

# Privacy Information Notice

Last updated February 2022



## Privacy Information Notice

This Privacy Information Notice (PIN) describes your rights under the UK General Data Protection Regulation and Data Protection Act 2018 (the “Data Protection Legislation”) and sets out how we will use and protect your personal information.

We publish the current version of our PIN on our website and we will update this from time to time.

We will contact you (by email or letter) to notify you of these updates where:

- we are making substantial changes; or
- we are doing something with your personal information, which you might not expect based on what we have told you in this PIN.

Otherwise, any updates to this PIN will be notified on our website and through our other communications with you.

This PIN is effective from 28th February 2022.

## Who are we?

Your information will be held by ScottishPower Energy Retail Ltd (“ScottishPower”), which is part of the ScottishPower Group.

More information on the ScottishPower Group can be found at **[scottishpower.com](https://scottishpower.com)**.

## Contact information

If you have a question on this PIN or how we use your personal information, please email **[dataprotection@scottishpower.com](mailto:dataprotection@scottishpower.com)** or write to us at ScottishPower Energy Retail, Data Protection, 320 St Vincent Street, Glasgow G2 5AD.

You have the right to lodge a complaint with our Data Protection Officer at **[dataprotection\\_corporate@scottishpower.com](mailto:dataprotection_corporate@scottishpower.com)** if you believe that your personal information is not being processed in line with this PIN.

If you are not satisfied with the response, you have the right to lodge a complaint with the Information Commissioner’s Office. Find out on their website how to report a concern at **[ico.org.uk/concerns](https://ico.org.uk/concerns)**.

## What personal information do we process about you?

We collect and process personal information about our customers and other individuals who we may interact with as part of our day to day business activities.

For the purposes of our relationship with you, we may process the following types of personal information:

- **Contact details** – this includes your name, address, telephone number and email address or those of any person named on your account

- **Account details** – this includes your unique account number/s, any passwords/codes (which may include biometric data such as your voice), details associated with any accounts you hold with the ScottishPower Group including tariff details, other people associated with your account, premises details, meter details, energy consumption, account balance, payment history and other information relevant to your account such as correspondence
- **Account history** – details of previous accounts held
- **Financial information** – information relating to debit/credit cards, direct debit or bank accounts that you use to pay for services
- **Details of complaints** – details of any complaints you may have submitted to us
- **Marketing and communication preferences** – this includes the preferences you have given us, your responses to marketing and other communications and information to help us understand your interests
- **Information about how you interact with us and use our services, and how these can be delivered and tailored to you** – this includes information about how you use our website and app, including information collected by cookies, as well as relevant demographic and lifestyle information, and information about your property which may be used to automatically suggest improvements to your customer experience – please see section **Automated decision making**
- **Your devices and location** – this includes information about your device and approximate location information provided by your IP address
- **Vulnerability information** – including information relating to any health conditions that may put you at increased risk and to help us provide any support as appropriate
- **Industry records** – we receive and provide industry flows and other information to industry bodies to meet requirements relating to, for example, smart metering and the Priority Services Register, to facilitate the change of supplier process and to help ensure you are charged correctly, and
- **Records of your contact with us** – including audio and video recordings and webchats

## Where we collect your personal information from

In order to provide you with our energy and related services we need to collect and use your personal information from a number of different sources, including:

### Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone
- When you use our websites, mobile device apps, or web chat services
- In emails and letters
- In customer surveys
- If you take part in our competitions or promotions

**Data we collect when you use our services. This includes the amount, frequency, type, location, sales route, and recipients:**

- Energy usage through smart meters and other connected premises devices
- Information about how you respond to email communications we have sent such as whether you have opened an email
- Online profile and usage data. This includes the profile you create to identify yourself with us when you connect to our internet, mobile and telephone services, e.g. through our mobile app. It also includes other data about how you use those services

**Data from third parties:**

- Other energy suppliers and OFGEM
- Energy network operators and other utilities such as water companies
- Credit Reference and Fraud Prevention Agencies
- Government and local councils
- Law enforcement agencies
- Public information sources such as Companies House
- Social media
- Companies that introduce you to us, including lead generators
- Comparison websites
- Landlords and housing associations, the Land Registry, and other public registers
- Loyalty scheme operators
- Market researchers
- Debt collection agencies
- Data and Insight Bureau
- The Energy Ombudsman
- Agents and contractors working on our behalf
- Installers and other partners working to support us in delivery of obligations placed on us by central, devolved or local government

## Who we share your personal information with

In order to provide our services to you, we need to provide your personal information to third parties who may be working on ScottishPower's behalf or where there is an appropriate legal basis to disclose your information to them. We share your information with the following categories of third parties:

