

Privacy Policy

Effective Date 8 June 2026

Version 1.0

Who we are

Blue Business Water Ltd (trading as “Blue”), a company registered in England and Wales with company number 09093287, having its registered office at Former Coroners Court, Close, Newcastle upon Tyne, England, NE1 3RQ, is the data controller responsible for the personal information we hold about you. In this policy, “Blue”, “we”, “us” and “our” mean Blue Business Water Ltd, and “you” and “your” mean the individual whose personal information we process.

Blue is a licensed provider of water and waste water retail services to non-household (business) customers in Scotland, regulated by the Water Industry Commission for Scotland. Most of our customers are companies, and information about a company is not personal information. We do, however, process personal information about individuals. This includes sole traders and partners who hold accounts with us, the named contacts, directors, employees and representatives of our business customers, guarantors, and anyone who contacts us. This policy explains how we collect, use, share and protect that personal information.

We are registered with the Information Commissioner’s Office.

The personal information we collect

We may collect and process the following personal information about you:

- your name, job title, and the organisation you work for or represent;
- your contact details, including postal address, email address and telephone number(s);
- account and supply point information, including supply point identifiers (SPIDs) and meter data, where it identifies an individual;
- billing, charging and payment information, including your bank account and Direct Debit details;
- your contact and correspondence history with us, including notes of calls and copies of messages;
- recordings of telephone calls to and from us;
- information about your creditworthiness, payment history and any sums you owe, including information obtained from credit reference agencies;
- information we need to prevent, detect and investigate fraud and other crime; and
- CCTV images, if you visit our premises.

We do not routinely collect special category data (such as information about health). If you choose to provide such information, for example in correspondence with us, we will only process it where we have a lawful basis to do so.

How we collect your personal information

We collect personal information:

- directly from you, when you request a quote, enter into a contract, contact us, make a payment or complete a form;
- from a broker or third party intermediary (TPI) you have authorised to act for you under a Letter of Authority;
- from the previous occupier, owner, landlord or managing agent of a property, in connection with a change of tenancy;
- from Scottish Water, the Market Operator and other licensed providers, as part of the operation of the Scottish water market;
- from credit reference agencies and fraud prevention agencies;
- from public registers, such as Companies House and the Scottish Assessors Association;
- when you visit our premises, which are monitored by CCTV for the security of our staff, visitors and property; and
- automatically when you use our website (see “Cookies and our website” below).

How and why we use your personal information

We use your personal information for the purposes set out below. For each purpose we rely on one or more of the following lawful bases: performance of our contract with you; our legitimate interests; compliance with a legal or regulatory obligation; and, where required, your consent.

What we use your personal information for	Our lawful basis (and, where relevant, our legitimate interest)
Providing the Services and managing your account and supply	Performance of our contract with you; our legitimate interest in running our business efficiently
Billing, taking payment and managing Direct Debits	Performance of our contract; our legitimate interest in being paid for the Services
Assessing creditworthiness and setting credit terms or deposits	Our legitimate interest in managing credit risk; compliance with our legal obligations
Collecting and recovering sums you owe, including instructing debt recovery agents, solicitors and sheriff officers, and	Our legitimate interest in recovering money owed to us; performance of our contract

What we use your personal information for	Our lawful basis (and, where relevant, our legitimate interest)
reporting to credit reference agencies	
Registering and managing your supply points in the Scottish water market, and exchanging data with Scottish Water, the Market Operator and other licensed providers	Compliance with our regulatory obligations; our legitimate interest in operating in the market
Preventing, detecting and investigating fraud and other crime	Our legitimate interest in protecting our business; compliance with our legal obligations
Recording and monitoring calls and communications for training, quality, security, record-keeping and dispute resolution	Our legitimate interests in the matters described; performance of our contract; compliance with our legal and regulatory obligations
Meeting our legal, regulatory and tax obligations, and responding to regulators and the ombudsman	Compliance with our legal and regulatory obligations
Handling complaints, queries, disputes and legal proceedings	Our legitimate interest in defending and pursuing our position; compliance with our legal obligations
Running, improving and securing our business	Our legitimate interest in operating and developing our business
Telling you about our other services	Our legitimate interest in marketing similar services to existing customers; your consent where required

Where we rely on legitimate interests, we have considered whether those interests are overridden by your interests or rights. You have the right to object to processing based on legitimate interests (see “Your rights” below).

Recording and monitoring of calls and communications

We record telephone calls to and from Blue, and we monitor calls, emails and other communications with you. We do this to:

- train and support our staff;
- maintain and improve the quality of our service;
- keep an accurate record of what is said and agreed;

- protect the security of our staff, customers and systems;
- prevent and detect fraud and other crime; and
- help resolve any query, complaint or dispute, including as evidence in legal proceedings.

Our lawful basis is our legitimate interests in the matters set out above and, where relevant, performance of our contract with you and compliance with our legal and regulatory obligations. We keep call recordings for up to 24 months, unless we need to keep a recording for longer to deal with a dispute, a complaint or a legal claim, or to meet a legal obligation.

