



DOING THE RIGHT THING

GROUP DATA PROTECTION POLICY

Protecting our customer
and employee personal data

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SEVERN
TRENT

DOING THE RIGHT THING FOR PERSONAL DATA

Doing the Right Thing helps us understand how we can put our core values into practice every day. It's for all of us and represents our minimum standards and expectations.

By Doing the Right Thing every day, we can protect our reputation, our people, and all of those who work with us to help deliver on our commitments to:

- Build public trust
- Live our values every day
- Comply with laws, regulation and our standards
- Not tolerate illegal or unethical acts
- Treat everyone fairly (including our people, customers and suppliers)
- Be a responsible and sustainable company
- Create an inclusive environment
- Give our people confidence to Speak Up if they see things that are not quite right.

Our Group Policies support Doing the Right Thing and can be found [HERE](#).



WE MUST PROTECT OUR CUSTOMER AND EMPLOYEE PERSONAL DATA

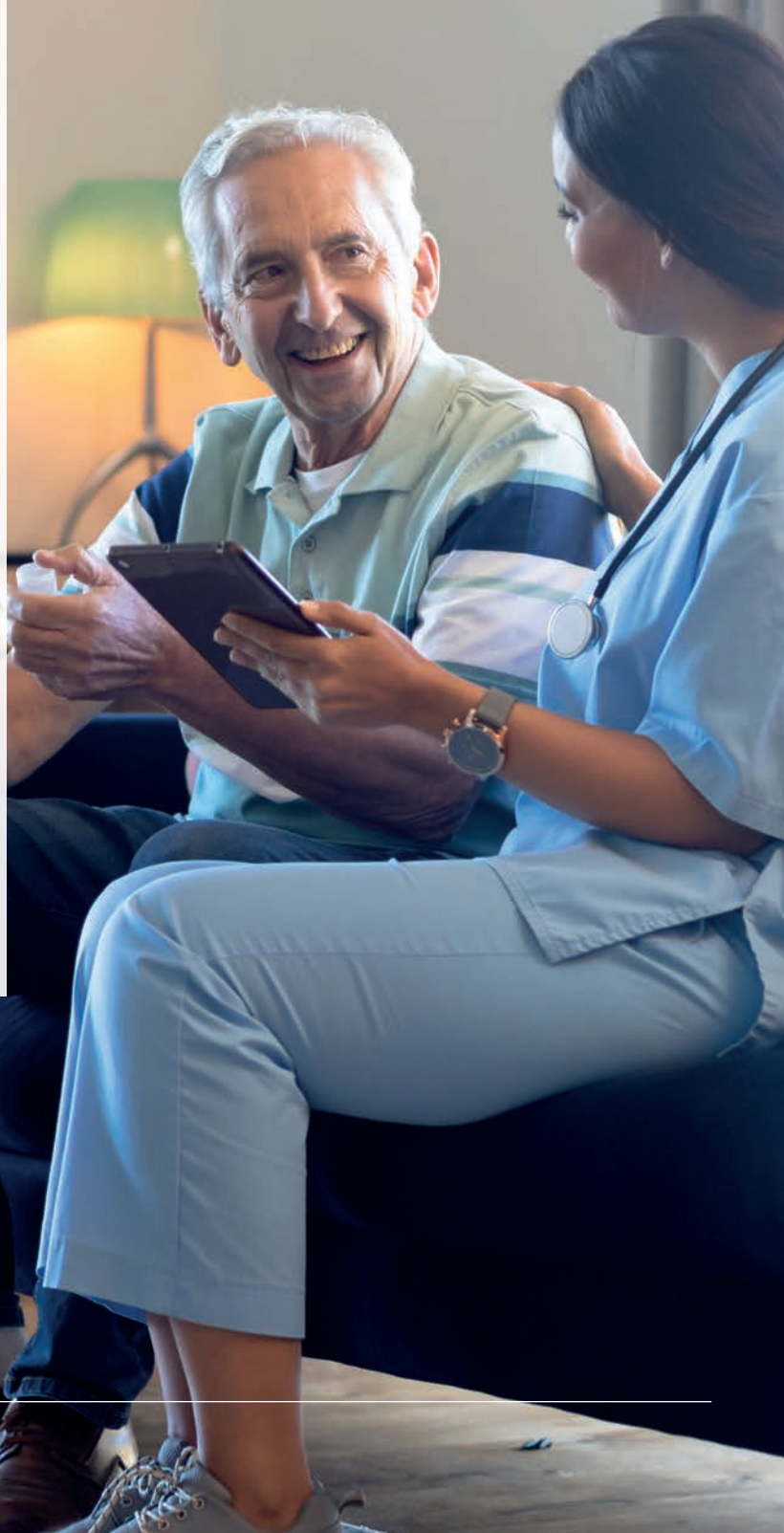
Everyone is entitled to privacy and that means handling everyone's personal data in the right way.

