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Owner: Head of Corporate Data & Compliance

Approval: DPSG March 2018

Review Date: February 2019

CORPORATE PRIVACY NOTICE

REASON FOR NOTICE

This notice explains how we collect your Personal Data – meaning any information relating to an identifiable person (“Personal Data”), why we need it, what we do with it and how you can contact us about it.

We are a public corporation created by the Water Industry (Scotland) Act (2002), which provides water and waste water services in Scotland. There are a number of other trading companies that form part of Scottish Water’s group of companies.

This notice applies to:

- our household customers to whom we provide services, or individuals who contact us, including making enquiries with us
- business customers who can be identified by their business name, including sole traders, who are involved with us
- licensed providers and business customers whose employees’ Personal Data is processed by us in relation to their supply of water and sewerage services including our regulatory enforcement activity.

Local authorities collect revenue from our domestic unmetered customers, on our behalf. We aim to ensure each local authority also protects your Personal Data during the collection activities they carry out on our behalf.

We collect and use Personal Data across the areas set out in this document. You will also receive information about Personal Data collected at the start of certain processes, e.g., contacting our call centre.

We will only disclose Personal Data to third parties who have the appropriate data protection safeguards in place, in order to perform our necessary functions, as outlined in this document, or where required to by law.

WHEN WE COLLECT YOUR PERSONAL DATA

We collect Personal Data about you in a number of ways, such as:

- when you set up your web page account
- when you contact us for any reason
- if you complete an online form or survey
- when you are set up for billing directly by Scottish Water
- when a business customer premises is registered in the retail market as a new connection to the network or as a gap site
- when a business customer’s information is passed to us by a licensed provider or by the Central Market Agency
- when we interact with a business customer for regulatory purposes, such as water quality sampling, byelaws inspections and trade effluent regulation.

Sensitive data may also be collected when you contact us and provide this Personal Data, e.g., make us aware of a vulnerable household.

Local authorities collecting domestic unmetered charges collect Personal Data about you on our behalf.



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OUR BUSINESS ACTIVITIES

We provide services to 2.5 million households and 153,000 business premises across Scotland. Our activities include:

Our customers, services and contacts

- operating and maintaining water and wastewater assets, including reservoirs, water and wastewater treatment works, water and wastewater pipes
- delivering sampling and analysis to ensure that we comply with our regulatory obligations and that Public Health and the environment is fully protected, including water byelaws and trade effluent regulation
- managing contacts which come through our contact centres via telephone, social media and email
- enabling field response for problems, such as burst or leaking pipes, blocked drains, water quality issues, water pressure issues or odours
- obtaining feedback and insights regarding needs, expectations and perceptions to plan for the future and further improve our services
- monitoring our assets and providing an emergency response 24/7
- managing new connections or changes in connection, to our assets

Our people

- managing the planning, scheduling, safety, health and wellbeing of our workforce and our fleet
- managing the lifecycle of employment for our people or our contingent workforce
- enabling recruitment of new talent, including apprenticeships

Our communities

- working in our communities and listening to our customers
- creating events with the public and stakeholders
- working with school children in the classroom and at events
- encouraging our teams of volunteers to head out into their own communities, making a difference by protecting our natural environment

Our security

- ensuring robust access controls to our systems and the Personal Data we hold digitally and physically
- ensuring the security of our people, workplaces and assets

Managing our business

- ensuring effective financial accounting, risk management, audit, fraud control and managing our regulatory environment
- managing our billing and revenue activities
- managing our supply chain

Investing in our assets

- delivering a portfolio of investment in order to continually improve our service capability
- delivering maintenance and surveys of our assets to ensure a resilient service
- building our knowledge, analysing and predicting future demands

Scottish Water International

- providing consultancy services, delivering expertise to governments worldwide

Scottish Water Horizons

- ensuring a growth agenda by delivering innovative, profitable and sustainable opportunities



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WHAT TYPES OF PERSONAL DATA WE HOLD

Contact

- Contact details, such as name, address, email address, phone number, preferred contact method or your text alert mobile number if you have registered for this
- Contact details of our business customers, licensed providers, business suppliers and sole traders
- Contact details in relation to enquiries
- Recordings of calls through our call centre, or feedback calls in response to a survey
- Sensitive Personal Data regarding a vulnerable household
- Responses and feedback via surveys
- Images or videos, if taken with your consent

