## **10. HOW LONG WE KEEP YOUR SMART METER DATA**

We will keep your Smart meter data for no longer than is necessary for the purposes for which it was obtained. For full details of the criteria we apply to retention of personal data, please refer to our [Customer Privacy Notice](#).



## 11. YOUR DATA RIGHTS

The legal rights you have in relation to your personal data are summarised below:

- **Right to be informed** - You have the right to be informed about the collection and use of your personal data, as covered by this privacy notice.
- **Right of access** – You have the right to access and receive a copy of your personal data, and other supplementary information (subject to a limited number of exemptions). You can make a request at [www.affinitywater.co.uk/subject-access-request](http://www.affinitywater.co.uk/subject-access-request).
- **Right to rectification** – You have the right to have inaccurate personal data rectified, and incomplete personal data completed.
- **Right to erasure** – You have the right to request erasure of your personal data in certain circumstances.
- **Right to restrict processing** – You have the right to request restriction or suppression of your personal data.
- **Right to data portability** – Where we are processing your personal data based on your consent or for the performance of a contract you may request that we transfer your personal data to another organisation in a structured, commonly used machine-readable format. This only applies to personal data provided to us by you.
- **Right to object** – The right to request we stop processing your personal data applies when we process your personal data based on a task carried out in the public interest or for our legitimate interests (or those of a third party). However, in these circumstances we may refuse to comply with your request if we can justify compelling legitimate grounds, or where the processing is for establishment, exercise or defense of legal claims.

You can exercise your rights free of charge. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up and improve our response to you.

We will comply with your request within one calendar month (from the time Affinity Water receives your request, or upon receipt of any additional information we have requested from you). Occasionally we may require more time to respond to your request if your request is complex. We will notify you within one month to inform you that we require additional time to comply with your request.

In exceptional circumstances where your request is manifestly unfounded or excessive, we may charge you for your request, or refuse to comply with your request. We will always inform you of the reasons for not being able to comply with

your request.

## **12. 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  
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. Their contact details can be found at <https://ico.org.uk/global/contact-us/>.