Credit checks and credit reference agencies

Before and during your contract we may carry out credit checks and exchange information with credit reference agencies (CRAs). We do this to assess your creditworthiness, check your identity, decide whether to offer you credit and on what terms, set any deposit, administer your account, and locate you and pursue payment where any amount remains unpaid after its due date.

We may share information about your account and your payment performance with one or more CRAs, including details of overdue charges and any debts that are not paid in full and on time. We may do this during your contract and after it has ended. CRAs share the information they hold with other organisations.

Where you are a sole trader, a partner, or have given a personal guarantee, the information we share with CRAs may form part of your personal credit record. This may affect your ability to obtain credit elsewhere. The CRAs we use publish information notices explaining how they use and share personal information, and these are available on their websites.

Who we share your personal information with

We may share your personal information with:

- Scottish Water, as wholesaler;
- the Market Operator and other licensed providers, as part of the operation of the Scottish water market;
- the Water Industry Commission for Scotland and any other regulator;
- the Scottish Public Services Ombudsman and any other complaint-handling body;
- the Scottish Environment Protection Agency, in connection with trade effluent;
- credit reference agencies and fraud prevention agencies;
- debt recovery agents, solicitors, sheriff officers and the courts, in connection with the recovery of sums you owe;

- our suppliers, sub-contractors and professional advisers who act on our behalf, including IT, billing, payment, printing and mailing providers, auditors, insurers and lawyers;
- our payment service providers and the Bacs Direct Debit scheme;
- a broker or third party intermediary you have authorised to act for you; and
- any party to whom we are required or permitted to disclose information by law or regulation, or in connection with the sale, transfer or reorganisation of our business.

We require those who process personal information on our behalf to protect it and to use it only as we instruct. We do not sell your personal information.

Marketing

We may contact you about our other services where we are permitted to do so, including where you are an existing customer and the services are similar to those you already receive. You can ask us to stop sending you marketing at any time by contacting us using the details below. Stopping marketing will not affect the service messages we need to send you about your account.

Payments

We collect payments by Direct Debit through the Direct Debit scheme. Where we use payment service providers to process payments, they act on our behalf and are required to keep your information secure.

Where we process your personal information

We process and store your personal information in the United Kingdom. We do not transfer it outside the United Kingdom.

How long we keep your personal information

We retain your personal information while you hold an account with us, and for up to six years after the account is closed. We do this in order to deal with any query, complaint or dispute, to defend or pursue legal claims (including within the periods allowed under the Prescription and Limitation (Scotland) Act 1973), to meet our tax, accounting and regulatory record-keeping obligations, and to recover money owed to us. We may keep your information for longer where there is an ongoing dispute or legal claim, or where the law requires it. Call recordings are normally kept for the shorter period set out above.

Keeping your information secure

We use appropriate technical and organisational measures to protect your personal information against unauthorised access, loss, misuse or alteration. These include access controls, staff training, and arrangements with our suppliers requiring them to keep your information secure.

Your rights

You have the following rights over your personal information:

- to ask for a copy of the personal information we hold about you;
- to ask us to correct information that is inaccurate or incomplete;
- to ask us to delete your information in certain circumstances;
- to ask us to restrict how we use your information in certain circumstances;
- to object to our use of your information where we rely on legitimate interests, and to object at any time to direct marketing;
- to ask us to transfer certain information to you or another organisation in a machine-readable format; and
- where we rely on your consent, to withdraw that consent at any time.

Some of these rights are subject to conditions and exceptions under data protection law. For example, we may continue to hold and use your information where we need it to comply with a legal obligation or to establish, exercise or defend a legal claim.

To exercise any of these rights, please contact us using the details below. There is normally no charge, and we will respond within one month.

Automated decision-making

We may use automated tools to help us assess creditworthiness and manage risk, but a member of our staff is always involved in any decision that significantly affects you. We do not make decisions that produce legal effects, or that similarly significantly affect you, by solely automated means.

Cookies and our website

Our website uses cookies, which are small files placed on your device when you visit. We use cookies that are necessary for the website to work, and we may use analytics cookies to understand how the website is used so that we can improve it. We only set non-essential cookies where you have agreed to them. You can control or delete cookies through your browser settings, although some parts of the website may not work properly if you do.

Changes to this privacy policy

We may update this privacy policy from time to time. The current version is always available at www.blue.supply/privacy. This policy was last updated on 8 June 2026.

How to contact us

If you have any questions about this privacy policy or about how we use your personal information, please contact us:

- by email at hello@blue.supply; or
- by post at Blue Business Water Ltd, Former Coroners Court, Close, Newcastle upon Tyne, England, NE1 3RQ.

If you are not satisfied with how we have handled your personal information, you have the right to complain to the Information Commissioner's Office:

- online at ico.org.uk;
- by telephone on 0303 123 1113; or
- by post at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.