

Online privacy statement

1. Introduction

This privacy notice tells you how we will collect and use your personal data.

Personal data is any data which can identify you. It can identify you either on its own or when joined to other data we have.

2. Who are we?

Anglian Water Services Limited ("Anglian Water") is a company incorporated in England (company number 2366656). Anglian Water is licenced by the Water Services Regulation Authority (Ofwat) to supply water and water recycling services to customers in the East of England and Hartlepool. Anglian Water is the principal subsidiary of the Anglian Water Group. This privacy notice sets out when we may share your information with companies in the Anglian Water Group, our contractors and selected third parties.

Anglian Water also trades under the names of AW Direct, Geodesys, Digdat and Hartlepool Water.

You may contact our Data Protection Officer directly here:

Data Protection Officer, Legal Services

Anglian Water Services Ltd

Lancaster House

Lancaster Way

Ermine Business Park

Huntingdon

PE29 6XU

Or Email us at DPO@anglianwater.co.uk

Alternatively you can phone our call centre on 03457 919 155

3. When do we collect your personal data?

- When we create or administer an account for you.
- When you contact us or we or our partners contact you by any means, including by phone, in writing, by email or online channels, including social media etc.
- When you register and use any of our online services, download or install one of our apps.
- When you choose to complete any surveys we send you.
- When you register to use any of our facilities e.g. water parks.
- From your water meter, including upgraded meters.
- When you've given a third party permission to share with us the information they hold about you.
- When you visit our websites – cookies, online forms etc.
- When you enter prize draws or competitions.
- When you take part in customer engagement activities.
- When you attend any of our car parks and premises which have CCTV systems operated for the security of staff, customers and other visitors. These systems may record your image during your visit.
- When we procure data from third party sources, such as Experian and Call Credit to administer your account.
- When any of our partners collect information on our behalf.
- When you are added to our Priority Services Register.

We also collect data from publicly-available sources (such as the electoral roll and Land Registry) where the information is made public as a matter of law.

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4. What personal data do we collect and use?

The personal data we may collect and use includes:

Personal data type:	Source (if it has not been collected directly from you.)
Contact Information - Your name, address, phone numbers, e-mail addresses and other contact information	As well as collecting this from you, we also get this information from Credit Reference Agencies, and other third parties.
Personal Identifiers - including Date of Birth and National Insurance Number	As well as collecting this from you, we also get this information from Credit Reference Agencies, and other third parties.
Employer details, role and work location	
Copies of personally identifiable documents, such as passport, driving licence (to enable us to confirm your identity where required)	
Information relating to payments, including bank account, debit and credit card details.	
Car registration number	Either directly from you, or from third party reports of Byelaw infringements or via CCTV recording systems
Details of your interactions with us through our contact centres, by email, online or by using one of our apps	

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including - dates of contact, methods of contact. For example, we collect notes from our conversations with you, including comments you make.	
Details of any queries or complaints raised by you through an external consumer body	Either directly from you or from the Consumer council for water or other consumer representative body you have engaged
Details of your visits to our websites or apps, and which site you came from to ours.	
Information gathered by the use of cookies in your web browser. Learn more about our use of cookies	
To deliver the best possible web experience, we collect technical information about your internet connection, device and browser as well as the country where your computer is located, the web pages viewed during your visit, and any search terms you entered.	
Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.	
If and how you would like us (and selected third parties) to contact you with information and offers that may be of interest to you.	
Your responses to any surveys you chose to take part in.	

