



## PRIVACY NOTICE

Last updated: 24th May 2018

### **SPEED READ: THIS IS WHAT YOU NEED TO KNOW**

We always recommend that our customers read this privacy notice in full. It explains who we are, how and why we collect personal data from you, how and why it will be processed by us and our commitment to protecting your data.

But just in case you're on the move or do not have time to read it in full we have summarised the key points for you in our 'speed read' section below.

- We are Affinity for Business (Retail) Limited (**Affinity for Business, we, our or us**). We are registered as a data controller with the Information Commissioner's Office and our registration number is ZA242992.
- We process (i.e. handle) your personal data to provide our services to you. Under data protection laws, we are only permitted to process your personal data where we have a legal basis for doing so. We will only ever process your personal data in compliance with applicable law.
- We may share your personal data with our third-party suppliers, including sub-contractors and data analysts, to enable the efficient and secure provision of services to you. Except as explained in this privacy notice, we will not share your data with third parties without your consent unless required to do so by law.
- We will keep your personal data for as long as we need it. How long we need your personal data depends on what we are using it for, whether that is to provide services to you, for our own legitimate interests (described below) or so that we can comply with the law. We will actively review the information we hold and when there is no longer a customer, legal or business need for us to hold it, we will either delete it securely or in some cases anonymise it.
- We may transfer your personal data to a recipient located outside of the European Economic Area (**EEA**). If we do this, we will ensure that the transfer mechanism provides an adequate level of protection, which has been recognised by the European Commission.
- You have important rights under laws aimed at protecting your personal data. This notice sets out your rights and how can you exercise them. For more information, see section 11. You also have the right to make a complaint to the Information Commissioner's Office if you are unhappy with how we have handled your personal data. For more information see section 13.

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## 1 ABOUT AFFINITY FOR BUSINESS

Affinity for Business (Retail) Limited (**Affinity for Business, we, our or us**) is a company registered in England and Wales under company number 999933767 whose registered office is at Tamblin Way, Hatfield, Herts, AL10 9EZ.

We are registered as a data controller with the Information Commissioner's Office and our registration number is ZA242992.

## 2 ABOUT THIS PRIVACY NOTICE

This privacy notice applies to the personal data we collect about you through our website [www.affinityforbusiness.co.uk](http://www.affinityforbusiness.co.uk) and the My Account and E-billing portals, by post, by telephone, in person (for example at your doorstep), through our social media platforms, through our app, from third parties and when you otherwise communicate with us.

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 important changes to our privacy notice.

## 3 WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

This section informs you of what information we collect about you and why. Personal data means any information about an individual from which that individual can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, surname, username or similar identifier, marital status, title, national insurance number, date of birth and gender.
- **Contact Data** includes billing address, delivery address, postcode, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, any preferences communicated to us to enable the personalisation of services, your behavioural history (if relevant, e.g. threatening or abusive behaviour) and your feedback and survey responses.
- **Usage Data** includes information about how you use the Website and how you consume the services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data is not considered personal data in law as this data does not directly or indirectly reveal your identity. An example of Aggregated Data would be where we use your Usage Data to calculate the percentage of users accessing a specific Website feature. If the Aggregated

Data is combined with other personal data to directly or indirectly identify you, we will treat this combined data as personal data and in accordance with this privacy notice.

#### **4 HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

##### **Direct interactions:**

We collect personal data about you if you fill in forms on the Website or correspond with us by telephone, email or otherwise. This includes information you provide when you:

- register to set up an account with us using the My Account or E-billing portal on our Website;
- provide us with meter readings or report damage to infrastructure (such as a leak);
- engage with us through water efficiency promotions;
- enter a competition or survey; or
- report a problem with our Website or give us feedback.

We may also ask you to share your personal data with us if it is necessary for us to provide our services to you – for example, we may ask if you require priority services.

We may process personal data that you manifestly choose to make public, including via social media (e.g. we may collect information from your social media profile(s), to the extent that you choose to make your profile visible). If you send us a private or direct message via social media, the message will be stored outside of the application but in accordance with this privacy notice.

##### **Automated technologies or interactions:**

If you use our Website, we automatically collect the following information:

- web usage information (e.g. IP address), your login information, browser type and version, time zone setting, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our Website (including date and time); time on page, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs).

