

## Privacy Policy

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### 1. Introduction

- 1.1 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we may disclose it to and your rights and choices in relation to your personal information.
- 1.2 In this Privacy Policy references to:
  - 1.2.1 we, us or our means Water Plus Group Limited (Company Number 10012579), Water Plus Limited (Company Number 04141390) and Water Plus Select Limited (Company Number 03511659). Registered Office: Two Smithfield, Leonard Coates Way, Stoke-on-Trent, ST1 4FD;
  - 1.2.2 you or your means the person accessing and using our Website (as defined below) or a customer of our Services;
  - 1.2.3 Website means [www.water-plus.co.uk](http://www.water-plus.co.uk);
  - 1.2.4 personal information is information that is about you and which identifies you;
  - 1.2.5 Group means Water Plus Group Limited and Water Plus Select Limited;
  - 1.2.6 the Services means the water and sewage retail services and any other related services that we may provide to you; and
  - 1.2.7 Customer Portal means the online customer platform which allows you to manage your account online.

### 2. Who is responsible for the personal information that we collect?

- 2.1 We are the controller for the purpose of data protection law, in respect of your personal information that is collected and used through your use of our Website and our Services.
- 2.2 If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by email at [service@water-plus.co.uk](mailto:service@water-plus.co.uk).

### 3. What personal information do we hold about you?

- 3.1 The personal information we collect includes:
  - 3.1.1 Information that you provide to us
    - (a) your name and contact information (including email, telephone and postal address);
    - (b) your marketing and communication preferences;
    - (c) your payment card number (credit or debit card), bank account number, or other financial account number and account details;
    - (d) consumption data relating to your use of our Services (to the extent this constitutes personal information);

- (e) recordings of telephone calls (voice and video) with our representatives and customer service team (this may include biometric data, but will not be used for the purpose of identifying any individual); and
- (f) account log-in information and password.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) via the and Customer Portal;
- (c) when you, for example, complete our forms (including the Contact Us and Get a Quote forms on our Website); and
- (d) via our social media pages, other social media content, tools and applications.

#### 3.1.2 Information we collect from you

- (a) As you interact with our Website and Customer Portal, we may automatically collect personal data by using cookies, server logs and other similar technologies. Cookies are pieces of information stored directly on the device you are using to access our Website. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using our Website and the pages visited; and
- (b) consumption data relating to your use of our Services via our Automated Meter Reading devices (to the extent this constitutes personal information).

#### 3.1.3 Information we receive from other sources

- (a) credit reference agencies such as CreditSafe which includes the receipt of your credit history, credit rating, details of any County Court Judgments, bankruptcy and insolvency data and Electoral Roll information;
- (b) the market operators of the non-household retail water market, Market Operator Services Ltd (MOSL) and the Water Industry Commission Scotland (WICS) which includes the receipt of your name, business address, consumption data and supply point identifier (to the extent that such consumption data and supply point identifier constitutes personal data);
- (c) business information providers such as Bureau van Dijk which includes the receipt of your name, business email address, company address and business telephone number;
- (d) lead generation providers such as Lead Forensics which includes the receipt of your name, job title and business email address; and
- (e) Companies House and other publicly available sources.

## 4. Information about third parties

In the course of your dealings with us you may provide us with personal information relating to third parties. For example, we may collect personal information about consultants acting on your behalf. This might include the name and contact details of a broker.

4.1 We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you confirm that you have the permission of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.

## 5. How do we use the personal information we collect about you?

5.1 Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out in the table below the main legal basis on which we use your personal information. Depending on the circumstances, more than one legal basis may apply.

| Purpose   | Legal Basis  |
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| To communicate with you and other individuals about our Services and to respond to any queries that you submit to us.         | The legal basis will fall into one of the following three categories, depending on the communication and the purpose for which it was sent: <ul style="list-style-type: none"> <li>our legitimate business interests in order for us to manage our relationship with you;</li> <li>performance of a contract between you and us; and/or</li> <li>compliance with legal obligations to which we are subject.</li> </ul> |
| To provide you with a quote for our Services.   | The processing is necessary in order to take steps at your request prior to entering into a contract.  |
| To carry out our obligations arising from any contracts entered into between you and us and to provide you with our Services. | This processing is necessary for the performance of our contractual obligations between you and us.  |
| For debt recovery purposes.   | This processing is necessary for the performance of our contractual obligations between you and us.  |
| For credit checking.  | This processing is necessary for our legitimate business interests in order for us to undertake customer due diligence and to assess the credit worthiness of our customers.   |
| To monitor and record calls.  | This processing is necessary for our legitimate business interest for staff training and quality purposes.   |