- Credit Reference and Fraud Prevention Agencies
- Government departments and regulators such as OFGEM
- Law enforcement agencies
- The Energy Ombudsman
- Information Commissioner
- Any industry bodies set up to tackle energy theft
- Other energy suppliers
- People with whom you have authorised us to share your personal information
- Energy network operators and other utilities such as water companies
- Payment and Prepayment processing firms
- Customer Service, Sales and Debt partners, e.g. contact centres
- Print and design firms

- Customer research organisations
- Digital services providers
- Analytics providers
- Marketing and advertising partners
- Comparison websites
- Market researchers
- Metering and meter reading services
- Partners who help us meet our industry obligations for example in relation to energy efficiency
- Smart metering industry partners
- IT infrastructure support partners
- Audit firms
- Legal firms
- Locksmiths
- The Principal insurer(s) of our products
- Social service departments
- Charities
- Healthcare and other support organisations
- Companies who install any equipment required for the provision of our products and services
- If you have a debit, credit or charge card that you use with us we will share transaction details with companies which we need to use for us to provide this service (such as Visa and Mastercard and our Acquiring Bank)
- If you pay us by direct debit we will share your data via the Direct Debit Scheme
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers.

We never share your personal details with external companies for the purposes of marketing their products and services.

## How we use your personal information

As well as this PIN, your privacy is protected by law. ScottishPower is allowed to use personal information only if we have a proper reason to do so. This is called our 'lawful basis' for processing.

There are four main ways that ScottishPower is permitted to use your personal information:

- To fulfil our contractual commitments to you, or
- To meet our legal obligations, or
- When you consent to us using your personal information, or
- When it is in ScottishPower's legitimate interests.

Many of these uses are mandatory – in other words, where we need to use your personal information to meet our contractual obligations to you or to meet our legal obligations. We have provided more detail below on what personal information we use, why and which of the above categories we are relying on for each purpose.

We may use your personal information for more than one purpose, depending on the circumstances. We have listed the primary legal basis that we will typically rely on in the tables below. There may be situations where we rely on two legal bases as a matter of course to achieve the same or similar purposes. These include our fraud detection & prevention practices and those relating to direct

marketing and service communications. We have included these purposes in more than one table where there is a significant degree of overlap.

To fulfil some of the purposes, we will use automated decision making, in particular in respect of improving our customer services, minimising risk to your account, tailoring products and services to you and assessing your creditworthiness. For more information about this, please see the section on **Using your information to make automated decisions** below.

**To fulfil our contractual obligations to you**

Our purpose	Personal information used
To deliver our products and services to you.	Contact details. Account details. Account history. Financial information. Details of complaints. Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Records of your contact with us.
To correctly bill you for the services you use, and to deliver bills and other communications about your account to you.	Contact details. Account details. Financial information.
To tell you about your energy consumption, including where you have a smart meter.	Account details.
To provide you with information about your products and services.	Contact details. Account details. Information about how you interact with us and use our services, and how these can be delivered and tailored to you.
Service communications.	Contact details. Account details. Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Vulnerability information.

Our purpose	Personal information used
To provide you with useful information on your online account.	Contact details. Account details. Details of complaints. Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Marketing and communication preferences. Vulnerability information. Your devices and location.
To take payments from you and recover money that is owed to us.	Contact details. Account details. Account history. Financial information.
Delivery and installation of products and services.	Contact details. Account details.
To perform credit checks.	Contact details. Account details. Account history. Financial information.

## To meet our legal obligations

Our purpose	Personal information used
To meet our obligations in relation to installation of smart meters.	Contact details. Account details.
To comply with our licence conditions and government obligations.	Contact details. Account details. Account history. Details of complaints. Vulnerability information. Records of your contact with us.
To monitor and analyse our internal processes to ensure they are compliant with all applicable laws and regulations.	This could include any of the data categories listed in the <b>What personal information do we process about you?</b> section above.
To respond to statutory requests from public authorities including law enforcement.	Only the minimum information required that is relevant to the request.

Our purpose	Personal information used
For audit purposes, for example, to co-operate with Ofgem mandated audits.	Contact details. Account details. Account history. Details of complaints. Vulnerability information. Records of your contact with us.
To resolve your complaints.	Contact details. Account details. Details of complaints. Records of your contact with us.
Prevention and detection of fraud.	Contact details. Account details. Account history. Financial information. Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Your devices and location.

### Where you have consented

Our purpose	Personal information used
Obtaining access to half-hourly readings from your smart meter.	Account details.
To market products and services to you.	Account details. Contact details. Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Marketing and communication preferences.
Push notifications in the ScottishPower app.	Contact details. Your devices and location.
Collection of information from cookies on our website and app.	Information about how you interact with us and use our services, and how these can be delivered and tailored to you. Your devices and location.



