Scottish and Southern Electricity Networks Privacy Notice

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About us

We are Scottish and Southern Electricity Networks ("SSEN"), which is the trading name of Scottish Hydro Electric Transmission Plc ("SHET"), Scottish Hydro Electric Power Distribution Plc ("SHEPD") (of Inveralmond House, 200 Dunkeld Road, Perth, Perthshire PH1 3AQ) and Southern Electric Power Distribution Plc ("SEPD") (of No.1 Forbury Place, 43 Forbury Road, Reading, United Kingdom, RG1 3JH). SHET and SHEPD are subject to the laws of Scotland. SEPD is subject to the laws of England and Wales.

We use your information as further explained in this Privacy Notice. We’ll be the “controller” of the information you provide to us. If you live in Scotland, SHET and SHEPD will be the controller of the information you provide to us. If you live in England, SEPD will be the controller of the information you provide to us. “We”, “we’ll”, “our”, “us” etc. when used in this Privacy Notice will be interpreted as relating to the relevant data controller.

This Privacy Notice covers the following processing activities of SSEN:

- Customer Operations and Complaints;
- Connections;
- Wayleaves (land rights);
- Innovations;
- Stakeholder Engagement;
- Priority Services; and
- Smart Meter

What information do we need?

We collect basic personal data about you specifically, name, address, telephone number, email address, Meter Point Administration Number (MPAN) and Smart Meter consumption data. We may also collect your bank details in certain circumstances. If you contact us, or we contact you, by telephone, we may also record the call for training and service improvement purposes and make notes in relation to your call.

We may also receive personal data about you from third parties, including your electricity supplier, such as up-to-date contact details, off supply notifications and application details for new connection requests. As a transmission and distribution network provider, SSEN works closely with third parties, including your electricity supplier, subcontractors, National Grid, Members of Parliament, local authorities, housing authorities, charities and the Office of Gas and Electricity Markets ("Ofgem").

For more information on personal data collected for Priority Services specifically, please click on the link.
Why do we need it?
We need to know your basic personal data to be able to maintain and operate the electricity transmission and distribution networks for which we are responsible. In particular, we need to know your basic personal data to direct your enquiries to the correct SSEN team, to allow our engineers to visit you onsite where required and to provide assistance to you in the case of an emergency.

Legal bases for processing
In order to process and use your personal information lawfully, we rely on the following legal bases:

• for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract;
• to comply with our legal obligations;
• for our legitimate interests in ensuring effective operational management and internal administration, document retention/storage, compliance with regulatory guidance, exercise or defence of legal claims, product/service improvement and communicating with you; and
• with your consent, to maintain and develop our relationship with you, including marketing our products and services and market research. You may withdraw your consent at any time.

For more information on the legal grounds for processing for Priority Services specifically, please click on the link.

What do we do with it?
The personal data we process is processed by our staff to:

• enable our customer contact centre to help you with any enquiries or complaints;
• communicate with you by telephone, mail, email or other electronic means;
• enable us to provide you with assistance in order to ensure the distribution of electricity to you and to contact you in an emergency;
• monitor our work and maintain our records;
• obtain feedback on how we can improve our services;
• allow us to process charges in the event of damage to our equipment; provide compensation to customers in certain circumstances;
• comply with legal or regulatory requirements; and
• carry out checks on customers, suppliers and other third parties, which relate to activities such as anti-money laundering, countering terrorist financing and other unlawful acts (for example, illegal trafficking and environmental crime) and anti-bribery and corruption requirements.

For additional information on what we do with your personal data for Priority Services, Connections, Innovations, Stakeholder Engagement, Wayleaves or Smart Meter specifically, please click on the relevant link

We may share your information with:

• your electricity supplier;
• Ofgem, the Energy Ombudsman and any other regulatory authority we may be subject to for the purposes of demonstrating compliance with applicable law and regulations;
• our sub-contractors for the purposes of carrying out work on our electricity distribution networks; and
• our service providers for the purposes of providing services to us (including third party survey providers in order to carry out surveys on our behalf).