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Your billing and payment history, and how you manage your account.	
Your financial circumstances and financial history	Credit Reference Agencies
Affordability information including - income details, expenditure details, credit rating and credit scores, asset details, benefits details	Credit Reference Agencies and other third parties.
Public information such as County Court Judgments and bankruptcies, Electoral Register information and fraud prevention information.	Credit Reference Agencies
Information to enable us to assess your eligibility for our affordability schemes, including concessionary tariffs, payment arrangements and assistance funds.	Department of Work and Pensions and other third parties.
Priority services information (including reasons)	Utility and other companies where your consent to share data has been provided
Priority Services information (including health, medical and vulnerability information, temporary and permanent support needs, third party nominee data (name, address, telephone number, date of birth and relationship to you))	Family, friends and carers Utility companies Other third party organisations, such as our partner Alliance organisations, or Citizens Advice Bureau
Details of other people receiving our services with you. For example co-owner information, co-occupant and family member details and childrens' dates of birth.	
Land Registry data	HM Land Registry

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Information about legal enforcement activities	
Health and medical information	
Passwords and user names to access your account	
Job notes from any work carried out for you.	
Property occupation details (move-in and move-out)	
Nominee information including - power of attorney information, third party authorisation details, other nominee details	
Photographs and video images	CCTV systems or filming
Ordering information - Method of payment, orders and receipts	
Recordings of telephone conversations	
Information for security checks	
Whether you are a Homeserve policy holder	Homeserve
Meter consumption data	

Special Category Personal Data

Different rules apply to data concerning race, ethnic origin, political opinions or beliefs, religious or other similar beliefs, trade union membership, physical or mental health, sexual life and any offences committed and sentences or court proceedings relating to actual or potential offences – these, along with biometric and genetic data, are

all called special category personal data. The special categories of personal data we process are:

- Health or medical data – e.g. if you added to our Priority Services Register or apply for any of our affordability schemes, including one of our concessionary tariffs or assistance funds.

When we ask you for special category data, we will make clear to you which data is needed for the particular service and ensure we process the data lawfully.

5. Why do we need to collect and use your personal data/the legal basis for using your data?

Legal Obligation

Where we need to process your data for us to:

- Comply with statutory obligations, such as those imposed by the Water Industry Act 1991, e.g. to supply services and charge for those services.
- Comply with regulatory obligations imposed on Anglian Water by its regulators, e.g. licence conditions set and governed by Ofwat
- Undertake checks for the prevention and detection of crime, fraud and/or money laundering.
- Enable switching of non-household customers between retailers.
- Respond to the exercise of rights under data protection law.
- Contact customers about operational issues and service communications
- Protect colleagues and third parties under Health & Safety legislation
- Undertake billing and collections
- Assess appropriate tariffs

- Make Guaranteed Standards Scheme payments
- Supply customer data to regulators, or their appointed agents, by reason of a legal obligation (Drinking Water Inspectorate, Ofwat etc)
- Investigate water quality events
- Manage water resources

Legitimate Interest

Most of the personal data that we collect from or about you is needed to enable us to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

We set out below the circumstances in which the legal basis for collecting and using your personal data is that we have a legitimate interest in processing this information:

- **Provide Service** - We use personal data to provide you with the services you want, to calculate accurate bills for metered supplies, to administer your account including dealing with any enquiries or complaints that you make and to manage your details. If you apply for a special tariff we may also process special category data to confirm that you are eligible for the tariff, and we will always do this in a lawful way.
- **Service Improvement** - We need to understand how our customers use our services so that we can provide better services. The personal data we use for this purpose could be from sources such as customer satisfaction surveys or readings from upgraded meters.
- **Responsible Lending** - We need to determine appropriate methods of payment for customers and prevent customers building up debts that they cannot afford.

We have a legitimate interest in recording and sharing customer payment information, both settled, paid accounts and accounts in

arrears, with credit reference agencies (CRAs) so that CRAs have accurate and up to date information and that we have accurate and up to date information to:

- Assess creditworthiness
- Verify the accuracy of the data you have provided to us
- Prevent criminal activity, fraud and money lending
- Manage your account
- Trace and recover debts
- Ensure appropriate service offerings

Customers benefit from the ability to build a credit history which could be useful when applying for credit in future with other lenders.

- **Fraud and Crime Prevention** – We need to detect and prevent fraud, money laundering and crime and pass this information to the police and organisations involved in crime and fraud prevention.

We use personal data to protect ourselves and you from fraud by verifying your identity.

- **Recover Debts** – We need to minimise debts by using appropriate means to recover outstanding debts and through tracing people who owe us money. This is beneficial to both the organisation and to customers in general by reducing the cost burden on them from those who do not pay their bills.

