Last Mile
Privacy Notice

Group Privacy Notice

This Privacy Notice explains how the Last Mile Infrastructure Group of companies collects, stores, manages and protects your personal data in compliance with the Data Protection Legislation. The companies to which this notice applies are set out at the end of this Notice.

To make reading this Notice easier, we refer to the collection, usage, storage, sharing, management and protection of personal data as processing.

References in this notice to Data Protection Legislation means (as applicable) the UK GDPR, Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, all as amended from time to time.

For the purposes of this Notice, we act as a controller of personal data, which means we are responsible for deciding how we process your personal data.

This Notice applies to:

- the employees, contractors, consultants and workers of our external stakeholders, including clients and suppliers; and
- customers who we provide services to.

1. Aims of this What personal data do we collect and from where?

In this Notice, personal data means personal information about you from which you can be identified. Most of the personal data we process is provided by you as part of your interactions with us.

Your personal data may also be provided from: (1) your interactions with our website, where we will automatically collect technical data about you (please see our Cookie Policy for further details; or (2) third parties (such as Glenigans Lead Generation Database) in order to send marketing material to our current or prospective clients and customers.

Personal data includes the following data types and examples:

1.1. Identity Data: Information used to identify an individual.

Examples: Name, address, email address, phone number, date of birth, marital status, passport, driver's license, username

1.2. Contact Data: Information used to communicate with an individual.

Examples: Address, email address, phone number.

1.3. **Location Data: Information about where an individual is or has been.**

Examples: GPS coordinates, IP address, location history, check-in data.

1.4. **Online Identifiers: Data generated by an individual's use of the internet.**

Examples: IP address, cookie IDs, usernames, device identifiers.

1.5. **Financial Data: Information related to an individual's financial situation.**

Examples: Bank account details, credit card numbers, salary, payment history

1.6. **Transaction Data: Information about purchases and transactions.**

Examples: Purchase history, order details, payment methods used.

1.7. **Technical Data: Information about an individual's device and internet usage.**

Examples: IP address, browser type and version, operating system, device model, time zone setting, browsing history, search queries.

1.8. **Profile Data: Information about an individual's interests, preferences, and behaviour.**

Examples: Interests, hobbies, shopping preferences, website visits, survey responses.

1.9. **Professional or Employment-related Data: Information related to an individual's work or profession.**

Examples: Job title, employer, work history, performance reviews, salary, professional memberships.

1.10. **Education Data: Information about an individual's education history.**

Examples: Schools attended, degrees obtained, grades, academic records.

1.11. **Special Categories of Personal Data (Sensitive Personal Data): These categories are subject to stricter processing rules due to their sensitive nature.**

Examples:

- Personal data revealing racial or ethnic origin;
- Personal data revealing religious or philosophical beliefs;
- Personal data revealing trade union membership;
- Biometric data (where used for identification purposes);
- Data concerning Health;
- Data concerning a person's sex life or sexual orientation.

Your personal information does not include personal information where identifiers that associate that data with you have been removed. We term this anonymous data. Aggregated data could be derived from your personal information but is not considered personal information in law as this data will not directly or indirectly reveal your identity. We may collect, use and share aggregated data such as statistical or demographic data for any purpose.

2. How do we use your personal data?

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	a) Identity b) Contact c) Special Circumstances	a) Performance of a contract with you b) Necessary to comply with a legal obligation (for Special Circumstance Data this is to comply with our requirements of maintaining a Priority Services Register)
Customer Contract/ Agreement - to process and deliver your contract with us as part of our ongoing relationship including: a) Manage payments, fees and charges b) Communicating with you c) Responding to your requests or inquiries d) Collect and recover money owed to us	a) Identity b) Contact c) Financial d) Special Circumstances e) Marketing and Communications	a) Performance of Contract b) Necessary to comply with a legal obligation (for Special Circumstance Data this is to comply with our requirements of maintaining a Priority Services Register) c) Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which may include: a) Notifying you about changes to our terms and conditions b) Asking you to leave a review or take a survey c) Manage and respond to complaints	a) Identity b) Contact c) Marketing and Communications d) Special Circumstances	a) Performance of a contract with you b) Necessary to comply with a legal obligation (for Special Circumstance Data this is to comply with our requirements of maintaining a Priority Services Register) c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
Information sharing with our regulators such as Ofgem and Ofwat - which require us to participate in industry data-sharing arrangements regarding the premises connected to our utility networks.	a) Identity b) Contact c) Special Circumstances	Necessary to comply with a Legal obligation (for special circumstance data this is to comply with our requirements of maintaining Priority Services Register).
To assess your suitability for employment and manage the recruitment process	a) Identity b) Contact c) Employment history d) Qualifications e) Right to work documentation f) Special Category Data (e.g. health/disability information for reasonable adjustments)	a) Necessary for our legitimate interests (to assess and manage applications, ensure appropriate staffing, and maintain recruitment records) b) Necessary to comply with a legal obligation (e.g. verifying right to work in the UK) c) Explicit consent (for processing Special Category Data where required)
To maintain the security of our website and services, for fraud detection, and to protect our rights	a) Identity b) Contact c) Technical d) Usage e) Online Identifiers f) Profile	a) Necessary for our legitimate interests (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) b) Necessary to comply with a legal obligation
To administer and protect our business and this website	a) Identity b) Contact	a) Necessary for our legitimate interests (for running our

