



## PRIVACY POLICY FOR OUR CUSTOMERS

We will only use personal information we hold about you that we obtain through our website, over the telephone, via social media or otherwise in accordance with this privacy policy. Please read our privacy policy carefully. We take the privacy of all our customers very seriously and are committed to providing you with a service which meets your requirements and protects your privacy.

This privacy policy explains how we may obtain personal information about you and how we will process that personal information from time to time. If you visit a website operated by a third party through a hyperlink included in our website, your information may be used differently by the operator of the linked website. We reserve the right to modify our privacy policy from time to time. When this happens, the homepage on our website will contain a link to or refer to the modified notice.

The licensed electricity distribution companies in the Northern Powergrid group are Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc, which we refer to as “Northern Powergrid”, “we” or “us”, as appropriate, in this privacy policy.

### **WHAT INFORMATION ABOUT YOU WILL WE USE?**

The categories of personal information we use include:

- i) Your name, address, telephone number(s), e-mail address and other contact details, including social media details;
- ii) The meter point administration number (“MPAN”) associated with your property, which relates to the supply of electricity to you through that meter point;
- iii) Your bank account, credit card and/or debit card details in circumstances where you pay us to provide a service to you;
- iv) Details we may need in order to design and install a connection to our electricity distribution network that you have asked us to make to your property;
- v) Your health and/or medical condition or other information such as your age and whether you have children under the age of five, which means you are eligible to be included on our Priority Services Register; and
- vi) Regulatory information, including In respect of the uptake of accredited renewable and low carbon technologies connected to our electricity distribution network under the Feed in Tariff arrangements and the deployment of heat pumps under the Renewable Heat Incentive Schemes for the purposes of network modelling, planning and design.

In addition, as Ofgem, our Regulator, has approved our Data Privacy Plan, if you have a smart meter installed, we are able to receive information from your smart meter about the amount of electricity you use.

We may collect personal information about you that has been obtained from a number of sources. Those sources include telephone discussions with you, which we may record for quality and training purposes, written information you have sent to us, other communications we have with you, such as by e-mail and via social media and our website, the electricity suppliers and gas transporters, organisations that provide such information and the electoral register.

We will use your personal information in accordance with this privacy policy, regardless of the source from which we obtain that information.

## **WHY WE COLLECT PERSONAL INFORMATION ABOUT YOU AND HOW WE USE THAT INFORMATION**

We will not use any automated decision-making in our processing of your personal data and will collect personal information about you in the following circumstances:

**a) You are the owner or occupier of a property that is connected to our electricity distribution network.**

We will collect and process such personal information as is necessary for the performance of the contract you have with us for the maintenance of that connection. This includes providing our services to you under that contract, such as:

- Providing you with information about your power supply and with updates regarding our work to restore your supply in the event of a power cut;
- If you ask for our assistance with work you are carrying out at or alterations you are making to your property;
- Complying with our obligations under various industry agreements and codes, including the Master Registration Agreement and the Retail Energy Code, which facilitate the efficient and effective running of the retail energy market and set the terms for the provision of Metering Point Administration Services and the procedures in relation to changing electricity supplier, including our use of MPANs; and
- Maintaining and testing our various IT systems so that we can operate an efficient and economical system of electricity distribution in accordance with our statutory duty under the Electricity Act 1989.

We consider that we have a legitimate interest in processing your personal information in respect of the operation, maintenance and management of our electricity distribution network and to fulfil our obligations under our electricity distribution licence;

**b) You ask us to provide you with a new connection to our network or to alter an existing connection.**

We will use the personal information you provide to us in order to process your connection request (including to process your payment), enter into a contract with you to provide the new or altered connection and to deliver the work required;

**c) You have a smart meter installed**

We consider that we have a legitimate interest in processing the information we receive from your smart meter in order to provide a better service to our customers. For example, that information will help us to determine where we need to invest in our electricity distribution network to improve the quality of the electricity supply.

We will not use the information we receive from your smart meter for any other reason, for example to sell any products or services to you, and we will not share that information with third parties for commercial reasons.

**d) You join our Priority Services Membership.**

As part of our Priority Services Membership, we hold personal information, including special category personal data relating to health conditions, about customers who are of pensionable age, are disabled or chronically sick, live with children aged under 5 or, due to being in a vulnerable situation, are in need of additional services related to their access, safety, and communication needs. We will be given that information either by you, by someone acting on your behalf or by your energy supplier.

