Keele University Utilities Privacy Notice

This document is relevant to occupiers of properties on the Keele University campus where we supply energy and/or water to your home.

Your Personal Data

It's important to us that you can be confident that we are handling your personal data responsibly and appropriately. This document serves to explain how we collect your data, why we collect it and how we keep it protected. We are aiming within this document to explain to you in particular:

- Why we need your personal data
- Who we might share that data with and why
- The rights that you have under data protection laws

We will never use your details for marketing or sell your data to third parties.

What sort of data we hold about you

We collect the following types of personal data:

- Your contact details:
    - Details that allow us to contact you directly such as name, email address, telephone number and addresses associated with your account.
- Account information and details of other people linked to your account:
    - Tariff details, physical meter details, details of persons that have been nominated to carry out account functions on your behalf. We may hold details including age, gender, and details of your household including property type and number of occupants. We may also keep information regarding engineer appointments and issues that you may have had with the supply of utilities to your property.
- Energy consumption data:
    - We will obtain energy consumption data and meter readings either by direct manual reading or through meters capable of sending this data remotely (through 'smart meters'). This data is used not only so that we can issue correct bills but also to allow us to manage our energy networks effectively.
- Vulnerability information:
    - If you or a person linked to your account has asked to be on our Priority Services Register, we may keep information regarding personal health and disability.
- Financial information:
    - We may keep information that allows us to carry out the necessary functions to administer your account. These may include previous payments, current and historic payment schedule, payment details (including bank details in some instances) and employee information where payment is linked to your salary.
- Records of communications:
    - Copies of direct communications including phone calls, emails, letters etc. and potentially notes of communications such as phone calls or direct interactions.

What we are using your personal data for

The information that we keep is used for the following purposes, grouped by the lawful basis for processing as specified within GDPR legislation:

Necessary to facilitate our contract to deliver services:

- To provide our services to you and to maintain your account
- To take payment for energy or water supplies
- To deliver service communications when required
- To answer your complaints or queries

Necessary for us to comply with the law:

- To provide you information regarding your energy and water consumption
- To respond to emergency situations (including gas leaks)
- To comply with government obligations and license conditions
- To provide enhanced services to vulnerable customers

Necessary for a legitimate interest of the University:

- To raise awareness of energy and water savings
- To maintain and improve our systems, services and networks (e.g. quality assurance, network management)
- To develop new products and services and to determine which are relevant to you

Where we process sensitive personal data (for example where you have given us information to be on our Priority Services Register) we will do so where it is necessary, in the public interest, to process the information for the purposes of safeguarding of individuals at risk; or in the area of social protection.

We may anonymise and aggregate the energy and water consumption data we hold (so that it does not identify you either directly or indirectly). We use this anonymised data (particularly smart meter data) to understand energy consumption trends and to ensure that our systems operate safely and effectively.

In certain instances we will ask for your permission to process your data where we do not have a legitimate interest to. An example of this may be where we seek to collect enhanced information of your property or service beyond that typically required to run our energy and water networks (for instance the type of boiler you have). We will never do this without your express permission and you will retain the ability to revoke your consent at any point.

In addition to this, we may contact you from time to time to seek your views and/or invite you to participate in research projects. Contact will always come direct from Keele University as part of our

public task as a research university. Full details of any proposed research project which you may be invited to participate in will be given at the time.

Where do we keep this information?
Your information is stored in several different places:

- On the University's secure computer systems (Microsoft OneDrive, Z drive)
- On the University email providers secure systems (Microsoft)
- Smart meter consumption data is held on secure systems operated by our third party partners and suppliers, and within the EU boundary's
- Water meter data is held on secure servers operated by a third party within the EU boundary and to ISO:27001 certified standards
- Where present, hard copies of your information are stored securely within University buildings

How long do we keep your information for?
Personal data related to your account may be kept for no longer than necessary after termination of your account with us, unless there is a legal requirement for us to retain it longer.
Where we have collected anonymous and aggregated usage data this may be kept for longer.
Details of the retention of data in any research project will be communicated to you if you decide to participate in any such project.

Who we share this information with
In order for us to provide our products and services to you, it is necessary for us to share information with third parties. For some third parties we need to share your personal data because they provide a service which we do not provide. For others, we may need to share your data for regulatory requirements or to allow for effective emergency responses. Whenever we share data, we only share the amount necessary to achieve the objective of the sharing. Examples of third parties that we share data with include:

Who	Examples
Meter Reading Partners	Morrison Data Services
Meter Installation Partners	Siemens PLC, North Staffs Pipe Services.
Smart Meter Data Collectors	Siemens PLC, Temetra Ltd, Hildebrand
Service Contractors	Midlands Power Networks, Shores Mechanical Services, Curry & Bevans, Wave Utilities, Demeter Ltd, BEC(BMS)
Government Regulators	The Office of Gas and Electricity Markets (OFGEM)
Energy & Water network operators	Western Power Distribution (Electricity) Cadent (Gas) Severn Trent (Water)
Emergency Services	Police Fire Service Ambulance

Your rights in relation to your data

Full details of your rights in relation to your personal data and how you can exercise them can be found at: https://www.keele.ac.uk/informationgovernance/yourdata-yourrights/

Getting in touch

If you have any concerns about how your data is processed, you can contact *Estate & Campus Services* Service Desk in the first instance either by email to *estates@keele.ac.uk* or by telephone on *01782 733467*. If that does not resolve your issue or you wish to make a complaint you can also contact Keele's Data Protection Officer at *dpo@keele.ac.uk* or the Information Commissioner's Office (ICO) (www.ico.org.uk)

DOCUMENT CONTROL INFORMATION

Document Name	Energy Privacy Policy
Owner	Energy Manager, Estate & Campus Services
Version Number	1.1
Equality Analysis Form Submission Date	N/A
Approval Date	14 December 2023
Approved By	Director E & CS
Date of Commencement	14 December 2023
Date of Last Review	05 October 2023
Date for Next Review	05 October 2026 (3 years)
Related University Policy Documents	
For Office Use – Keywords for search function	