

Smart Metering – Customer Information Notice

This notice explains how we use smart meters and how we collect and use information from them. It should be read alongside our main [Privacy Notice](#), which provides further detail about how we handle personal data and your rights.

Introduction

We are rolling out smart metering technology across our network to improve the way we deliver services to our customers. Smart meters allow us to understand water usage more accurately and efficiently, helping us to bill correctly, identify potential issues such as leaks, and manage water resources more effectively.

We recognise that information collected through smart meters may, in some circumstances, relate to you or your property in a way that constitutes personal data. We are committed to ensuring that such information is handled transparently, securely, and in accordance with data protection law.

What is a smart meter and how does it work

A smart meter is a device installed at your property which records water usage and automatically transmits readings to us using secure communications technology. This removes the need for manual meter readings and allows us to access up-to-date information about water consumption.

Depending on the type of meter installed, readings may be collected at periodic intervals rather than on a continuous basis. The configuration of the meter will determine the level of detail and frequency of the data collected, and we ensure this is proportionate to the purposes for which the data is used.

Information we collect from smart meters

Smart meters record information about water usage at a property. This typically includes the volume of water consumed over a period of time, together with associated information such as the date and time of readings and the operational status of the meter.

We may also process technical information relating to the meter itself, including identifiers, connectivity data, performance information, and system alerts indicating potential issues with the meter or supply. This enables us to operate and maintain the metering system effectively.

While this information primarily relates to a property, it may in certain circumstances be linked to an individual account holder and therefore treated as personal data under applicable law, particularly where patterns of usage could be associated with identifiable individuals.

We do not seek to use smart meter data to monitor individual behaviour, and we do not collect information beyond what is necessary to operate our services and meet our obligations.

How we use smart meter data

We use information collected from smart meters for a number of important purposes connected with the provision of water services.

In future, we plan to use the data to ensure that customers are billed accurately based on actual consumption, which will reduce the need for estimated reads. This reduces the likelihood of billing disputes and ensures fairness in charging.

We also use the data to identify potential issues, such as leaks or unusual consumption patterns, which may indicate a problem either within a property or across the wider network. This allows us to take appropriate action, including notifying customers where necessary.

We may also use smart meter data to support the accurate administration of customer accounts, including helping us identify where account details may need to be updated and where properties may appear to be unoccupied or responsibility for charges may have changed.

In doing so, smart meter data may be processed using automated means to identify patterns or anomalies in usage, such as potential leaks, unexpected consumption, or other issues affecting the supply or the meter. However, we do not use this data to make decisions about you solely by automated means where those decisions would have a legal or similarly significant effect. Any action we take in response to such insights will involve appropriate review and oversight.

At a broader level, smart meter data supports the effective management of the water network. By understanding patterns of demand, we can plan infrastructure, allocate resources, and improve resilience. This is particularly important in managing water sustainably and meeting our regulatory responsibilities.

In addition, we may use aggregated and anonymised data derived from smart meters for analysis, forecasting, and service improvement. Where data is used in this way, it is no longer identifiable to individuals.

We will not use smart meter data for purposes that would be unexpected, intrusive, or incompatible with the purposes described in this notice.

Our legal basis for processing

As a statutory water undertaker, we process smart meter data as part of carrying out our legal duties to provide and manage water services. This includes functions such as measuring consumption, maintaining accurate billing, managing the network, detecting leaks, and planning for future demand.



The primary basis on which we process this data is that it is necessary to comply with legal obligations and to perform tasks carried out in the public interest, or in the exercise of official authority vested in us.

In addition, we may process smart meter data where this is necessary for our legitimate interests in operating, maintaining, and improving the efficiency, resilience, and security of our services, including protecting the integrity of our systems and reducing water loss. In doing so, we take care to ensure that our interests are balanced against your rights and expectations.

We do not generally rely on consent as a basis for processing smart meter data, as the use of such data is inherent to the way in which we deliver water services and meet our statutory responsibilities.

Sharing your information

We may share smart meter data where this is necessary to support the delivery, operation, and regulation of our services.

