

# Veolia District Heating Privacy Statement

June 2018

## Introduction

Everyone has rights with regard to how their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers and Veolia recognises the need to treat your information in an appropriate and lawful manner.

This statement sets out how we will process your data in line with current data protection legislation.

## What information we collect

In order for Veolia to provide services to you we must collect certain information about you as an individual, such as:

- Name
- Property address
- Property details
- Contact details
- Personal information such as defined vulnerabilities\*
- Banking information
- Credit and debit card details
- Payment history
- Telephone recordings

We may obtain this information either from yourself or from third parties with whom you've already shared your personal information (i.e. a landlord, letting agent or property management company).

*\*We will only process and store personal information such as defined vulnerabilities if you have provided us with the consent to do so.*

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## Why do we need this information?

To provide you with our energy and additional services Veolia must process your personal information for the following reasons:

- Account registration and ongoing management: In order to set up your account we are required to obtain specific data and confirmation of registration where third parties are involved.
- Service delivery: The performance of the contract under which our services are provided
- Customer support: Queries and complaints handling will be managed using account information and history. For quality and training purposes communications may be monitored and recorded.
- Account life cycle management: Obtaining meter and related equipment details, energy and additional services, billing, payment collection and processing, and debt account management.
- Service improvement: In order to monitor and update our services and communications we may carry out customer surveys.
- Legislation: To comply with legal obligations.

## Information sharing

We may occasionally need to share your personal information within the Veolia Group and with other parties. Below is a list of possible recipients we may share your information with:

- In order to support the process for transferring customer information between Energy Service Providers we may be required to share certain personal information with previous, current and future suppliers to help transfer operations and establish the details of any outstanding debt.
- In order to carry out credit checks prior to entering into an agreement we may share personal information with financial or credit reference agents.
- In order to meet legal and regulatory requirements we may share personal information with fraud prevention agencies.

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- For debt management purposes we may in certain cases be required to share personal information with debt collection agents.
- We may disclose information when required by law or legal process for the administration of justice, to protect your vital interest, for investigations by law enforcement or regulatory bodies, to protect and defend Veolia's property and legal rights or by order of a valid order from a court or law enforcement agency.
- Organisations who act as service providers to Veolia such as providers of telecommunications, IT, security postal services, data storage, document storage and destruction, fraud detection and financial transaction processing.
- We may also pass personal information to our agents and service providers and group companies when relevant for these purposes, including the use of cloud providers.
- Relevant parties if we believe there is a threat to an individual, including any residents or staff.

## How long do we keep this data?

We will retain this personal information about you for as long as is necessary for the purpose for which it was collected. In particular:

- We will retain the data for as long as is necessary for us to provide you with our defined services.
- We will retain records of any transactions you enter into with us for services requested or utilised for a period of up to 6 years after the date of the transaction giving us enough information to deal with related queries, outstanding debt, or disputes in this time.

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## Your rights

Under Data Protection law you have rights related to how we protect and look after your personal information.

You have the right to ask us for your personal information that we hold and process. This is known as a subject access request.

You can also ask:

- that any inaccurate information we hold about you is corrected.
- that we delete information about you in certain situations.
- that we stop using your personal information for certain purposes.
- that we don't make decisions about you by completely automated means.
- that personal information you have given us be provided to you in a common machine readable format, or sent to a third party where this is technically feasible.

The rights set out above may apply in limited circumstances, and we may not always be able to comply with your request to exercise these rights. We will always try to respond to a request to exercise your rights within 1 month.

If you are unhappy with the way we handle your personal information, please contact us at the address below. We will try to address your concerns. If you have a complaint about the way we have handled your information, you can contact the Information Commissioner's Office who is the relevant authority in the UK, or the Data Protection Commissioner who is the relevant authority in EIRE.