



SMART WATER METER PRIVACY NOTICE

Introduction

This Privacy Notice tells you how we collect and use your personal data when you have a Smart Water Meter installed at your home. A Smart Water Meter is simply a meter which collects and sends data on the water flow into your property using a communications network. Smart is sometimes referred to as AMI (Advanced Metering Infrastructure, or enhanced metering.)

This Privacy Notice should be read in conjunction with Portsmouth Water's General Privacy Notice.

Personal data is any data which can identify you or be used to identify you. It can identify you either on its own or when joined to other data. Water consumption data and other data associated with your Smart Water Meter is considered personal data.

Who are we?

This Notice relates to Portsmouth Water Limited (Company Number 2536455) as the principal subsidiary in the South Downs Group but will also apply to other subsidiaries.

We are a registered data controller, registration number: Z6707640. This means it is our responsibility to maintain and protect all personal data that we collect and ensure that anyone we share personal data with will also adequately protect that data.

Business/Non-Household Customers

If you are a business, charity or public sector organisation within the Portsmouth Water supply area and you have any questions or concerns, please contact your retail service provider. We have also provided information within our Customer Privacy Notice.

If you do not have a retailer, please visit open-water.org.uk for a list of retailers operating in the Water Retail Market.

What data do we collect from your Smart Water Meter information and use?

Once we have installed a Smart Water Meter at your home, we will collect water consumption data and other data from your meter.

In summary, we collect:

- Your meter serial number.
- The meters communication pack serial number.
- The type of meter you have installed.
- Meter readings that will tell us how much water you have used.
- The meter monitors several alarm parameters which tell us that there may be a problem with your meter (e.g. continuous flow, backflow).
- The property the meter is recording for and the location of the meter (i.e. the footpath outside the property or What3words).

Data we collect from your Smart Water Meter is combined with other data, including personal data, which has already been collected and is currently being processed by Portsmouth Water for other purposes, e.g. customer data (name and contact details), property identification number, meter serial number, account information etc. For more information on how Portsmouth Water uses personal data generally, please see our Customer Privacy Notice which can be found on our website.

Special Category Personal Data

Different rules apply to data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, data concerning sexual orientation or sex life, along with biometric and genetic data, which are all called special category personal data.

The data that we collect and use from your Smart Water Meter does not fall within the category of special category personal data.

For information about the special category personal data that we process, please refer to our Customer Privacy Notice.

When do we collect data from your Smart Water Meter?

When a Smart Water Meter is installed at your property, we will collect water consumption data and information about your meter's performance. The meter will log the flow data on an hourly basis. This data is sent to us retrospectively between every 4-24 hours, meaning the data is not provided in real time.

In the event of an alarm indicating that there may be continuous flow or a leak on your supply, we will automatically switch the read frequency from hourly to 15 minutes for a period of 48 hours to allow us time to establish with greater accuracy whether there is a potential leak on your supply.

If we suspect a meter is not functioning correctly, we will switch the frequency to this same period (15 minutes) and duration (48 hours) to enable us to investigate.

How do we use the Smart Water Meter readings?

Meter readings are used to bill you as a customer, detect potential leakage and to encourage lower water consumption. We will only use the meter readings to bill you for the water you've used if this is how you pay.

We will use **hourly readings** for several different activities:

- Water usage analysis – we will use this information to inform our water efficiency projects across our geographical area and help us manage periods of peak demand.
- Enable you to see how much water you are using – monthly, daily and hourly.
- To help us create water usage reports and advice to help you save water.
- Compare your property's water usage with similar properties and show how your water usage trends to similar households in your area.
- To share water usage data with law enforcement agencies when required to do so for the purposes of preventing or detecting a crime.
- To identify if we think your property has a water leak.

We will use **15-minute readings** in the following situations, this will be a temporary change for a 48-hour period only:

- Spotting leaks – if we notice your consumption is increasing faster than normal it may indicate that there is a problem with your supply. We will monitor your usage closely and contact you directly to let you know there could be an issue as soon as we spot it.
- Diagnostic checks – if we suspect our meter is not functioning as it should, we will use more granular data to investigate.

If a customer requires more detailed meter information than hourly, we may be able to assist and provide 15-minute readings for an agreed, short period of time (outside of the above activities). This would only be agreed in limited circumstances.

Why do we need to collect and use personal data from your Smart Water Meter and what is the legal basis for using it?

