

Smart Meter Data Privacy Policy

About this policy

This privacy policy ("Policy") describes how Western Power Distribution (East Midlands) Plc (company number 2366923); Western Power Distribution (West Midlands) Plc (company number 3600574); Western Power Distribution (South West) Plc (company number 2366894) and Western Power Distribution (South Wales) Plc (company number 2366985); (collectively, "WPD") collects, stores and uses information that identifies individuals ("Personal Information") in connection with the collection of smart meter data.

In this Policy, references to "we", "us", and "our" (and other similar terms) means WPD and "you" and "your" (and other similar terms) mean our customers.

For the purpose of the EU General Data Protection Regulation, each WPD company is a data controller and the registered office is at Avonbank, Feeder Road, Bristol BS2 0TB.

This Policy is an important document because it explains the way that we use the Personal Information we collect from you, what our legal basis is for processing that Personal Information, and to set out what rights you have in relation to your Personal Information.

This Policy is comprised of the following Sections:

Section 1: Personal Information that we collect about you and the purposes for which we use it

Section 2: Legal basis for use of your Personal Information

Section 3: We share your Personal Information with third parties in certain circumstances

Section 4: Retention of Personal Information

Section 5: Security of your Personal Information

Section 6: Your rights

Section 7: Changes to this Policy

Section 8: Contact us

1. Personal Information that we collect about you and the purposes for which we use it

Smart meters and your information

The UK Government's aim is that every home in the UK should have a smart electricity meter by 2020. Smart meters have a number of advantages over conventional meters. For example, customers with a smart meter will be able to find out how much energy they are using via a digital display in their home, and suppliers will no longer need to take meter readings in order to produce a bill. Smart meters collect information about your electricity consumption every half hour automatically. This is considered to be Personal Information.

As a distribution network operator we have a legal duty to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. We may use your Personal Information to provide our services in connection with this purpose. In the future information from smart meters will provide distribution network operators like WPD with more information about how much electricity is being consumed across the network. This will in turn help to prioritise work on the

network, connect properties to the network more easily and lead to the improvement of services and a safer and more efficient network.

We are not expecting to collect smart meter consumption data until around 80% of households have a smart meter installed.

How we will use your information

For 99% of customers we will be able to use aggregated smart meter consumption data, so we will not need to store your data at all. For some customers in remote rural areas, we may need to store individual meter readings. We will only use smart meter data to improve our electricity distribution network. WPD is focusing on the way that electricity is required across its entire network and does not intend to monitor or use data collected from smart meters to specifically identify individuals or to make decisions that directly affect you. We will collect information about electricity consumption in order to enable us to run an efficient, coordinated and economical distribution system. For example, we may use the information to help identify when a particular transformer needs to be upgraded or replaced, or we may combine your information with other customers' information to build up a picture of energy consumption in a particular area. Our use of electricity consumption data is regulated by OFGEM.

We may also use your information in the following ways:

- (i) if we have reasonable grounds to suspect theft of electricity from our electricity distribution network;
- (ii) for the purpose of a trial approved by the Secretary of State, provided that we have given you at least 14 days' notice of the trial and provided that you do not object to use of your information for the purpose of the trial.

We will not:

- (i) use your information to contact you with adverts, offers or promotions; or
- (ii) sell or provide your information onto third parties for use for marketing purposes.
- (iii) send your personal information outside the European Economic Area;

2. Legal basis for use of your Personal Information

We consider that the legal bases for using your smart meter consumption data as set out in this privacy policy is necessary for complying with our legal obligations to plan and operate our network efficiently.

3. We may share your smart meter consumption data with third parties in certain circumstances

- We may use consultants, academic institutions and contractors to help us provide services and we give them smart meter consumption data but only to the extent they need it to carry out their specific tasks. We will have contracts in place with them containing obligations regarding the use, security and of Personal Information to ensure that it is protected as much as possible.
- We are regulated by OFGEM and sometimes they request information that may include Personal Information. We take steps to ensure that any data provided to OFGEM is provided securely.
- To comply with the licence conditions imposed on us by Ofgem, in future we may be required to share smart meter consumption data with Independent Connection Providers in relation to their connection activities.
- 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 our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of WPD, our customers, or others.

4. Retention of Personal Information

Storing your smart meter readings

We will retain aggregated smart meter consumption data relating to the network in your area. For 99% of domestic customers we will not store any individual meter readings. However in more remote rural areas we will need to store some individual meter readings. We will store this data anonymously, separate from names and addresses. We will keep this data securely for up to five years, after which time it will be permanently and securely deleted.

5. Security of your Personal Information

We use appropriate technical and organisational measures to protect your Personal Information against unauthorised or unlawful use, and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including data protection obligations) with our third party service providers. We will not pass any Personal Information collected to third parties for marketing purposes.

The computer equipment used to collect, store and process your information must be designed and built in accordance with government or regulatory standards. This includes the smart meters which are required to comply with specific security standards. In addition, we have implemented specific systems, policies and procedures to safeguard your information. For example, where possible we will aggregate information about customers' consumption in order to reduce the risk that an individual could be identified that information.

6. Your rights

You have the right to ask us if we are using your individual smart meter readings.

As smart meter readings are considered to be personal data, if we hold them for your property, you have the right to;

- request a copy of any smart meter readings that we hold
- ask us to correct readings that you think are inaccurate
- ask us to delete readings that you think we no longer need
- ask us to explain why we are using your smart meter readings, including any third parties who may have access, and to ask us to consider any objections you have to this.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your Personal Information (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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information 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.

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.

7. Changes to this Policy

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post.

8. Contact us

How to contact us

If you have any questions about this policy, or about how we use your personal information, please contact us using the following details:

E-mail us at: info@westernpower.co.uk;

Call us on: 0800 096 3080.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your Personal Information.

You have the right to make a complaint at any time to the Information Commissioner Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.