We may also use aggregate information and statistics in order to help us develop our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

Marketing:
If you have provided consent, or we otherwise have the right to do so, we may send to you direct marketing and promotional materials relating to our services, engagement activities or related products, for example sending you communications (including by email) for these purposes. You can unsubscribe at any time by clicking the “Unsubscribe” link in any of our emails or by emailing unsubscribe@ssen.co.uk
How long will we keep it?

We will keep your information only for as long as necessary depending on the purpose for which it was provided.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us using the details below in the ‘Contacting us’ section.

How is your personal information transferred outside the EEA and the UK?

International Data Transfers – How is your personal data transferred outside of the European Economic Area (EEA)?

We, or a third party who we share personal information with, may transfer, host, store and/or handle your personal information outside of the EEA. For example, where we and/or our service providers (including servers) are based outside of the EEA.

The EEA consists of countries in the European Union, Iceland, Liechtenstein and Norway and are all considered to have equivalent laws in data protection and privacy. During the Brexit transition phase (until 31 December 2020), the UK including Northern Ireland, are also considered to have equivalent laws in data protection and privacy.

We will only permit this to happen if adequate safeguards have been put in place to protect your personal information. For countries outside the UK, this means that we will:

a) ensure that the country in which your personal information will be handled has been deemed “adequate” by the European Commission under Article 45 of the General Data Protection Regulation (GDPR); or

b) include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA and the UK into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR).

Your rights

You have the following rights regarding your information:

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<thead>
<tr>
<th>Rights</th>
<th>What does this mean?</th>
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</thead>
<tbody>
<tr>
<td>1. Right to be informed</td>
<td>You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we’re providing you with the information in this Privacy Notice.</td>
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<tr>
<td>2. Right of access</td>
<td>You have the right to obtain access to your personal data (if we’re processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you’re aware and can check that we’re using your personal data in accordance with data protection law.</td>
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<tr>
<td>3. Right to rectification</td>
<td>You are entitled to have your personal data corrected if it’s inaccurate or incomplete.</td>
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<td>4. Right to erasure</td>
<td>This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where there’s no compelling reason for us to keep it. This is not a general right to erasure; there are exceptions.</td>
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<td>5. Right to restrict processing</td>
<td>You have rights to ‘block’ or suppress further use of your personal data in</td>
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<tr>
<td>Rights</td>
<td>What does this mean?</td>
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<td>certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.</td>
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<td>6. Right to data portability</td>
<td>You have the right to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.</td>
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<tr>
<td>7. Right to object to processing</td>
<td>You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.</td>
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<tr>
<td>8. Right to withdraw consent</td>
<td>If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for direct marketing.</td>
</tr>
</tbody>
</table>

For more information on your rights or if you would like to exercise any of your rights, you are welcome to contact us at the contact details set out below under “Contacting us”.

**Contacting us**

If you would like to contact us in relation to your rights, or if you are unhappy with how we’ve handled your information, you may contact us as follows:

- **Email:** networksdataprotection@sse.com
- **Address:** Networks Data Protection Team, 2nd Floor, SSEN, Inveralmond House, 200 Dunkeld Road, Perth PH1 3AQ

If you would like to contact our Data Protection Officer, you may do so using the following details:

- **Email:** GroupDPO@sse.com
- **Address:** Data Protection Officer, No. 1 Forbury Place, 43 Forbury Road, Reading, RG1 3JH

If you’re not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner’s Office (ICO) using the following details:

- **Address:** Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- **Telephone number:** 0303 123 1113
- **Website:** [www.ico.org.uk](http://www.ico.org.uk)
1. PRIORITY SERVICES

Special categories of personal data

In addition to collecting your basic personal data (name, address, telephone number and email address), if you have registered for our Priority Services we process special categories or “sensitive” data about you (e.g. personal data concerning health) where we have asked for your explicit consent or otherwise where this is necessary:

- to protect your vital interests or the vital interests of another person, if you or they are incapable of providing consent;
- under the Civil Contingencies Act 2004; or
- for the establishment, exercise or defence of legal claims.