We use automated decision making and profiling to identify appropriate debt recovery strategies.

- **Manage our business** – We need to collect certain personal information to monitor, manage and plan our business, ensuring we maintain high quality standards, comply with our policies and procedures and for training purposes.
- **Data Management** – We need to understand where your data is held across multiple systems and file stores, and to be used in big

data projects. This enables us to manage data appropriately, respond promptly to your access requests, and to improve the quality of services we provide to you.

- **Proactive Communication** - We may monitor your account and tell you if anything unusual has happened. For example, if we get a very high meter reading this could indicate a leak, so we may contact you to let you know this information.
- **Service issues** – We may need to contact you about service related issues including interruptions to supply, water quality issues, planned maintenance that could/will affect supplies and major roadworks that would require closure of key roads or commuter routes.
- **Customer Education** - We educate customers on their legal responsibilities in connection with water and sewerage supplies
- **Customer Profiling** - We use profiling to understand our customers and to tailor and personalise our processes and communications.
- **Water Efficiency** - We use personal data to promote and provide water saving devices and water saving initiatives, to reduce leakage, to determine water usage and to forecast and model consumption.
- **Customer Feedback** – We gather feedback so that we can produce a “shadow” Customer Measure of Experience and a “shadow” Developer Services Measure of Experience
- **Customer Engagement** – We undertake market research & other customer engagement
- **Research and Analysis**– We may use your data for the purpose of data analytics, statistical analysis and research
- **Homeserve** – We may tell you about the services offered by a third party plumbing and drainage insurance provider, Homeserve, because we have an interest in promoting water efficiency, reducing leaks and the waste of water resources and in educating customers on their pipework responsibility.

- **Water Aid** – Water Aid is the Water Industry’s nominated charity. We may inform you about their activities and how you may choose to support them.
- **Community Engagement** – We work with schools, higher education providers, community groups, businesses, environmental groups and local authorities to communicate Anglian Water’s role in the protection and safeguarding of the environment and to encourage behavioural change in the community, such as through messages on water efficiency and the impact of pollutants.

Consent

Although most of the personal data that we collect is needed because we have a legal obligation to process that data or a legitimate interest in the use of that data, in a small number of cases, we need your consent to collect and use your personal data. We will ask for your consent:

- To send you marketing of recreational services and products
- To take and use a photograph/film of you
- To assess applications for relevant affordability schemes, such as assistance funds
- If you want to appoint a third party representative or if you want us to talk to someone else about your account
- For non-routine customer engagement
- To enable us to obtain and use data from an upgraded meter to provide you with additional customer services

Contract

We do not have contracts with our household customers for the supply of water and associated services. However, we may enter into contracts to supply recreation facilities to our customers. We may also enter into contracts with certain business customers, including developers and self lay organisations. In these circumstances we may

need to process your data in connection with a contract that we have with you:

- For the processing of pre planning applications
- For making changes to water mains supplies and sewers
- For recreation facilities e.g. fishing permits, camping, venue hire

Public Task / Official Authority

There may be some circumstances where processing your data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

Our Priority Services Register (a list of customers with additional service needs) is compiled, maintained and managed on the basis of public interest (and substantial public interest based in UK law, which enables us to process the special category data element of the Priority Services data). We may also share Priority Services data with the Energy sector and other specified third parties on these bases, and in order to meet our legal obligations.

6. About your Consent

Where we need your consent to process your data, we will clearly ask for it and will tell you why we are processing your data.

If you withdraw your consent, we will stop processing your data for the purpose for which you gave consent. This does not mean that we will no longer process your data - we may still process your data if we have another purpose with a different legal basis.

You are entitled to object to direct marketing (even though we may not need your consent to contact you with promotional material in the first place). See section 12 below for more information on your rights. See section 13 below for details of how to withdraw consent.