Where we collect information about you in the ways described above, we do so on the basis that it is in our legitimate interests to collect and process this data. In most situations, this will be anonymised but we collect and process this data to ensure that our site is functioning properly and that our customer experience is to the standard that you and we expect.

The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We also use cookies on our Website. Please see this section see section 12 for more information.

We may use your information to ensure that you receive information that is relevant to you or to your circumstances. For example, to ensure you are on the correct tariffs, whether you would be entitled to benefit from a government payment scheme or whether you would benefit from having a water meter. The information we may use to create such a profile may include your water consumption, payment history, demographics or information provided by third parties such as credit reference agencies.

**Information we receive from other sources:**

We may receive information about you from third parties who provide it to us. MOSL will process personal data about non- household water customers (“NHH customers”) who are sole traders, as well as the personal data of the representatives and employees of trading parties registered to eligible water and sewerage supply points in the non-household retail water market (as defined in the Water Act 2014 and market codes). Full details can be found at MOSL’s website here- <https://www.mosl.co.uk/news/details/gdpr-privacy-notice>

In addition, we are also working closely with third parties, (including, for example, our regulators; Wholesale water companies in your area; sub-contractors in technical, and payment services; analytics providers; and credit reference agencies and fraud prevention agencies) and may receive information about you from them.

When we receive information from other sources, we rely on them having the appropriate provisions in place telling you how they collect data and who they may share it with. We carefully check our sources to ensure that we only receive your information when it is lawful for us to do so.

**5 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

This section explains how we will use personal data you provide to us in order to carry out the activities relevant to the provision of our services to you.

We must have a legal basis for processing your personal data. We consider that we have a legal basis where:

- we have a contract to supply water and related services
- you have given us consent to do so for the specific purposes which we have told you about
- it is necessary for us to do so to enable us to provide you with the services - for example, contacting you about any disruptions to service;
- it is necessary in order to fulfil our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- the law permits or requires it.

Where we process your personal data on the basis of our legitimate interests, these are our (or our third party’s) interests in providing our services to you in an efficient and secure manner.

We have set out below a list of all the ways we may use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

In some cases we may use more than one legal basis for processing your personal data; this will depend on the specific purpose for which we are using your personal data. Please contact us if you have any queries about the specific legal basis that we rely on for processing your personal data.

What we use your personal data for (purpose)	Type of data	Legal basis for processing (including basis of legitimate interest)
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<b>To register you as a new customer</b>	(a) Identity (b) Contact	(a) Performance of a contract
<b>To update the Central Market Operating System (CMOS)</b>	(b) Identity (c) Contact (d) Supply point (e) Usage	(f) Performance of a Legal Obligation
<b>To carry out our obligations to provide you with services including:</b>  (a) <b>carrying out meter checks;</b>  (b) <b>collecting and recovering money owed to us;</b>  (c) <b>running fraud checks if we have reasonable suspicions;</b>  (d) <b>provide you with the information and services that you request from us including, but not limited to, contacting you about your service;</b>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Health (f) Marketing and Communications	(a) Necessary for our legitimate interests (to recover debts due to us, to pay refunds or compensation owed to you and to prevent us facilitating fraud)  (b) Performance of a contract  (c) Necessary to protect the vital interests (this is in respect of our priority service customers who have not provided us with consent to process their Health Data)
<b>To provide priority services to vulnerable persons</b>	(a) Identity (b) Contact (c) Health	(a) Consent  (b) Necessary to protect the vital interests
<b>Managing payments and charges, paying refunds or compensation for example under the Guaranteed Standards Scheme;</b>	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Necessary to comply with a legal obligation  (b) Performance of a task in the public interest  (c) Necessary for our legitimate interests (to refunds or compensation owed to you)

<b>To respond to your enquiries or to process your requests in relation to your information.</b>	(a) Identity (b) Contact	(a) Performance of a contract
<b>To maintain a suppression list should you opt-out of receiving communications</b>	(a) Identity	Necessary for our legitimate interests (to ensure that we are not at risk of breaching data protection laws by communicating with you where you have asked us not to.)
<b>To manage our relationship with you which will include:</b>  a) notifying you about changes to our Website, services, terms or privacy notice; and  b) asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing Communications	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to recover debts due to us)
<b>To enable you to partake in a prize draw, competition or complete a survey</b>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
<b>To administer and protect our business and the Website (including training our employees, troubleshooting, data analysis, testing, system maintenance, security audits, support, reporting and hosting of data).</b>	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
		(c)
<b>To deliver relevant website content to you and measure or</b>	(a) Identity	Necessary for our legitimate interest (to study how you use our services, to