Services

- Details such as name, address and the type of connection to our assets, like water and waste water
- Images of work locations, such as property frontages to enable verification of services

Billing

- Customer billing Personal Data, including contact details, billing address, quotes, charges, payment history for the billing activity that Scottish Water manages directly, such as septic tank billing, or metered domestic billing
- Bank details, if you pay for your domestic metered bills by direct debit
- Payment card details over the phone for bill payments, however these are processed direct to a card reader and never retained by Scottish Water

Security

- CCTV images from our assets and workplaces
- Attendance details, such as name, car registration, and contact details, at Scottish Water events or sign in at one of our offices
- "User" details, such as name and email address when you interact with one of our digital systems, for instance when you are registering with our website

Additionally we may hold Personal Data in relation to:

- any legal proceedings or insurance claims, which may include sensitive Personal Data, such as injury
- enable the management of an emergency incident when working with emergency services, including health boards, and this may include additional sensitive Personal Data regarding vulnerable households

WHY WE NEED IT –

We hold your Personal Data for a variety of operational purposes to:

Our contacts, customers, communities and services

- provide you with our services, including water and waste water services
- interact with our customers or individuals in order to handle any enquiries, requests or complaints
- contact you about issues that may impact you, such as interruptions to supply, water quality issues, or major roadworks
- manage water quality sampling, water byelaws and trade effluent regulations
- keep our records accurate and up-to-date
- manage contact details related to enquiries such as property leases, land boundaries, ownership and fishing rights
- use recordings of contacts to our call centre for training purposes
- engage with sole traders, or businesses regarding relevant services, accounts or contracts



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- use images or videos of an individual within our internal communications channels, only with explicit consent
- enable us to communicate with the customers and communities we work in
- interact with our customers through social media channels, though we will never share customer Personal Data or images without explicit consent
- interact with people under the age of 16 when working with schools, though we will never collect any Personal Data or use any images without explicit consent

Improving our business

- understand our business better, and analyse and improve services, such as trends within a geographic area, flooding risks, our business performance and what the future might look like
- carry out surveys to obtain and analyse voluntary feedback on our services and future plans

Managing emergencies

- manage emergency situations, including those regarding public health, and take extra steps regarding a vulnerable households

Legal obligations

- comply with any legal or health and safety obligations we may have
- use Personal Data about our workforce, our customers or individuals in relation to any claims or legal proceedings and these will be collated by case

Protecting our business

- ensure cyber and data protection or investigate any breach
- investigate fraud or other potential wrongdoing
- capture images on CCTV for security purposes in monitoring the protection of our assets and sites
- meet our legal obligations to the National Fraud Initiative

Billing

- bill customers directly for certain services, such as septic tank emptying
- allow customers to pay their domestic metered water bills by direct debit
- allow customers to pay via our website with credit or debit cards; debit or credit card Personal Data is never retained on our website
- allow customers to pay bills by phone if they choose to
- verify the connection that a household has to our services and provide this information to local authorities to enable them to produce accurate bills
- manage any debt and contact our customers regarding payments outstanding

We do not utilise credit reference agencies for domestic customers but from time to time we may verify Personal Data provided by you against publicly available Personal Data such as the electoral register.

Local authorities, acting on our behalf, use your Personal Data to collect charges and to pursue debt. They may also engage debt recovery agencies or Sheriff Officers. Some local authorities have adopted the Water Direct Scheme, which allows them to recover water charges directly from benefit payments.

WHO CAN ACCESS IT –

- We ensure all access to Personal Data within our systems is restricted to the appropriate people where relevant to their job
- Approved staff have privileged access to Personal Data to provide services, such as systems support, data management, audit controls, analytics, access management or to investigate fraud and wrongdoing
- Robust privileged access controls are in place and verified on a regular basis
- Access to our corporate social media accounts is strictly controlled and reviewed regularly



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- Unstructured digital files, such as documents or spreadsheets containing personal or sensitive Personal Data are saved in secure storage and only accessible to people with approved access
- We have secure areas for relevant physical documents with locked cabinets or doors and access is only provided where relevant
- Physical documentation archived into our corporate storage facility is secured and accessible only by approved staff
- Internal email is password controlled and best practice is actively encouraged to ensure any attached Personal Data is password protected
- If we do have to send Personal Data out with Scottish Water the email and attachments are secured