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| To notify you about changes to our Website.  | This processing is necessary for our legitimate business interests in order for us to manage our relationship with you, and to keep you updated as to changes to our Website.   |
| To manage complaints, feedback and queries.  | <p>Depending on the context, this processing will be necessary for:</p> <ul style="list-style-type: none"> <li>• the performance of our contractual obligations between you and us;</li> <li>• us to comply with our legal and</li> </ul>   |
|  | <p>regulatory obligations; and/or</p> <ul style="list-style-type: none"> <li>• our legitimate business interests in order for us to manage our relationship with you and to enable us to improve and develop our business operations and the Services.</li> </ul>   |
| To provide you with information about the products and services that we offer.                   | Depending on the method of communication, this processing may be carried out with your consent or in accordance with our legitimate business interests to process your information for direct marketing purposes.   |
| To comply with any legal or regulatory obligations (including in connection with a court order). | This processing is necessary for us to comply with our legal and regulatory obligations.  |
| To prevent and detect fraud, financial crime and anti-money laundering.                          | <p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>• the processing is necessary for us to comply with our legal and regulatory obligations; or</li> <li>• the processing is necessary for our legitimate business interests in order to conduct and manage our business.</li> </ul> |

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| <p>To enforce or apply the contracts concerning you (including contracts between you and us).</p>   | <p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>• the processing is necessary for our legitimate business interests in order to conduct and manage our business;</li> <li>• for the performance of our contractual obligations between you and us; or</li> <li>• in connection with legal proceedings (i.e. the establishment, exercise or defence of legal claims).</li> </ul> |
| <p>To administer and protect our business, this Website and Customer Portal such as: troubleshooting</p> <ul style="list-style-type: none"> <li>• data analysis</li> <li>• testing</li> <li>• system maintenance</li> <li>• support</li> <li>• reporting and hosting of data</li> </ul> <p>in order for the efficient running of the Website and Customer Portal, provision of administration and IT services, network security.</p>  | <p>Necessary for our legitimate interests of Website and Customer Portal security</p>   |
| <p>Providing business insight into how members use the Website and Customer Portal. We do this by:</p> <ul style="list-style-type: none"> <li>• [delivering relevant Website content and advertisements to you and by measuring or understanding the effectiveness of the advertising we serve to you]</li> <li>• using data analytics</li> <li>• making suggestions to you about goods or services that may be of interest to you</li> </ul> <p>for the use of web analytics, profiling and personalisation in order to study how customers use our services, to develop them, to grow our business and to ensure our marketing strategy is as relevant and accurate as possible</p> | <p>Necessary for our legitimate interests in order to produce the most effective Website and Customer Portal and customer experience.</p>   |

5.2 As set out above, we may be required to process your personal information to comply with our legal requirements, to enable us to fulfil the terms of any contract that we have with or in preparation of us entering into a contract with you. Depending on the circumstances, if you do not provide the relevant personal information to us or provide incomplete/incorrect information to us, we may not be able to provide the relevant Services to you.