<b>understand its effectiveness.</b>	(b) Contact (c) Profile (d) Usage (e) Marketing Communications (f) Technical	develop them, to grow our business and to inform our marketing strategy)
<b>To use data analytics to improve the Website, services, marketing, customer relationships and experiences</b>	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep the Website updated and relevant, to develop our business and to inform our marketing strategy)
<b>To make suggestions and recommendations to you about goods or services that we feel may interest you</b>	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing Communications	Necessary for our legitimate interests (to develop our services and grow our business)
<b>To establish, exercise and defend our legal rights</b>	(a) Identity (b) Contact (c) Financial (d) Transactional (e) Technical (f) Profile (g) Usage (h) Health (i) Marketing Communications	(a) Necessary for compliance with a legal obligation  (b) Necessary for our legitimate interests (for the purpose of establishing, exercising or defending our legal rights)

## 6 COMMUNICATIONS

This section is to explain how we will ensure that you only receive communications that you wish to receive.

### Marketing communications:

This section is to explain how we will ensure that you only receive marketing communications that you wish to receive.

We want to ensure that you are informed and aware of the best services, water efficiencies, promotions and events that we can offer you. By consenting to receive additional communications (by mail, telephone, text/picture/video message or email) from us and any named third parties that feature at the point of obtaining consent in respect of such information, we will process your personal data in accordance with this privacy policy.

You can change your marketing preferences and unsubscribe at any time by contacting us at 0345 357 2424. If you choose not to receive this information we will be unable to keep you informed of new services and promotions that may interest you.

Whatever you choose, you'll still receive other important information, for example service updates, as described below.

### **Service communications**

As detailed in the table at section 6, we may send you communications such as those which relate to any service updates (e.g. service disruption) or provide customer satisfaction surveys. We consider that we can lawfully send these communications to you as it is necessary for the performance of a task carried out in the public interest. Additionally, we also consider that we have a legitimate interest to do so, namely to effectively provide you with the best service we can and to grow our business.

## **7 WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA**

This section is to explain who, within Affinity for Business, will have access to your data. Your personal data will only be seen or used by our employees who have a legitimate business need to access your personal data for the purposes set out in this privacy notice.

We take your privacy seriously and have implemented appropriate physical, technical and organisational security measures designed to secure your personal data against accidental loss, destruction or damage and unauthorised access, use, alteration or disclosure.

## **8 WHO ELSE MIGHT WE SHARE YOUR PERSONAL DATA WITH**

This section will inform you of who we share your personal data with and why. Except as explained in this privacy notice, we will not share your personal data without your consent unless required to do so by law.

We may share your personal data with you, and where we have obtained your consent to do so, your associates and your representatives.

We may disclose your personal data to the Police, Department for Work and Pensions, HMRC, UK Visas and Immigration 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 who assist us with administering the provision of our services to you:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you analytics and search engine providers that assist us in the improvement and optimisation of our site;

- our regulators and industry bodies including MOSL, OFWAT, the Consumer Council for Water, the Drinking Water Inspectorate, the Environment Agency and local flood authorities to in order to comply with our regulatory obligations and to help resolve complaints or other issues; and
- agents we engage to perform functions on our behalf including repaying compensation claims for delay, sending customer communications, analysing data, providing marketing assistance, processing payments, collecting debts owed to us, researching customer satisfaction, responding to emergencies, customer translation services and providing customer service. They have access to personal data needed to perform their functions, but may not use it for other purposes.

We may also pass Aggregated Data on the usage of our site (e.g. we might disclose the numbers of visitors to our site that come from different geographic areas) 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.

## **9 HOW DO WE PROTECT YOUR PERSONAL DATA?**

This section explains how we keep your personal data safe and where it will be held.

We take your privacy seriously and are committed to maintaining the privacy and security of the personal data you provide to us, and the choices you have regarding our collection and use of your personal data.