7. Who do we share your personal data with?

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

- with our contractors and selected third parties to help provide services to you including other water and sewerage companies and Business Process Outsourcers;
- with Outbound Communications providers instructed by us to make contact with our customers;
- with credit reference agencies and other bodies for credit reference purposes, fraud detection and prevention, or as part of our debt collection process. More detail is given on this in section 8 below;
- with Billing agents, such as Luminus Housing, Norwich County Council, Cambridge Water, Affinity Water, Northumbrian Water, Severn Trent Water, Essex and Suffolk Water and Thames Water who bill on our behalf;
- with Debt Collection Agencies;
- with Solicitors instructed by us to recover customer debt;
- with Courts (including the County Court Bulk Centre);
- with High Court Enforcement Officers
- with public data agencies - such as the Land Registry;
- with external agencies such as Local Authorities, Police, Fire and Ambulance Services. For example, in the event of an emergency (this may include special category data such as details of any medical conditions you may have if you have signed up to the Priority Service Register);
- with third parties making disclosure requests permitted by data protection legislation, e.g. police, local authorities, HMRC etc. with our economic regulator (Ofwat) and its appointed data processors and/or agents who do customer satisfaction surveys on our behalf

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- with other regulators who require us to share customer personal data for regulatory investigations , such as the Drinking Water Inspectorate (DWI) and Environment Agency (EA),;
- with third parties that we appoint to carry out marketing research and customer satisfaction surveys, such as BMG Research and Watermelon Research Company.
- With Market Operator Services Ltd (MOSL) to enable switching of non-household customers between retailers;
- with research organisations for research (on a non-personal basis);
- with the DWP to apply for the water direct scheme for vulnerable customers;
- with third parties we appoint to administrator our concessionary tariff schemes to enable contact with vulnerable customers and decide eligibility for reduced tariffs;
- with help organisations such as Citizens Advice Bureau and Step Change;
- with Landlords, Housing Associations and Councils;
- with the Consumer Council for Water (CCW);
- with third parties that we appoint to carry out printing services for us (including card printers and Braille bill printers);
- with our IT partners who host, manage and develop IT solutions for us;
- with selected third parties for marketing purposes in circumstances where we have a legitimate interest in promoting their services, such as Homeserve, who may send you dual branded marketing information on our behalf.
- with other utility companies for the provision of Priority Services.

Where your personal data may be processed

- Sometimes we will need to share your personal data with third-party data processors in countries that are outside the European Economic Area (EEA), such as India or the USA.
- If we do this, we put adequate safeguards in place to ensure your data receives the same protection as if it were being processed inside the EEA. If you wish for more information about how your data may be processed outside the EEA, please contact our Data Protection Officer.

8. More about Credit Reference Agencies ("CRA"s)

When you become liable for services, we may:

- a) Check our own records for information on:
 - i) any previous accounts you may have had with us;
 - ii) and, if they have one, any previous accounts anyone jointly liable for payments have had with us;
 - iii) if you are an owner, director or partner in a small business, we may also check on your business.
- b) Search at a CRA for information on:
 - i) your personal accounts;
 - ii) and, if you advise us that you have a spouse or partner who is jointly liable for payment or with whom you have any of the following with other organisations, we will check their personal accounts as well;
 - previously made joint applications;
 - existing joint account(s);
 - financial links;

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- iii) if you are a director or partner in a small business we may also check on your business.
- c) Search at a Fraud Prevention Agency for information on you and any addresses at which you have lived, and on your business (if you have one).

CRA's will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

What we do with your information when you first become liable to pay for our services:

- a) We will supply your personal data to CRA's.
- b) If you inform us that you have a spouse or partner who is jointly liable for payment, we will:
 - i) search and/or record information at a CRA about you both;
 - ii) take both your and their information into consideration when managing the account in future;
 - iii) continue this linking until the account closes, or is changed to a sole account and one of you notifies us that you are no longer linked.

So you must be sure that you have their agreement to disclose information about them.