We and our partner organisations, which include the emergency services, social services, charities and not for profit organisations, may use the information relating to our Priority Services Membership that we have been given in order to provide you with the services set out in our guide to what you can expect from us when you join our Priority Services Membership, including helping you in the event of a power cut. Further details of our priority services and a link to our Priority Services Membership booklet can be found at [www.northernpowergrid.com/care](http://www.northernpowergrid.com/care).

We process personal information in respect of our Priority Services Membership in your and in our legitimate interests and, in the case of special category personal data, for reasons of substantial public interest. That processing includes sharing the information we hold about you on our Priority Services Membership with your electricity supplier, gas transporter and water company so that we and they can better provide priority services to you.

**e) You have to make a payment to us for a service in respect of which we have a contract with you or we have a legal obligation to make a payment to you**, for example if you want us to make a new connection to or alter the existing connection of your property to our electricity distribution network or where we are to make a payment to you under one of the Electricity Guaranteed Standards of Performance. We may also make payments to you on a goodwill basis where it is in our or your legitimate interests for us to do so; and

**f) To ensure that we provide you and all of our customers with a high standard of service.**

We use an independent research company to carry out customer satisfaction surveys on our behalf, as required by the terms of our electricity distribution licence. In order to do so, we may provide your details to Explain Market Research Limited, which is currently our appointed research company. If we do so, Explain Market Research Limited may contact you to complete a brief survey regarding your satisfaction with our service. Given the nature of the services we provide to you and the statutory and regulatory environment in which we are required to operate, we believe that the way in which we process your personal information for this purpose is in the interests of providing you with a high standard of customer service such that your interests or fundamental rights and freedoms as the data subject are not overridden by the ways in which we do so.

You are not obliged to provide us with your personal information. However, if you do not do so, we will be unable to provide you with the level of customer service we would like, such as keeping you up to date with our progress in fixing problems on our electricity distribution network that may affect the power supply to your property.

**WITH WHOM WILL WE SHARE YOUR PERSONAL INFORMATION?**

We will only transfer your personal information to third parties on the basis set out in this privacy policy and may disclose your personal information to:

i) Other companies in the Northern Powergrid group;

- ii) Third parties whenever we are required to do so either by law, including to the Police, other law enforcement agencies and Her Majesty's Revenue and Customs, or by the terms of our electricity distribution licence, including for customer satisfaction research and other regulatory purposes;
- iii) Other parties to the energy industry agreements and codes, including the Retail Energy Code, for the purpose of fulfilling our obligations under those agreements and codes. Those parties will be acting either as joint controllers or processors of that data as appropriate to their functions under the relevant agreement or code;
- iv) Companies or other organisations (including other companies in the Northern Powergrid group), with which we have a contract in order to provide our services to you in performance of a contract we have with you or with which we have a contract in order to operate our business, such as our IT service providers; and
- v) Organisations such as the emergency services, social services, charities and other not for profit organisations and your electricity supplier, gas transporter and water company so that you can be provided with priority services in the event of a power cut or a similar incident resulting in the loss of your gas or water supply. We may, in certain circumstances, share personal information with some or all of those organisations either directly or via the UK Government's ResilienceDirect system, including for purposes associated with the Civil Contingencies Act 2004.

#### **FOR HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?**

Depending on the circumstances, we will retain personal information for as long as is necessary for the purposes set out in this privacy policy or as set out below, as appropriate:

- i) The length of time your property is connected to our electricity distribution network and for at least seven years thereafter so that we are able to respond to any queries, complaints, claims or litigation;
- ii) Seven or twelve years following expiry of any contract we may have with you, depending on the nature of that contract;
- iii) Seven years so that we have the opportunity to deal with any issues that may arise with your power supply or your relationship with us, be it of a statutory, customer service nature or otherwise; or
- iv) For so long as we need to do so for legal, litigation or taxation reasons or for reasons related to compliance with our electricity distribution licence and/or the industry agreements that are associated with our role as a distribution network operator.

#### **PROTECTING YOUR INFORMATION**

We maintain stringent security measures designed to protect not only your personal information but other information in respect of the operation of our electricity distribution network. Our core information security principles are to protect personal data in terms of:

- Confidentiality, by protecting personal data from breaches, unauthorised disclosures, loss or unauthorised viewing;
- Integrity, by not allowing personal data to be modified without due cause; and
- Availability, by protecting personal data from disruption.