Where your consent is required, we will ask you for it at the relevant time. You may withdraw your consent to this processing and remove your name from the Priority Services Register at any time by contacting us on 0800 294 3259.

What do we do with your personal information?

We use your information to:

- register you for our Priority Service;
- ensure that you are provided with the ongoing support you need in an emergency, bad weather and for planned supply interruptions (including providing you with updates and alerts) both onsite and through our customer contact centre;
- liaise with your nominated contact (where provided);
- periodically contact you to confirm that the details we hold for you are up to date;
- provide you with information in Braille, via an audio CD or language other than English if you require it; and
- provide you with a security password.

We may also receive personal information about you from your electricity suppliers, gas suppliers, water company, welfare organisations and NHS organisations to include you on our Priority Services register so that you will benefit from this service. We will send you a letter to notify you when you have been added to the register.

We may share your information with:

- welfare organisations, local authorities, and emergency services for those organisations to provide support and assistance to you in special circumstances or emergencies; and
- our sub-contractors to provide onsite support during, planned supply interruptions, bad weather or emergencies.

2. CONNECTIONS

What do we do with your personal information?

We use your information to:

- process your application and provide you with designs and quotations for a new connection to our electricity network;
• provide feasibility and budget estimates;
• move or divert your existing supply of electricity to a new location as requested by you;
• manage applications for disconnection from our electricity network;
• manage generation applications, which is reportable to our regulator Ofgem;
• provide our operational teams with the necessary information to carry out the connection works onsite;
• share your contact details where you are the primary generator with a flexible connection to assist other applicants who are interested in shared capacity connections;
• contact you to invite you to take part in connections engagement activities, provide comment/feedback on changes in policy and improvements to systems;
• comply with legislation associated with the provision of electrical connections;
• carry out inspections to comply with our legal and regulatory obligations; and
• investigate reports of potential cases of electricity theft.

3. INNOVATIONS

What do we do with your personal information?

If you register an interest in being kept up to date with any new innovation projects undertaken by SSEN, a particular project or sign-up to be part of a particular project, we use your information to:

• send you newsletter communications with updates about our ongoing or new innovations projects; this may also include information on wider industry events such as those organised by other DNOs or the Energy Networks Association;
• design projects to trial innovative technologies to help manage the SSEN network;
• effectively deliver innovations projects; and
• verify any analysis carried out on those projects (which could include monitoring devices installed in customer homes);

We may receive your information from third parties working in association or partnership with a particular project e.g. local housing associations.

In many cases, we deliver innovation projects with external partners such as local housing associations, and we may need to share your information with them to ensure that we can deliver the project successfully.

4. WAYLEAVES

What do we do with your personal information?

We use your information to:

• agree rights in land;
• manage existing land rights;
• carry out administrative duties relating to rights agreed inclusive of payments;
• carry out other land liaison duties such as notification of project work, operations and maintenance;
• process wayleaves payments; and
• facilitate access to install, monitor, maintain and remove apparatus lawfully situated on your land.
We may also share your information with any legal representative you have appointed to liaise with us on your behalf and with contractors undertaking development projects and maintenance.

5. **STAKEHOLDER ENGAGEMENT**

**What do we do with your personal information?**

We use your information to:

• fulfil and evidence regulatory stakeholder engagement targets and obligations;
• record your consent and marketing preferences;
• invite you to future stakeholder activities and events that may be of interest to you;
• record your attendance at events and any feedback you have provided; and
• provide you with updates and relevant information on SSEN activities, including progress of initiatives, forthcoming developments and opportunities to engage and consult.

We may share your information with our third party service providers who carry out engagement activities, surveys and/or research on our behalf.

6. **SMART METER**

**What do we do with your personal information?**

SSEN will access and utilise personal data from Smart Meters installed in customers’ homes, including aggregated half hourly electricity consumption data in order to fulfil our Regulated Duties, and to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. It will also be used to ensure that new low-carbon technologies are connected efficiently and economically without affecting supply to existing customers and where possible avoid the need to reinforce the network.

Updated: January 2021

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