(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	c) Technical	business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation
Direct Marketing	a) Identity b) Contact c) Profile d) Marketing and Communications	a) Necessary for our legitimate interests (to grow our business) b) Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	a) Technical b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)
To aid in application for statutory or licensed works	a) Identity	Necessary for our legitimate interests (to develop our services and grow our business)
For business marketing purposes	a) Identity (Photographs at Marketing Events only)	Necessary for our legitimate interests (to develop our services and grow our business)

Industry databases

Our regulated operations have a legal obligation to utilise industry-wide databases containing personal data. This data includes names, addresses, and unique alphanumeric identifiers like Meter Point Reference Numbers (MPRNs) and Meter Point Address Numbers (MPANs). Some of these databases may also indicate if an individual is considered vulnerable due to health or other circumstances. We use this information to identify the users of our energy networks and, when applicable, to understand any specific or extra support they might require.

Priority Services Register

Under our legal and regulatory obligations set out in our licenses and statutory duties for gas, electricity, water and heat networks, we are required by our regulators to establish and maintain a Priority Services Register. The Priority Services Register is a free, voluntary service designed to provide extra assistance to individuals in vulnerable situations. Sign up for our Priority Services Register here.

By registering, you will provide us with information about yourself and your household. This includes details about any health conditions and other relevant living circumstances. This information allows us to effectively support you during planned or unplanned service interruptions.

To ensure comprehensive support for consumers who may not be directly registered with every utility provider, companies within the industry may share information from their Priority Services Registers. This sharing is strictly for the purpose of providing necessary support during incidents and will not be used for any other reason.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising in respect of the services that we offer.

You can ask us to stop sending you marketing messages by contacting us at any time. Where you ask us to stop sending marketing messages, we may still process your personal data for other purposes in accordance with the terms of this Notice.

Cookies

Our website uses cookies to enhance your browsing experience by remembering your preferences and repeat visits, allowing us to provide you with the most relevant content. For comprehensive information on how this data is utilized, please refer to our Cookie Policy.

3. Who do we share personal data with

Most personal data is kept within the Last Mile Infrastructure Group of companies. We may also share your personal data with third parties where that is necessary to comply with the law, necessary to enter into a contract with you, or to protect our rights and operate our usual business practices:

- Affiliates: We share your personal data with affiliated legal entities within the Last Mile family of companies for internal administrative purposes and uses that are consistent with this Notice such as delivery of services.
- Business services providers: We may share your personal data with third-party business services providers who perform services on our behalf or for your benefit, such as for billing and payment processing, marketing and analytics, companies who send out communications for us including those who we use to send out text messages to customers during interruptions to services, and our IT service providers including hosting providers.

- Professional advisors: We may share your personal data with our professional advisors, including our legal and accountancy service providers, auditors and insurance brokers.
- Subcontractors: We might need to provide personal details to subcontractors or emergency service providers who perform services on our behalf — for example, details of contacts on site.
- Legal process and safety: Legal or government regulatory authorities as required by applicable law such as tax authorities and industry regulators — for example, HMRC, the Home Office (for sponsored employees) Ofgem, Ofwat, the HSE, the Environment Agency, the Drinking Water Inspectorate and Lloyds Register — to fulfil our legal obligations and to assist them in fulfilling their regulatory functions.
- Business transfers: Your personal data may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy or receivership.
- Other providers: Other gas, electricity, water and heat network companies including distributors and suppliers so they can contact you in the event of interruptions to your services.
- Other third parties as necessary to comply with the law or with your permission.
- We review all contractual arrangements we have in place with third parties who receive personal data from us to ensure such third parties have robust systems and procedures to ensure compliance with the Data Protection Legislation.

International transfers of personal data

Personal data we collect may be transferred to third parties outside of the United Kingdom. If we do so, we will comply with applicable law regarding such transfers. Where such transfers require appropriate or suitable safeguards recognised under UK data protection laws, we may rely on them.

Typically, these include:

- Adequacy decision: We may transfer your personal data to countries which the ICO or UK Government has approved as providing adequate protection to personal data (for example the decision of adequacy attaching to the EU for transfers from the UK).
- Approved contracts: We may be entitled to put in place a contract with the recipient of your information which requires them to protect that information to the same standards as if the information were being processed within the UK.
- By contract: In respect of certain cross-border transfers, we will transfer your personal data outside the UK if the transfer is necessary to the performance of a contract between you and us, or if the transfer is necessary to the

performance of a contract between us and a third party, and the contract was entered into in your interest.

- With your consent: In respect of certain transfers, we will obtain your consent to transfer your personal data outside the UK after first informing you about the possible risks of such a transfer.

The safeguards we use will depend on the location of the recipient, the function they are performing, and the personal data being transferred. You can request more information by contacting us.