To achieve this, the measures we implement include adhering to various security standards, including holding ISO27001 accreditation in respect of customer-related data, physical and technological protection, data encryption, having in place a suite of policy and procedural documentation in respect of the way in

which we handle and keep personal data secure and asking you for proof of identity before we disclose your personal information to you.

Where we transfer your personal information to third parties in order to provide our services to you or to operate our business, we will put in place arrangements to protect that information.

### **TRANSFERRING PERSONAL INFORMATION INTERNATIONALLY**

We may need to transfer some personal information to organisations that are outside of the UK, for example to our outsourced IT service providers or to other organisations for hosting purposes. We will ensure that such transfers are either to countries in respect of which the UK has made an adequacy decision or there are appropriate safeguards in place to protect that information, including at least one of the safeguards required by data protection law.

We transfer personal data to Tata Consultancy Services, our outsourced IT services provider in India, using such appropriate safeguards and to Cap Gemini, our outsourced IT services provider in Poland, which is in the European Union.

Otherwise, we will not transfer your personal information to a third party outside of the UK unless you have confirmed to us that you are happy for us to do so.

### **CONTACTING US AND YOUR RIGHTS**

If your property is connected to the electricity distribution network of Northern Powergrid (Northeast) plc, the controller of your personal information is Northern Powergrid (Northeast) plc.

If your property is connected to the electricity distribution network of Northern Powergrid (Yorkshire) plc, the controller of your personal information is Northern Powergrid (Yorkshire) plc.

Northern Powergrid Metering Limited is also a controller of a limited amount of personal data (including MPANs and Meter Point Registration Numbers for gas meters) in circumstances where it provides a smart or conventional meter to your energy supplier for installation in your property.

If you would like to contact us about how we process your personal information, you can do so by clicking on the "Make an enquiry" button at the bottom of the Home page on our website at [www.northernpowergrid.com](http://www.northernpowergrid.com) or by writing to the Data Protection Officer, whose contact details are:

John Elliott  
Head of Regulatory Compliance  
Northern Powergrid  
Lloyds Court  
78 Grey Street  
Newcastle upon Tyne  
NE1 6AF

Subject to certain conditions, you have the right to:

- i) Access your personal information;
- ii) Be informed about how we process your personal information;
- iii) Have your personal information rectified or erased;
- iv) Restrict our processing of your personal information;

- v) Object to our processing of your personal information; and
- vi) The portability of your personal information, e.g. to receive that information in a “machine-readable format”.

If we are processing any of your personal data based on you having given us consent to do so, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing we may have undertaken based on your consent before it is withdrawn.

You have the right to complain to the Information Commissioner’s Office about the way in which we process your personal information. You may do so by clicking on “Make a complaint” button on the Information Commissioner’s website at <https://ico.org.uk/> or by writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## **COOKIES**

We use cookies to help improve your experience of using our website. For more information on cookies and how we use them, please see our Cookies section at <http://www.northernpowergrid.com/cookies>.

Please note that, by deleting our cookies or disabling future cookies, you may not be able to access certain areas of our website.

We use Google Analytics and Google Advertising cookies for analytical purposes. For example, we obtain demographic information such as age, gender and your interests in order to improve our website. This allows us to gain an insight into the functionalities required by users of our website and to improve their experience of using it.

We also use cookies from third-party partners, such as Google, for customer contact purposes.

## **CAN I OPT OUT OF GOOGLE ANALYTICS?**

Yes, you can do so by downloading a Google Analytics Opt-out Add-on and applying it to your computer. You can download that Add-on from <https://tools.google.com/dlpage/gaoptout/>. It also works on mobile telephones.

You can also manage and opt-out from interest-based advertising on your browser and mobile telephone at <http://optout.networkadvertising.org/#/>.

## **CALL MONITORING**

We reserve the right to monitor all forms of communication we have with you, whether those communications are in electronic or other forms, for the purposes of developing and improving the services we provide to you, for staff training and quality assurance purposes, for compliance with our policies and procedures and for safety-related purposes.

We may also use such monitoring to provide evidence of transactions which we have entered into with you.

We may record telephone calls with you for quality assurance purposes and we may collect personal information about you during those calls. We will deal with any personal information we do collect about you over the telephone in accordance with this privacy policy.

**SPECIAL NOTE TO CHILDREN UNDER THE AGE OF 13**

If you are under the age of 13, please do not send us your personal information, for example your name, address or e-mail address. If you wish to ask us a question or use our website in any way that requires you to send us your personal information, please ask your parent or guardian to do so on your behalf.

April 2023