This includes sharing information with third parties who act on our behalf, such as contractors responsible for installing and maintaining meters, and service providers who host or process data to support our systems. In these cases, such parties are required to act only on our instructions and to apply appropriate security measures to protect the data.

As a statutory water undertaker, we may also be required to disclose information to regulators, public authorities, or other bodies where this is necessary to comply with our legal obligations or to support the exercise of statutory functions. This may include, for example, disclosures to Ofwat, the Drinking Water Inspectorate, the Environment Agency, local authorities, or other relevant bodies involved in the regulation and oversight of water services.

We may also share information where this is necessary for the effective administration of water services, including with organisations involved in the wider water sector where required for operational or regulatory purposes. This may include, where relevant, market operators or industry bodies involved in market governance or data management.

In certain circumstances, we may share information to support activities such as research, planning, or service improvement, including with third parties acting on our behalf or in collaboration with us. Where this occurs, we take steps to ensure that data is used appropriately and, where possible, does not identify individual customers.

We may also share information where this is necessary to prevent or detect crime, including fraud or unlawful use of water, or where disclosure is otherwise required or permitted by law.

Where we share data with third parties acting on our behalf, we ensure appropriate contractual, security, and governance measures are in place. Where we disclose data in response to legal or

regulatory requirements, we ensure that such disclosures are limited to what is necessary and proportionate.

Data security

We take the security of smart meter data seriously and ensure that appropriate technical and organisational measures are in place to protect it throughout its lifecycle, from collection at the meter through to storage and use within our systems.

Smart meter data is collected and transmitted using systems and networks designed to support the secure handling of information and to reduce the risk of unauthorised access or interception. Within our systems, access to data is controlled and restricted to those who require it for legitimate business purposes.

We have processes in place to monitor, manage and respond to potential security risks or incidents, and we keep these arrangements under review to ensure they remain appropriate.

Where third parties support the provision of smart metering services, we require them to meet appropriate security standards and to handle data in accordance with applicable legal and regulatory requirements. This includes appropriate oversight and incident management arrangements.

We keep our security measures under regular review to ensure they remain appropriate to the nature of the data and the risks involved, including evolving threats and changes in technology.

International transfers

Smart meter data is primarily processed within the United Kingdom and the European Economic Area.

In some circumstances, it may be necessary for us or our service providers to transfer or access data outside these locations, for example where systems or support services are provided on a global basis.

Where this occurs, we ensure that appropriate safeguards are in place to protect your information in accordance with data protection law.

How long we keep smart meter data

We retain smart meter data only for as long as necessary to fulfil the purposes for which it was collected. This includes maintaining accurate billing records, complying with legal and regulatory requirements, and resolving any disputes.

Retention periods are determined in line with our Data Retention Policy, which takes account of business need, legal obligations, and good industry practice. Data that is no longer required is securely deleted or anonymised.

Moving home

If you are moving into or out of a property with a smart meter, it is important that you tell us as soon as possible. This helps us ensure that your account details are accurate, that responsibility for charges is recorded correctly, and that bills are issued to the right person for the right period.

Where a property is metered, you should provide the relevant details about your move, including the date you are leaving or taking responsibility for the property and, where requested, a meter reading or any other information reasonably needed to update our records. If you do not tell us that you are moving, this may delay the closing or transfer of your account and may affect the accuracy of billing and occupancy records.

Your rights

You have rights in relation to your personal data, including the right to request access to the data we hold about you and to request that inaccurate data is corrected.

In certain circumstances, you may also have the right to object to particular types of processing or to request that processing is restricted, although these rights may be subject to limitations where the data is required for the provision of our services or to meet legal obligations.

Further information about your rights and how to exercise them is set out in our Privacy Notice.

Further information and complaints

If you would like more information about smart metering or how we use your data, or if you have any concerns, you can contact us using the details provided in our [Privacy Notice](#).

We take concerns about data protection seriously and will investigate and respond to complaints in accordance with our established procedures.