- c) If you give us false or inaccurate information and we suspect or identify fraud, we will record this. We may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

How we use the information we receive from fraud prevention agencies and CRA's, both when you first open an account and on an on-going basis:

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- a) Assess your account and decide what payment terms would best suit your circumstances.
- b) Verify your identity and the identity of anybody named as being jointly liable on the account or other directors/partners.
- c) Undertake checks for the prevention and detection of crime, fraud and/or money laundering.
- d) Use scoring methods to assess how to manage our future relationship.
- e) Manage your account
- f) Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.

What we do when you have an account:

- a) If you owe us money and do not repay in accordance with our payment terms we will notify you of our intention to file a default and if still unpaid after 28 days we will inform the CRAs.
- b) We will give details of your settled, paid account to CRAs to assist in the building of your credit rating.
- c) We may make periodic searches of our own records and at a CRA to manage your account with us, including whether to review your existing payment methods or recover monies due to us. We may also check at a Fraud Prevention Agencies to prevent or detect fraud.
- d) If you have used our services, vacate premises and do not make payments that you owe us, we will trace your whereabouts and recover debts.

What CRAs and fraud prevention agencies do:

When you first become liable for charges for our services, the CRA will supply us with:

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- a) Credit information such as previous applications and the conduct of the accounts in your name and/or your business accounts (if you have one) and also for anyone who is jointly liable with you.
- b) Public information such as County Court Judgments (CCJs) and bankruptcies.
- c) Electoral Register information.
- d) Fraud prevention information.

When information about your account(s) is supplied by us to a CRA:

- a) A CRA will record the details that are supplied on your personal and/or business account (if you have one). This will include any previous and subsequent names that have been used by the account holders and how you/they manage the accounts.
- a) If you owe us money and do not repay in accordance with our payment terms, the CRA will record the missed or overdue payments and/or default. We will use the information held by CRAs to trace your whereabouts.
- b) Missed payments can be seen by other organisations. Similar to defaults, they may be used to make decisions about your applications for credit or other financial services.
- c) Records shared with CRAs remain on file for 6 years after they are closed, whether settled by you or defaulted.

How your data will not be used by a CRA:

- a) It will not be used to create a blacklist.
- b) It will not be used to create marketing lists.

How your data will be used by a CRA:

The information which we and other organisations provide to the CRAs about you, those who are jointly liable for our services with you, and your business (if you have one) may be supplied by CRAs to other organisations and used by them to:

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- b) Prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities.
- c) Check the operation of credit and credit-related accounts.
- d) Verify your identity.
- e) Make decisions on credit and credit related services about you, your partner, and other members of your household or your business.
- f) Manage credit or credit related accounts or other facilities.
- g) Trace the whereabouts of individuals and recover debts that are owed.
- h) Undertake statistical analysis and system testing.

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How your data may be used by fraud prevention agencies:

- a) The information which we and others provide to the fraud prevention agencies about you, those who are jointly liable for our services with you and your business (if you have one) may be supplied by fraud prevention agencies to other organisations and used by them and us to:
 - i) prevent crime, fraud and money laundering by, for example;
 - ii) checking details provided on applications for credit and credit related or other facilities;
 - iii) managing credit and credit related accounts or facilities;
 - iv) cross checking details provided on proposals and claims for all types of insurance;
 - v) checking details on applications for jobs or when checked as part of employment.
- b) Verify their identity, if an individual applies for other facilities including all types of insurance proposals and claims.
- c) Trace whereabouts of individuals and recover debts that are owed.
- d) Conduct other checks to prevent or detect fraud.
- e) We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.
- f) Undertake statistical analysis and system testing.

CRA's will share your information with other organisations.

The identities of the CRA's, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRA's are explained in more detail in the Credit Reference Agency Information Notice (CRAIN) at [<https://www.experian.co.uk/legal/crain/>]. CRAIN is also accessible from each of the

three CRAs – clicking on any of these three links will also take you to the same CRAIN document:

Callcredit [<http://www.callcredit.co.uk/crain>];

Equifax [<http://www.equifax.co.uk/crain>];

Experian [<http://www.experian.co.uk/crain>].

