

NORTHERN POWERGRID METERING LIMITED PRIVACY POLICY

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 your privacy 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.

Northern Powergrid Metering Limited is part of the Northern Powergrid group and we refer to Northern Powergrid Metering Limited as "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; and
- ii) The meter point administration number ("MPAN") associated with your property, which relates to the supply of electricity to you through that meter point, and the Meter Point Registration Number ("MPRN"), which relates to the supply of gas to you through that meter point.

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 if your energy supplier has installed an electricity or gas meter belonging to us in your property.

We will process your personal data, including the MPAN(s) and MPRN(s) associated with your property, to:

- a) Confirm that an electricity or gas meter belonging to us is installed in your property and to charge your energy supplier for the use of that meter in accordance with the terms of a contract we have with that supplier;
- b) Maintain and test our IT systems; and

c) Communicate with you for the purpose of responding to any queries you may have or in respect of the electricity or gas meter belonging to us that is installed in your property.

Consequently, we consider that we have a legitimate interest in processing your personal information in respect of the operation and management of our business.

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, and/or for regulatory purposes; and
- iii) Companies or other organisations (including other companies in the Northern Powergrid group), with which we have a contract in order to operate our business, such as the energy suppliers, our IT Infrastructure Services provider, other IT service providers and meter manufacturers.

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 an electricity or gas meter belonging to us is installed in your property and for at least seven years thereafter so that we are able to respond to any queries, complaints, claims or litigation; and
- ii) For so long as we need to do so for legal, litigation or taxation reasons or for reasons related to compliance with industry agreements or other contracts we may have that are associated with our role as a meter asset provider.

PROTECTING YOUR INFORMATION

We maintain stringent security measures designed to protect your personal information. 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, 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 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 Infrastructure Services 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 our outsourced IT Infrastructure Services provider in India using such appropriate safeguards.

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

Northern Powergrid Metering Limited is the controller of your personal information, including the MPAN(s) and MPRN(s), in circumstances where we provide 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 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 you 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" 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 2021