Portsmouth Water will make available the Smart Water Meter data to Portsmouth Water and framework suppliers to undertake the activities as listed below for the fulfilment of their role and service outcomes. Employees outside of delivering the services listed below will not have access to the corporate systems to view Smart Water Meter data.

Purpose of Processing (Why)	Legal Basis
<p>To detect leaks on your supply</p> <p>By using Smart Water Meter data, we can detect continuous flow into your property, which could indicate a leak. We can work with our customers to help identify and resolve leakage, water waste and any potential charges for water being lost.</p>	<p>Public Task</p>
<p>To provide you with improved customer services</p> <p>We use meter reads to provide you with improved customer services, for example access to your usage information (in the form of hourly, daily, weekly and monthly consumption data), to provide you with monthly comparison information so that you can understand your usage better and save, to offer a water survey and give you water saving tips, to identify high usage customers, to drive communications and to send you reminders. We will also use meter reads collected remotely from your Smart Water Meter instead of asking you to take meter readings and send them into us.</p> <p>If you're using water at the property and are a named account holder, at your request, in limited circumstances, we may agree to switch the frequency of meter readings to be more often (15 minutes) for an agreed period for reasons outside of suspected leaks or diagnostic checks.</p>	<p>Legitimate Interests</p> <p>Consent</p>
<p>To support our water efficiency targets</p> <p>We use consumption calculations from your meter reads to support water efficiency messaging in the future. We need to reduce the amount of water used by each household and will use the data to support our campaigns at a household, community and regional level. Only you will see your own usage though.</p> <p>We may also undertake incentivisation programmes with relevant customers in the future based on your usage.</p>	<p>Legitimate Interests</p>
<p>To support our customer with account management processes</p> <p>By using Smart Water Meter reads we can more efficiently process move in and move out requests, automate the meter read process and use up to date accurate meter reads to support you with account queries. We will also be able to more efficiently identify and manage the supplies at empty properties.</p>	<p>Legitimate Interests</p>
<p>To improve our billing process</p> <p>Using frequent consumption data, we collect from Smart Water Meters; we can ensure your bills are more accurate using actual up to date readings.</p>	<p>Legal Obligation</p>

Purpose of Processing (Why)	Legal Basis
<p>For improved asset maintenance</p> <p>Where a meter has stopped working, we can spot where a meter has failed, diagnose the issue and get one of our technicians to resolve the problem.</p>	<p>Public Task / Official Authority</p>
<p>For improved management of the water supplied into the network to meet customer water supply demands</p> <p>Using meter readings, we can compare those figures with the volume of water supplied into the network and for the relevant part of the network, we can identify where there are leaks on Portsmouth Water's pipes which we will then find and fix.</p> <p>We will use usage and leakage data to support our water resources strategy and planning.</p>	<p>Legal Obligation</p>
<p>Improved regulatory reporting</p> <p>By using real water consumption readings (anonymised and aggregated) we can see how much water is used compared to the amount we put into the network for customer supply to improve our leakage estimate data.</p> <p>We will also use the metered usage data to determine the household and per capita consumption data we report to our regulators.</p>	<p>Legitimate Interests</p>
<p>Research and analytics</p> <p>We may use data to analyse the performance of the data transmission network, or connectivity performance, or use anonymised meter data to understand the impact of weather or social events on water consumption in the long and short terms so that we can more accurately plan our water supply strategy for the future.</p>	<p>Legitimate Interests</p>

Who do we share the data from your Smart Water Meter with?

We may share data from your Smart Water Meter with the following categories of third parties for the purposes listed below and/or in the following circumstances:

- with our third-party suppliers and contractors (data processors) who carry out tasks and activities using Smart Water Meter data on our behalf*, e.g. our Smart Water Meter Network Provider, our Water Services Partners and contractors (who need this information to carry out work for us such as fixing leaks on our network).
- with our third-party bill print Supplier and communication partners.
- with organisations who bill on our behalf, such as Non-Household (NHH) retailers.
- Organisations who we undertake meter reading contracts for such as New Appointee Variants (NAVs).
- with Debt Collection Agencies instructed by us to recover customer debt.
- with third parties making disclosure requests permitted by data protection legislation, e.g. police, local authorities, HMRC, our economic regulator (Ofwat) and the NHH retail market regulator (MOSL).
- with regulators who require us to share Smart Water Meter data for regulatory investigations, such as the Drinking Water Inspectorate (DWI) and Environment Agency (EA) and with the Consumer Council for Water (CCW).
- with research organisations for research (on an anonymised, non-personal basis).
- with Housing Associations and Councils, when we believe you have a leak in a rented property.
- with our IT partners who host, manage and develop IT solutions for us.

