

GROUP DATA PROTECTION POLICY

**Conducting business
the right way**

**Safeguarding our customer and employee personal
data**

Version 2 [May 2018]



CONDUCTING BUSINESS THE RIGHT WAY

Our Values, Doing the Right Thing and Group Policies

Our purpose is to serve our communities and build a lasting water legacy. Our vision is to be the most trusted water company. Our Values, our Doing the Right Thing code and our Group Policies are the foundation for how we operate to achieve our purpose and to become the most trusted water company. They help us to make the right decisions, and provide guidance where needed.

Acting with Integrity is one of our Core Values, and we must never compromise it.

Your Commitment to this Policy

- To conduct yourself with Integrity and comply with the law
- Recognise that your decisions have an impact on others - have high standards
- Unequivocally expect responsible and ethical decisions from others
- Speak up if you observe behaviours that are not consistent with our Values
- Tirelessly adhere to our Value of Acting with Integrity

Our values

- We put our **customers first**
- We are **passionate** about what we do
- We act with **integrity**
- We protect our **environment**
- We are inspired to create an **awesome company**

INTRODUCTION

We must safeguard our customer and employee personal data

Everyone has rights about the way in which their personal data is handled. 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 employee and agency workers.

POLICY

We will:

- comply with six enforceable principles set out in the General Data Protection Regulation (GDPR) when processing personal data. Therefore in relation to personal data it will be:
- Processed lawfully, fairly and transparently;
- Processed for specific purposes which individuals have been made aware of
- Adequate and necessary, the minimum required for the purpose;
- Accurate, and kept up to date;
- Not kept longer than necessary for the purpose ; and
- Securely held and protected against misuse, loss or damage.

For personal data to be processed lawfully, it must be processed on the basis of one of the following legal grounds:

- The data subject's consent to the processing;
- That the processing is necessary for entering in to or for the performance of a contract with the data subject;
- For the compliance with a legal obligation to which Severn Trent (the data controller) is subject;
- For the legitimate interest of Severn Trent or the party to whom the personal data is disclosed; or
- For the vital interest of our customers.

What is 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, 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, sex life or sexual preference, criminal allegations or offences.

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.

POLICY

employee and customers have the following rights in relation to their personal data:

- They can request access to any personal data held about them by a data controller.
- Prevent the processing of their personal data for direct marketing purposes.
- Ask to have inaccurate personal data amended.
- Prevent processing that is likely to cause damage or distress to data subjects or anyone else.

Remember:

If we collect personal data directly from data subjects we must inform them about:

- The purpose or purposes for which we intend to process that personal data.
- The types of third parties, if any, with whom we will share or disclose their personal data.
- The means, if any, with which data subjects can limit our use and disclosure of their personal data.

When handling our employee or customer data we will:

- Only use personal data for the specific purposes communicated to our employee and/or customers.
- Ensure that personal data we hold is accurate and kept up to date. We must check the accuracy of any personal data at the point of collection and, where we can, at regular intervals afterwards. We must destroy or amend inaccurate or out-of-date personal data.
- Not keep personal data longer than required for the purpose for which it was collected.
- Apply security measures to ensure no unlawful or unauthorised processing of personal data, or the accidental loss or damage to personal data.
- When contracting with suppliers and/or transferring personal data outside the EEA take appropriate steps to ensure that there is adequate protection in place.

Further Information:

- Please refer to the **Data Protection Standard** for further information

OUR RESPONSIBILITIES



DOING THE RIGHT THING

Your Responsibility

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

Leaders

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.

REPORTING CONCERNS

Information about this policy and relevant guidelines are communicated through our internal communication channels

I have a
concern!

Should you have a concern about any data protection issues, this should be reported through your line manager. Alternatively, **concerns may be raised** with any of the following group senior executives: the CEO, HR Director, Chief Data Officer, General Counsel or through our confidential and independent whistleblowing helpline. Please refer to our 'Speak Up' policy.

Severn Trent's
commitments

Severn Trent are committed to handling customer and employee personal data in a secure and compliant way. Individuals who raise concerns are sometimes worried about possible repercussions. We are **committed** to ensuring that **no one suffers any detrimental treatment** as a result of raising a concern. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

I have a
question?

If you have a question about this policy or any security matter, you can contact your Data Owner, Data Steward or the Chief Data Officer (dataprotection@severntrent.co.uk)