HOW WE PROCESS PERSONAL DATA –

- We include it in physical documents such as letters
- We capture it digitally and process it in our systems
- We use it on our mobile devices
- We use it digitally through email and communication tools
- We process it digitally through unstructured files such as documents and spreadsheets
- Verbally when we are interacting with our customers or within Scottish Water
- Through audio when we record a call through our call centre or feedback from our customers
- We may hold images and video of you
- Text alerts where you have registered for these updates

WHO WE SHARE IT WITH –

You can request more information about our third parties from the Head of Corporate Data & Compliance at Scottish Water. We may share Personal Data with:

- our approved contractors, who will often undertake service activities on our behalf and they will only see the relevant Personal Data that they need to carry out the task
- our Alliance Partners, and in some circumstances other third parties in order to facilitate activities
- our third party feedback provider, which uses customer contact data to obtain voluntary feedback about our services or future plans
- a third party production specialist or externally on the internet relating to the use of a customer's image or video footage, only with explicit consent
- approved or appointed individuals or companies in relation to legal proceedings or insurance claims
- an approved third party provider who requires some billing data to print and post our bills for us
- relevant licensed providers and the Central Market Agency
- an approved third party who requires relevant Personal Data to manage certain debt collection activities on our behalf
- local authorities or licensed providers who require customer contact and property details when verifying or notifying a change in connection service
- health boards may share sensitive Personal Data with us in order to update our vulnerable household details

We aim to ensure that all third parties have appropriate data protection safeguards in place.

HOW LONG WE KEEP IT FOR –

- We aim to only retain Personal Data for as long as we need it to provide our services
- We are required to retain some Personal Data for longer periods, such as financial data, health and safety
- We only retain recordings of calls through our call centre for 12 months
- We retain some Personal Data for longer periods to enable analysis



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- We operate a standard retention schedule for our physical records storage facility which is available on request

BUSINESS REPORTING & ANALYSIS

We develop and use various reports and analysis to understand our business better, such as preparing future plans, managing risks and identifying improvement areas. This analysis will also enable us to measure the performance of our business including customer experience.

The access controls already outlined in this document will apply to any report where Personal Data is not summarised or anonymised.

We may use anonymous data from out with Scottish Water to help in our analysis, such as published population projections.

TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EU

We aim to never share your Personal Data with any third party that is not within the EU. We do have individuals who are out with the EU who can access our systems that contain Personal Data. This access is only approved for the purposes of system maintenance and support.

We host our data within Scottish Water data centres or out with Scottish Water on other UK or EU data centres. We have robust contractual arrangements with third parties addressing data protection.

CHANGES

From time to time, we may amend this notice to reflect changes in our business, changes in the law, to make it easier to find on our website, or for other reasons. We will do this by posting the amended notice on our website, so please check the website to ensure you are aware of the latest version.

OUR WEBSITE

Our website may contain links to other websites. Please note that when you follow one of these links these websites have their own privacy policies. We do not accept any responsibility or liability for their content or any Personal Data provided to them by you.

Our site uses “cookies”, (remember me) options. Cookies aim to identify the computer used, not the individual user, and records the areas of the site visited and for how long. Your browser has options to accept, reject or provide you with notice when a “cookie” is sent. We have additional cyber controls which mean the IP address of your computer is never retained by Scottish Water. You can view our Cookie Policy on our website.

YOUR RIGHTS

Individuals to whom Personal Data relates are called “data subjects” and have rights which include:

- to request from us a copy of any Personal Data we hold about you
- to fix Personal Data that is not accurate
- to remove Personal Data in certain circumstances, where this this does not breach any legal, regulatory, safety, security or core operational requirement

Please refer to the Subject Rights area on our website for a full list of data subjects’ rights and to initiate a request. We aim to meet all data subject access requests within a 30 day period and we will not charge you for this.

You have the right to make a formal complaint to the Information Commissioner’s Office (ICO).



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CONTACT US REGARDING YOUR DATA

- Email us: corporatedatacompliance@scottishwater.co.uk
- Write to us: Head of Corporate Data & Compliance, Scottish Water, Castle House, Carnegie Campus, Dunfermline, KY11 8GG
- If you have an informal complaint write to: Data Protection Officer, Scottish Water, Castle House, Carnegie Campus, Dunfermline, KY11 8GG or email DPO@scottishwater.co.uk
- Subject Rights: please utilise the request processes under the Subject Rights area on our website