Once we have received your personal data, we follow strict security procedures as to how your personal data is stored and used, and who sees it, to help stop any unauthorised access.

Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You should not share this information with anyone.

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). When we transfer and store your personal data outside of the EEA we will ensure that it is adequately protected by using appropriate safeguards as further detailed below.

Staff operating outside the EEA who work for us, or one of our suppliers, may process the information. 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 from the EEA to a recipient outside the EEA in a country not recognised by the European Commission as providing an adequate level of protection for personal data, such transfer shall be covered by a framework recognised by the relevant authorities or courts as providing an adequate level of protection for personal data including but not limited to:

- Standard Contractual Clauses (the agreement in the form annexed to the European Commission's decision of 5 February 2010 on Standard Contractual Clauses for the transfer of personal data to processors established in third countries which can be found [here](#)); or
- The EU-US Privacy Shield Framework.

Unfortunately, the transmission of your personal data via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your

data transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

## **10 HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

This section explains the length of time that we will retain your personal data.

We will keep your personal data for no longer than is necessary for the purposes for which it was obtained. The criteria for determining the duration for which we will retain your personal data are as follows:

(1) we will retain your personal data in a form that permits identification only for as long as:

- a. we maintain an ongoing relationship with you; or
- b. your personal data is necessary in connection with the lawful purposes set out in this notice for which we have a valid legal basis.

plus

(2) the duration of:

- a. any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your personal data, or to which your personal data may be relevant); or
- b. an additional reasonable period following the end of such applicable limitation period.

and

(3) in addition, if any relevant legal claims are brought, we may continue to process your personal data for such additional periods as are necessary in connection with that claim.

During the periods in paragraphs (2)a and (2)b above, we will restrict our processing of your personal data to the storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim or obligation under applicable law.

After this period your personal data will be anonymised so that you are no longer identified or identifiable from such information, or securely deleted/destroyed.

Any third parties that we engage will keep your data stored on their systems for as long as is necessary to provide the relevant services to you or us. If we end our relationship with any third party providers, we will make sure that they securely delete or return your personal data to us.

We may retain personal data about you for statistical purposes. Where data is retained for statistical purposes it will always be anonymised, meaning that you will not be identifiable from that data.

## **11 WHAT ARE YOUR RIGHTS?**

This section explains that you have a number of rights in relation to your personal data. There are circumstances in which your rights may not apply. You have the right to request that we:

- provide you with a copy of the personal information we hold about you;
- update any of your personal information if it is inaccurate or out of date;

- delete the personal data we hold about you - if we are providing services to you and you ask us to delete personal data we hold about you then we may be unable to continue providing those services to you;
- restrict the way in which we process your personal data;
- stop processing your data if you have valid objections to such processing; and
- transfer your personal data to a third party.

You have the right to object to automated decision-making. This is where a decision, which produces legal effects or similarly significantly affects you, has been based solely on automated processing (including profiling). We are allowed to use automated decision-making in the following circumstances where we are authorised by law and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

For more information on your rights and how to use them, or if you would like to make any of the requests set out above, please contact us using the details provided in this section see section 13.

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.

As explained in the section on Communications above, even if you consented to the processing of your personal data for marketing purposes (by ticking the relevant box or by requesting information about services), you have the right to ask us to stop processing your personal data for such purposes. You can exercise this right at any time by contacting us at [enquiries@affinityforbusiness.co.uk](mailto:enquiries@affinityforbusiness.co.uk) or 0345 357 2424.

## **12 COOKIES**

The Website uses cookies. Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. For more information please see our Cookies policy <https://www.affinityforbusiness.co.uk/cookie-privacy/>

## **13 WHO CAN YOU ASK FOR MORE INFORMATION?**

If you have any questions or concerns about how we handle your personal data, you can contact us using any one (or more) of the following:

Post: FAO Data Protection team, Affinity for Business (Retail) Ltd., Alchemy - 2nd Floor, Bessemer Rd, Welwyn Garden City AL7 1HE

Email: [enquiries@affinityforbusiness.co.uk](mailto:enquiries@affinityforbusiness.co.uk)

Or you can use the contact form on our Website - <https://www.affinityforbusiness.co.uk/contact-us/>

If you are unsatisfied with our response to any data protection issues you raise with us , 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.