## 6. Who may we disclose your personal information to?

6.1 You agree that we may share your personal information with:

- 6.1.1 our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you. For example, we may engage third party service providers to process card payments, to carry out meter reading services, for IT services and invoicing purposes;
- 6.1.2 other companies and entities within our Group;
- 6.1.3 as part of the Open Water Programme (which is designed to give nonhousehold customers a choice of water supplier), we will share your business name, business and personal address, consumption data and supply point identifier with MOSL and WICS, the market operators of the non-household retail water market to primarily enable customers to switch providers. You can find out more about how MOSL processes your personal information and who your personal information may be shared with here;
- 6.1.4 lead generation providers such as Lead Forensics, who collects your IP address when you visit our Website;
- 6.1.5 credit reference agencies such as CreditSafe;
- 6.1.6 debt collection agencies;
- 6.1.7 other professional advisers (including accountants, lawyers and insurers) that assist us in carrying out our business activities;
- 6.1.8 police and other law enforcement agencies in connection with the prevention and detection of crime;
- 6.1.9 other external agencies and organisations (including the National Crime Agency and Serious Fraud Office) for the purpose of preventing and detecting fraud (including fraudulent transactions), money laundering and criminal activity;
- 6.1.10 HMRC; and
- 6.1.11 any other third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our customers, employees or other third parties.

6.2 We may also disclose your personal information to other third parties, for example:

- 6.2.1 in the event that we sell or buy any business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets;

- 6.2.2 if all or part our assets are acquired by or assigned to a third party (including as part of any financial securitisation or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
- 6.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you (including agreements between you and us).

## 7. Where will we transfer your personal information?

- 7.1 We will process your personal information both within and outside the European Economic Area (EEA). Where we transfer personal data outside of the EEA, we will implement appropriate and suitable safeguards to ensure that such personal information will be protected as required by applicable data protection law.
- 7.2 These measures generally include either:
  - 7.2.1 transferring personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission under Article 45(1) of the General Data Protection Regulation; or
  - 7.2.2 transferring personal information where the recipient has agreed to a European Commission approved data transfer agreement in the form of the standard contractual clauses under Article 46(2) of the General Data Protection Regulation.
- 7.3 Please contact us by email at [service@water-plus.co.uk](mailto:service@water-plus.co.uk), if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

## 8. How long will we keep your personal information

- 8.1 We will keep your personal information for a period of up to 7 years after we close your account with us, subject to the following exceptions:
  - 8.1.1 if you have opted out of receiving direct marketing from us, we will keep a record of such opt-out; and
  - 8.1.2 will keep your payment details for as long as you remain a customer and until we close your account; and
  - 8.1.3 will keep your MyAccount login details for as long as you remain a customer and until 24 months after we close your account; and
  - 8.1.4 will only retain call recordings for a period of 13 months following the call.
- 8.2 Please note that all of the above retention periods may be extended where we need to preserve and use personal information for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal information for as long as is necessary to deal with the legal proceedings.

## 9. Your rights

- 9.1 You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights.

- 9.2 If you wish to exercise any of the below rights, please can contact us by email at [service@water-plus.co.uk](mailto:service@water-plus.co.uk).
- 9.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 9.4 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 our response.
- 9.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

| Summary of your rights                               |   |
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| <b>Right of access to your personal information</b>  | <p>You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.</p> <p>Any access request is free of charge. We may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require).</p>   |
| <b>Right to rectify your personal information</b>    | <p>You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.</p>  |
| <b>Right to erasure of your personal information</b> | <p>You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.</p> |



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| <p><b>Right to restrict the use of your personal information</b></p>                    | <p>You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.</p> |
| <p><b>Right to data portability</b></p>   | <p>You have the right to obtain your personal information that you provided to us in a structured, commonly used and machine readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of the personal information that you provided is based on your consent or for the performance of a contract with you, and when the use of your personal information is carried out by automated (i.e. electronic) means.</p>  |
| <p><b>Right to object to the use of your personal information</b></p>                   | <p>You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party) including for profiling; and (ii) if you object to the use of your personal information for direct marketing purposes, which includes profiling</p>  |
| <p><b>Right to object to decision which is based solely on automated processing</b></p> | <p>You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing without human intervention.</p>  |
| <p><b>Right to withdraw consent</b></p>   | <p>You have the right to withdraw your consent at any time where we rely on consent to use your personal information.</p>   |

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| <p><b>Right to complain to the relevant data protection authority</b></p> | <p>You have the right to complain to the relevant data protection authority, which is in the case of us, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.</p> |
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## 10. Third party links

10.1 The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your personal information. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

## 11. Changes to our Privacy Policy

Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, actively communicated on our Website or by email. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

## 12. Cookie Policy

Our Website use cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

Last updated January 2023