UK General Data Protection Regulation (UK GDPR) evolves from the Data Protection Act 1998 (DPA) to protect personal information in the computer age. UK GDPR has a wide scope and places compliance obligations on Data Controllers and strengthens the rights for customers and employees. Severn Trent collects, stores and processes personal data about our employees, customers, suppliers and other third parties. We recognise that the correct and lawful treatment of this personal data will maintain confidence in the organisation and will provide for successful business operations.

This policy should help you recognise what may be personal data; as well as your rights and obligations with respect to such data.

Scope

Our Group Data Protection Policy applies to you if you are employed by, or carry out work on behalf of Severn Trent Plc and extends to any Severn Trent group company, employees, contractors, temporary employees and agency workers.



OUR POLICY

What is personal data?

Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour (for example, employee appraisals or customer rating).

Special category data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition and sex life or sexual preference.

When special categories of personal data are being processed, additional conditions must be met and typically we must either obtain the explicit consent of the data subject to record, use and store that data or be required to process such special categories of personal data to comply with our legal obligations or be in the public interest.

Criminal allegations or offences are subject to the same additional conditions as special categories of data.

Lawful Basis for Processing

Under Article 6 of UK GDPR, we are only allowed to process personal data on the basis of one of the following legal grounds:

- **Legal obligation** – To comply with a legal obligation to which Severn Trent is subject;
- **Performance of contract** – the processing is necessary for entering into or for the performance of a contract with the data subject;
- **Public task** – to perform a specific task in the public interest that is set out in law;
- **Legitimate interest** – for the legitimate interest of Severn Trent or the party to whom the personal data is disclosed; or
- **Vital interest** – for the vital interest of our customers or employees;
- **Consent** – the data subject's consents to the processing.



OUR POLICY [CONT.]

When we process personal data, we should adhere to the six key principles of UK GDPR...

Lawfulness, fairness and transparency

- We will process personal data lawfully, fairly and transparently

Purpose Limitation

- We will only use data for specific purposes which individuals have been made aware of

Data Minimisation

- We will only hold the minimum amount of personal data required for our processing purposes

Data Accuracy

- We will keep personal data we hold accurate and up-to-date

Data Retention

- We will not hold personal data we no longer require

Data Security

- We will hold personal data securely and protect it against misuse, loss or damage

The Accountability Principle

In addition, we also ensure that we take responsibility for what we, our group and contract partners do with personal data by:

- Adopting and implementing data protection policies;
- Taking a 'data protection by design and default' approach as defined by UK GDPR;
- Putting written contracts in place with organisations that process personal data on your behalf;
- Implementing appropriate technical and security measures;
- Recording and, where necessary, reporting personal data breaches;
- Carrying out data protection impact assessments for uses of personal data that are likely to result in high risk to individuals' interests;



OUR CUSTOMERS' AND EMPLOYEES' RIGHTS

- **Right of access** - You have the right to ask us for copies of your personal information.
- **Right to rectification** - You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.
- **Right to erasure** - You can request the deletion or removal of personal data where there is no reason for its continued processing. This right is also known as the "Right to be Forgotten".
- **Right to be informed** - You can ask for details of how we process your personal data, as covered by our Privacy Notice.
- **Right to object to processing** - You can request that your personal data is not processed for specific purposes such as direct marketing.
- **Right to restriction of processing** - You can request that no further processing of the personal data we have previously collected occurs.
- **Your right to data portability** - In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.

For more details on how to exercise your rights please see the appropriate privacy notice as detailed in our helpful resources section.



OUR RESPONSIBILITIES

Our employees' responsibility

We are all responsible for protecting our employee and customer data in our roles. Employees need to consider and implement the commitments made in our Group Data Protection Policy when performing your work activities and when making decisions.

Our leaders

Our leaders are responsible for making proper arrangements within their business areas to ensure compliance with this Group Data Protection Policy.

STEC

The Severn Trent Executive Committee of Severn Trent Plc Board provides regular oversight of this policy.

If you have a question or a concern about this policy or any security matter, you can contact the Data Protection Officer via email dataprotection@severntrent.co.uk or post DPO, 2 St John's Street, Coventry, CV1 2LZ.

HELPFUL RESOURCES

[Doing the Right Thing guide](#)

[Customer privacy policy STW](#)

[Customer privacy policy HD](#)

[Customer Privacy policy](#)

[Severn Trent PLC](#)

[ST Greenpower](#)

[ST SEARCHES](#)

[ST Services](#)

Employees should refer to our colleague privacy promise available on our internal intranet.

A woman with long brown hair is sitting at a desk, looking down at a laptop. She is holding a credit card in her left hand and has her chin resting on it. A white coffee cup with a black lid is on the desk next to the laptop. The background is dark and out of focus.

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