9. Profiling and Automated Decision Making

Automated decision making involves making decisions using your personal data without manual intervention. We use automated decision making to make decisions on how we recover debts. This is based on a profiled risk score provided by the CRA. We use the score to assess the likelihood of a customer being able to repay their debt. Risk scores are also used to determine which payment terms are most appropriate to any particular situation.

We also buy profiled information which we use with personal data to:

- Select customers to take part in surveys.
- Predict customer satisfaction scores. (We use profiled information in this way to decide who to contact for feedback as well as to help us understand how to manage customer service cases.)
- Identify the best means of communicating with you.
- Identify if you may be eligible for social tariffs.
- Target assistance, such as affordability schemes.

All of this activity is necessary for our legitimate interest in:

- Recovering Debts,
- Lending Responsibly,
- Providing Service,
- Service Improvement, and
- Managing Our Business.

(See Section 5 above for more information about our legitimate interests).

10. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

11. Our Website

Our website lets you have full control over the personal data stored regarding your browsing activity.

12. What are your rights over your personal data?

You have a number of rights in relation to the personal data that we hold about you. Specifically, you can:

- ask for a copy of that information, free of charge in most cases.
- ask for information about how we process your data.
- ask us to change it if it's wrong.
- ask us, in certain circumstances, for the data to be removed from our records.
- in some circumstances you can ask us to stop processing your data.
- in some circumstances, ask for your data to be given to you in a format that you can use to transfer to another organisation.
- object to certain types of processing of your data, such as direct marketing which you can object to and stop at any time. You can object to processing carried out on legitimate interests grounds, including profiling, and we will provide you with our reasons for that processing. If you do not agree with those reasons, you can refer the matter to the Information Commissioner's Office

If we refuse your request under the above rights, we will tell you why. You have the right to complain as outlined in section 14 below.

All of the above requests may, where necessary, be forwarded on to any third party we use (see section 7 above) in the processing of your personal data.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make in the exercise of your data protection rights. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you want to exercise your rights, please contact Customer Services by:

Writing to us at:
Anglian Water
PO Box 4994
LANCING
BN11 9AL

Or Emailing us at anglianwatercustomerservices@anglianwater.co.uk

Alternatively you can phone our call centre on 03457 919 155

If we are unable to action your request we will explain to you our reasons.

Where we need your consent to process your personal information you may withdraw your consent at any time by contacting customer services by phone or by email as detailed above.

13. Direct Marketing

Anglian Water does not use direct marketing to sell its core services. However, we may want to contact you in relation to additional services such as water efficiency services. We may also want to provide you with marketing information from carefully selected third parties, such as Wateraid or Homeserve.

If you contact our call centre, we will offer you the opportunity to talk to Homeserve about their products, unless you already have a policy with them or have indicated that you are not interested.

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must and will always comply with your request.

If you want to stop direct marketing communications from us:

Call us on 03457 919 155 and tell us that you no longer wish to receive direct marketing from us.

Alternatively, you can email us at anglianwatercustomerservices@anglianwater.co.uk

If you have an online account with us, log in into your My Account, visit the 'My Profile' area and change your preferences.

Write to us at:

Anglian Water

PO Box 4994

LANCING

BN11 9AL

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

14. Complaints

You may complain to our Data Protection Officer about how your personal data is being processed using the contact information in section 2 above.

You can also complain to the Information Commissioner's Office by phone on 0303 123 1113, online at www.ico.org.uk or by writing to them:

Information Commissioner's Office,

Wycliffe House,

Water Lane,

Wilmslow,

SK9 5AF

15. Your Responsibilities

You need to tell us when you are no longer liable to pay for our services. This could be, for example, because you have moved house, or it could be due to a change to the individuals who are jointly liable with you. If you don't tell us, it could result in incorrect data being processed, shared and used by CRAs, which in turn, may affect how other organisations view your creditworthiness.

16. Any Questions

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and how you can control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

You may write to us at:

Data Protection Officer, Legal Services
Anglian Water Services Ltd
Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
PE29 6XU

Or Email us at DPO@anglianwater.co.uk

Alternatively you can phone our call centre on 03457 919 155