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# Customer Privacy Notice NPG Framework, Southern Water & South East Water

**July 2024**

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Version No	Date Issued	Update Details	Owner	Approved By	Policy Number
V0.1	March 2024	First Draft	Head of Internal Investigations	The Board	POL 049
v1.0	June 2024	Policy finalised following revision and review of draft, with amendments	Head of Internal Investigations	The Board	POL 049

## Customer Privacy Notice NPG Framework (“NPG”), Southern Water (“SW”) & South East Water (“SEW”)

Clancy Group Holdings Limited and its associated companies The Clancy Group Limited, Clancy Plant Limited and Clancy Docwra Limited (“Clancy” or “we”) are committed to protecting your personal information, as well as being transparent about the personal information collected, obtained and disclosed about you.

### Notice

This Privacy Notice (“Notice”) will inform you as to how we look after your personal data during the course of your interaction with Clancy and to ensure that all of our data protection obligations are met. This Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of the United Kingdom. This Notice also describes your rights regarding your personal data. We will only process your personal data in accordance with this Notice unless otherwise required by applicable law.

This Notice is reviewed annually by our GDPR & DPA Compliance Officer (“DPCO”) or nominated person and will be monitored for compliance by the DPCO, and line managers/supervisors within their own area of responsibility. Routine audits will be carried out annually and may also include random and scheduled inspections by the DPCO. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact our DPCO using the details set out below.

This Notice does not form part of any contract of employment, and we may amend it at any time.

Controller: This Notice is issued on behalf of the Clancy Group, so when we mention “Clancy”, “we”, “us” or “our” in this Notice, we are referring to the relevant company in the Clancy Group responsible for processing your data.

### Who does this Notice apply to?

This Notice applies to members of the public who are residential or business customers of our clients NPG Framework, Southern Water or South East Water and whose properties may be affected by work carried out by Clancy on behalf of our clients (referred to as “you” in this Notice).

### The data we collect about you

We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Notice.

You may share your personal data with us for a variety of reasons. We use different methods to collect data from and about you including through Direct interactions with you, customer data supplied by our clients NPG Framework, Southern Water or South East Water, or by corresponding with us by post, phone, email or otherwise.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous

data). We may collect, use, store and transfer the following different kinds of personal data about you in connection with your relationship with us:

- Name, home address, contact details including mobile, email address, photographs of the exterior of the property and the gardens where work may be taking place.

### Use of your personal data including our lawful bases for processing personal information

We will only use your personal data when the law allows us to. We will use your personal data to process enable site visits to your property to undertake work instructed by our clients.

Our lawful bases for processing your personal data are:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where it is necessary for the performance of your contract with our clients NPG, SW and SEW (e.g., where we are requested to visit your property by our partners which provide you with a service).

We may process your personal data without your knowledge or consent where required by applicable law or regulation. Where we have relied on legitimate interests as the lawful basis for processing personal data, we have ensured that your privacy rights and freedoms are not overridden.

Where you have given your explicit consent to your utility provider or to Clancy directly that we may process special category data about you (e.g., we are informed about any health condition prior to site visits and this data is provided directly from you to us or our client) is our lawful basis for processing any special category data.

We may also process your personal data for our own legitimate interests, including to prevent or detect crime, e.g., fraud.

You will not be subject to decisions by Clancy based on automated data processing without your prior consent.

### Collection and use of special categories of personal data

Special categories of personal data include details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

We may collect some health or disability data about you when you volunteer it, however we collect this information rarely. This is likely to be where our work on site could impact on your health - e.g., where a constant electricity supply is needed for medical equipment. This would constitute special categories of personal data.

Where we have a legitimate need to process special categories of personal data for purposes not identified in the section below, we will only do so after providing you with notice and, if required by law, obtaining your prior, explicit consent.

### Who we share your personal data with externally

We will only disclose your personal data to third parties where required by law or to our contractors, designated agents, or third-party service providers who require such information to assist us with administering the relationship with you.

The recipient third parties are:

- Our clients NPG, Southern Water and South East Water;
- Depotnet, our job management software provider; and
- Our subcontractors who may need to visit the site (your property).

### Data security

We take data protection seriously, and as such, we have internal policies/procedures (such as Data Protection Policy, Data Breach and Incident Management Policy, and Records Management Policy). We maintain operational, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We will store your personal data securely in a number of locations, including on Clancy sites and IT systems (including email and servers). The data of the server log files are stored separately from any personal data provided by users. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

We take your privacy very seriously and will never sell your data.

### International transfers of personal information

We do not send any of your personal data outside of the UK.

### Data retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

### Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy
- Where our use of the data is unlawful, but you do not want us to erase it
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and or
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request the transfer** of your personal data to you or to a third party (data portability). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact the DPCO at [Roland.Thomas@theclancygroup.co.uk](mailto:Roland.Thomas@theclancygroup.co.uk)

You will not have to pay a fee to access your personal data (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 could refuse to comply with your request in these circumstances.

If you wish to exercise your rights and it relates to personal information you provided to another organisation that contracted with Clancy for Clancy to provide services to you then you must exercise your rights directly with that organisation.

### What we may need from you

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

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

### Changes to this Notice and your duty to inform us of changes

We reserve the right to update this Notice at any time, and we will provide you with a new Notice when we make any updates. If we would like to use your previously collected personal data for



different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We keep this Notice under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### Contact details

If you have any questions about this Notice or how we handle your personal data, or would like to request access to your personal data, please contact our DPCO:

**Roland Thomas at: [roland.thomas@theclancygroup.co.uk](mailto:roland.thomas@theclancygroup.co.uk)**

If you are unsatisfied with our response to any issues that you raise with us, you may have the right to make a complaint with to the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline Number: 0303 123 1113