

# Personal data privacy notice

## What is the purpose of this Statement?

Personal data is data which by itself, or with other data, can be used to identify you as an individual. It does not include data where the identity has been removed (anonymous data). There are 'special categories' of more sensitive personal data which require a higher level of protection.

This statement sets out how we, Northern Gas Networks (NGN) as a data controller will use your personal data.

NGN is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy statement. This statement does not form part of any contract to provide service and it may be updated at any time.

It is important that you read this statement, together with any other privacy statement we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

You can contact the Data Protection Officer (DPO) for NGN at 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up-to-date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

## Who do we collect information about?

We have to process personal data in order to properly run our business and provide services and maintain our accounts and records. If you are, or if you potentially are, a customer or client, supplier or service provider, advisor, consultant or professional advisor, or any other stakeholder, then we will process your personal data.

## What types of Personal Data do we collect and use?

We will collect, store, and use some or all of the following categories of personal information about you:

- **Personal contact details** such as name, title, addresses, telephone numbers, and personal email addresses
- **Financial details** such as details of bank accounts
- **Family, lifestyle or social circumstances** if relevant to the product or service we supply to you
- **Record of products** or services obtained or applied for
- **Payment** and compensation history

We also collect, use and share aggregated data such as statistical or demographical data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect aggregated data with your personal data so that it can be directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect, store and use the following 'special categories' of more sensitive personal information but only as required:

- **Information about your health**, including any medical condition, disabilities or vulnerabilities

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## How do we collect personal data?

We collect personal data that you provide directly to us in relation to any of our services. We will also collect personal data about you from third parties who are essential to the goods or services we provide, for example, Xoserve for Meter Point Reference Numbers (MPRN) and other associated data. In addition, we may collect personal data from other publicly available sources.

## How will we use your personal data?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- 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

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests)
2. Where it is needed in the public interest or for official purposes

We need all the categories of data listed above to fulfil our requirements. In some cases, we will use your personal information to pursue legitimate interests of our own, or those of third parties, provided your interests and fundamental rights do not override those interests.

We have set out below in a table format, a description of the main ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified our legitimate interests where appropriate.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notify you about changes to our terms or privacy policy</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interest (to</li> </ul>

<ul style="list-style-type: none"> <li>Asking you to leave a review or take a survey</li> </ul>		<p>keep our records updated and to study how customers use our businesses/services, to develop and grow our businesses/services</p>
To enable you to partake in a survey	<ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> <li>Usage</li> <li>Communications</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary for our legitimate interest (to keep our records updated and to study how customers use our businesses/services, to develop and grow our businesses/services)</li> </ul>
To administer and protect our business and this website including troubleshooting, data analysis, testing, system maintenance, support, reporting or hosting data	<ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> <li>Technical</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>Necessary to comply with a legal obligation</li> </ul>

## When will we use your personal data for another purpose?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How will we monitor communications?

Subject to applicable laws, we will monitor and record: calls, emails, text messages, social media messages and other communications in relation to our dealings with you. We will do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of your communications systems, for quality control and staff training, and when you need to see a record of what's been said. All monitoring will be justified by our legitimate interests or our legal obligations.

## Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

## Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

## What third parties do we share information with?

For the reasons provided above we may share your data with (note this list is not exhaustive): Xoserve, and by extension gas shippers, and direct service providers contracted to carry out work on behalf of NGN.

## How do we protect the security of your information when we share it with third-parties?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Data security

### What measures have we put in place to secure your personal data?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Data retention

### How long will you use my information for?

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the amount of time we keep personal data for we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. All personal data will be kept in line with our Data Retention and Destruction Policy.

## Rights of access, correction, erasure, and restriction

### What is your duty to inform us of changes?

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us.

### What are your rights in connection with personal information?

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note 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.
- **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 consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw consent.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

### Will we charge you for this?

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### Is there anything that NGN may need from you?

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is

another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Content and changes to this privacy notice**

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those content may allow third parties to collect or share data about you. We do not control these third-party's websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

NGN reserve the right to amend this Privacy Notice at any time and without prior notice.

## **Further information**

If you require any further information please contact the Data Protection Officer (DPO) for NGN at 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Alternatively, please email: [gdpr@northerngas.co.uk](mailto:gdpr@northerngas.co.uk)