* When we use third party organisations to help provide services to you, we have contracts in place with them which means that they can't do anything with your personal data unless we've instructed them to do it. They won't share your personal data with any other organisation unless they are instructed by us to do so. They will hold it securely and retain it for the period we instruct.

Where your Smart Water Meter data is processed

Sometimes we will need to share your personal data with third-party data processors in countries that are outside the UK, and some of these will be outside of the European Economic Area (EEA), such as the USA.

When we do this, we ensure adequate safeguards are in place to ensure your data receives the same protection as if it were being processed within the UK or EEA. If you wish for more information about how your data may be processed outside the UK or EEA, please contact our Data Protection Officer.

Automated Decision Making

Automated decision-making uses analytics to help us make better and more timely decisions using your personal data without manual intervention. When using Smart Water Meter data, we use analytics to help understand:

- Whether a customer is likely to have a leak on their water supply or not.
- Whether a property may be the cause of pressure waves in our network caused by very quick and large changes in demand. This is unlikely for any household property.

Examples of automated processing activities using Smart Water Meter data include:

- to understand our customers and to tailor and personalise our processes and communications.
- to provide daily, weekly and monthly water usage information, monthly comparison information to help you understand your water usage and save water.
- robotic process automation (RPA) to automate processes traditionally carried out by a human for enhanced data accuracy, quicker processing times and improved process governance.
- analysis to understand the impacts of weather or social events on water consumption in the long and short terms, so that we can more accurately plan our water supply strategy for the future.
- analysis of water data to identify potential leaks and raise tasks for investigation.

Our New Customer App

We are in the process of developing a new App which customers will be able to download to their personal device/s. The App will give you access to your Portsmouth Water account where you can view and manage your account information (including your Smart Water Meter readings), view and make payments and view recent bills. The App will also include helpful features relating to your Smart Water Meter, such as viewing bespoke water efficiency insights and water savings trackers.

How long will we keep your Smart Water Meter data?

Whenever we collect or process your Smart Water Meter data, we store the data alongside the property the meter is monitoring. As such your consumption information does not travel with you if you move house. This property water flow data is important as it helps us understand how our network performs in relation to the demands put upon it by our customers, such as when extreme weather occurs, during different social events in the year (like bank holidays and Christmas). In some cases, a network event can be very rare, so storing the consumption data for a longer time periods is needed so we can refer to it and maintain a corporate history of best action, forecasting, scenario planning and continuous improvement.

Whenever we collect or process your Smart Water Meter Data, we'll only keep it for as long as is necessary for the purpose for which it was collected. The retention periods for Smart Water Meter Data records vary. If you would like more information on retention, please contact us.

What are your rights over your Smart Water Meter data?

We recognise our customers' right under data protection legislation:

- **Right to be Informed**

You are entitled to know how their data is processed. This notice is designed to provide an overview of all processing activity for this trial. If more specific detail is required, please contact us using the details provided.

- **Right to Access**

You can access their data via a Subject Access Request, for more information please see our Privacy Notice on our website.

- **Right to Rectification**

If your data is found to be inaccurate, we are under an obligation to correct it. This may be done by contacting us using the details provided.

- **Right to Erasure**

You have the right to be forgotten. Personal data shall be deleted where there is no longer a legitimate purpose to the data processing. This is not an absolute right.

- **Right to Restriction on Processing**

We have processes in place to restrict processing where there is a legitimate objection.

- **Right to Data Portability**

We do not currently carry out any such processing. If we do in the future, you can make a request, and this data can be exported from our systems.

- **Right to Object**

If you object to the processing of your data under legitimate interests, you have the right to raise an objection, which will be appropriately considered by us.


- **Right to not be subject to automated decision making**

You have the right to have automated decision making to be reviewed by our personnel.

Any Questions?

We hope this Privacy Notice has been helpful in setting out the way we will handle your personal and how you can exercise your data protection rights. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you.

You can contact our Data Protection Officer at any time by email at dataprotection@portsmouthwater.co.uk or by writing to:

 **Data Protection Officer**
Portsmouth Water
PO Box 8
West Street
Havant
PO9 1LG



UPDATING THIS NOTICE

We may change this Notice from time to time. We encourage all customers to periodically check this Notice on our website to ensure they are aware of the more recent version.

THIS NOTICE WAS LAST UPDATED ON 17 JANUARY 2025.