This procedure applies to anyone working for Last Mile or job applicants who apply to work for Last Mile, and is relevant to all stages of the employment relationship. Last Mile encompasses Last Mile Infrastructure Group Limited, and its direct and indirect subsidiaries. This includes employees, workers, contractors, volunteers, interns and apprentices.

4. How do we protect your personal data?

We have taken all appropriate technical and organisational measures in accordance with Data Protection Legislation to protect your personal information against unauthorised or unlawful processing and against accidental loss, destruction or damage. We are committed to updating these measures appropriately as new technology becomes available.

5. How long do we keep your personal data?

We only keep your personal data for so long as it is reasonably necessary. When setting our data retention periods, we consider the amount, nature and sensitivity of the data we hold, the potential risk of harm from unauthorised use or disclosure of the data and the purposes for which we process the data.

Most personal data will be kept for the duration of our relationship with you plus an additional six (6) years (or any longer period required by law). The reason for this is that if we have to respond to a legal claim, we might need to use records that contain your personal data and most legal claims have to be brought within six (6) years.

6. Your Data Protection Rights

In accordance with current UK data protection law, you have a number of rights relating to the processing of your personal data. These rights include:

- Right to be Informed: We will inform you of how we are processing your personal data via notices such as this privacy notice.
- Right of Access: You have the right to ask us for a copy of the personal data we hold about you. This is known as a Subject Access Request or SAR. This will help you understand the information about you that we're using and in what ways. You can also check the information is accurate and up to date.

- Right to Rectification: If the data we hold about you is inaccurate or incomplete, you can ask us to correct or delete it.
- Right to Erasure: In some circumstances, you can ask us to delete your personal data. When you exercise this right, we'll respond to explain which data we've deleted and any we can't delete including the reasons why (e.g. compliance with legal obligations or establishing, exercising or defending legal claims).
- Right to Restrict: In certain circumstances you can ask us to restrict or limit the way we process your personal data if you're concerned about how accurate it is, how it's being used or if you want to stop us deleting it. This is usually a temporary measure.
- Right to Data Portability: You have the right to receive certain limited personal data from us in a format that can be transferred electronically to you or a third-party data controller.
- Right to Object: You have the right to object to us processing your personal data. This might allow you to stop or prevent us from using it. When you exercise this right, you should explain which use of your personal data you're objecting to, and the reasons why.
- Right to Object to Automated Decision-Making including Profiling: You have the right to object to decisions made solely by automated means (without human involvement) if those decisions significantly affect you, such as by impacting your legal rights or other similarly important aspects of your life (e.g. automated processes used in online recruitment). Profiling involves using your personal data to analyse or predict certain outcomes. While it can occur in some automated decision-making processes, it's not a universal feature.

If you would like to exercise any of the rights detailed above, please contact us using the Contact Information provided in the section below.

No fee usually required

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.

What we 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 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.

Freedom of Information and Environmental Information Regulations.

Last Mile Water Limited (LMW) operates as a New Appointee and Variation (NAV) under appointment by Ofwat. As such, LMW may be subject to requests for information under the Environmental

Information Regulations 2004 (EIR) provide a right of access to environmental information held by 'public authorities' and those who provide a 'public function'.

LMW perform essential public functions concerning the supply of water and the management of wastewater. Consequently, we are classified as performing public functions and are subject to the Environmental Information Regulations.

7. Contact information

Should you need to contact us to discuss the handling of your personal data or to submit a request to exercise one of your Data Protection Rights, please contact our Data Protection Officer.

Post: Data Protection Officer

Last Mile Infrastructure
Group Fenick House,
Lister Way

Hamilton International Technology
Park Glasgow G72 OFT

Email: dataprotection@lastmile-group.com

Information Commissioner's Office

Whilst we hope that we can address any questions or concerns you might have, should you need to contact the Information Commissioner's Office you can do so using one of the following methods:

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

Telephone: 0303 123 1113 or 01625 545 745

Website: www.ico.org

8. Last Mile group companies

This Privacy Notice applies to:

- Last Mile Infrastructure (Holdings) Limited
- Last Mile Infrastructure Holdco1 Limited
- Last Mile Infrastructure Holdco2 Limited
- Last Mile Infrastructure Group Limited
- Last Mile Infrastructure Holdco Limited
- Last Mile Infrastructure Limited
- Last Mile (Own and Manage) Limited
- Last Mile (Design and Build) Limited
- Last Mile Asset Management Limited
- Last Mile Water Limited
- Last Mile Heat Limited
- Last Mile Electricity Limited
- Last Mile Gas Limited
- Last Mile D&B (North & Scotland) Limited
- Last Mile D&B (Midlands & South) Limited
- Icosa Water Limited
- Last Mile Connections Limited

We will not unlawfully discriminate when applying disciplinary procedures or penalties, or in our redundancy selection criteria or procedures.

9. Changes to our Privacy Notice

This notice was last updated in December 2025. Please note that we may update this Privacy Notice periodically to reflect changes in the law or modifications to our business practices that impact personal data protection.

A copy of our current Privacy Notice is also available upon request from our Data Protection Officer.