## Where we have a legitimate interest

Purposes for which we use your personal information	Data we process for this purpose	Legitimate interest
Predict and develop new products and services that may suit you and the pricing of those products.	<ul style="list-style-type: none"> <li>• Contact details.</li> <li>• Account details.</li> <li>• Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> </ul>	To tailor our services to customers so they get the best value from our offering.
Analyse our interactions with you, including your payment patterns and account activity to improve our customer services.	<ul style="list-style-type: none"> <li>• Contact details.</li> <li>• Account details.</li> <li>• Account history.</li> <li>• Details of complaints.</li> <li>• Marketing and communication preferences.</li> <li>• Information about how you interact with us and use our services and how these can be delivered and tailored to you.</li> <li>• Vulnerability information.</li> <li>• Records of your contact with us.</li> </ul>	To understand customer expectations to maintain and improve our service in ways that best suit our customers.
For market research purposes.	<ul style="list-style-type: none"> <li>• Contact details.</li> <li>• Account details.</li> <li>• Details of complaints.</li> <li>• Information about how you interact with us and use our services and how these can be delivered and tailored to you.</li> </ul>	To obtain feedback from you about our products and services.
Testing computer systems.	<ul style="list-style-type: none"> <li>• Account details.</li> <li>• This will depend on the specific testing – we will always seek to avoid the use of personal information for testing and, if required, it will be kept to a minimum with appropriate controls in place.</li> </ul>	To replicate realistic circumstances to test computer systems for the purposes of keeping our systems secure, effective and operational.

Purposes for which we use your personal information	Data we process for this purpose	Legitimate interest
When you visit your online account we display products and services that are suitable for your circumstances.	<ul style="list-style-type: none"> <li>Account details.</li> <li>Account history.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Vulnerability information.</li> </ul>	To provide customers with information that is most relevant to their individual circumstances.
When you apply for products and services from us, we may check if we hold records for any previous outstanding debt with us.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account history.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Account details.</li> </ul>	To enable us to make responsible decisions about the payment options available to you.
When you apply for us to supply you with energy, we may need to check industry records, including records of any pending switches between suppliers prior to any application to us.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Industry records.</li> </ul>	To enable us to make responsible decisions about the payment options available to you.
Updating your credit file if you are late making payment or if you do not pay us what you owe.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> </ul>	To share information to help other lenders to make appropriate decisions on extending credit.
Prevention and detection of fraud.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> <li>Account history.</li> <li>Financial information.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Your devices and location.</li> </ul>	Reviewing your payment methods and patterns to identify and prevent any fraudulent activity in a way which is not strictly within the limits of our legal obligations but which is proportionate and necessary.
Developing techniques to identify and prevent financial crime.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Financial information.</li> </ul>	To increase effectiveness at identifying and reporting financial crime.

Purposes for which we use your personal information	Data we process for this purpose	Legitimate interest
Use of data for your well-being, particularly where you have particular needs.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> <li>Vulnerability information.</li> </ul>	Sharing information, including information about your health, with electricity and gas network operators and other limited bodies, including water companies, for the sole purpose of ensuring your wellbeing is prioritised, for example, during a power cut.
Direct marketing to customers, and to non-customers who have enquired about our products and services.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Marketing and communication preferences.</li> </ul>	<p>To market to you where you have a reasonable expectation that we will do so, and you have been given an opportunity to object and have not done so.</p> <p>We may use information we hold about you to personalise our marketing to you.</p> <p>We may also use your information to ensure your details are suppressed from future marketing, and to refresh your marketing preferences if it is justifiable to do so</p>
Service communications.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> </ul>	To provide you with information, other than direct marketing communications, that may be of interest to you as a customer in relation to the products and services we provide you. While this may not be strictly necessary for the performance of our contract with you, we will do this where we believe that it is necessary and proportionate to ensure effective communication in relation to the overall customer relationship.
When we send you electronic communications such as by email, we will monitor opening of emails and any links that are clicked.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Your devices and location.</li> </ul>	To enable us to measure the effectiveness of our communications with you.

Purposes for which we use your personal information	Data we process for this purpose	Legitimate interest
To alert you with important information about your tariff, product or service and your relationship with us.	<ul style="list-style-type: none"> <li>Contact details.</li> <li>Account details.</li> <li>These are normally the only details that would be used but other categories of personal information may be used in specific circumstances.</li> </ul>	To alert you to important information about your tariff, product or service and to help you manage your account more effectively.
Quality monitoring purposes.	<ul style="list-style-type: none"> <li>Account details.</li> <li>Details of complaints.</li> <li>Information about how you interact with us and use our services, and how these can be delivered and tailored to you.</li> <li>Records of your contact with us.</li> </ul>	To measure our performance and to continually improve our service.
Energy supply continuity.	<ul style="list-style-type: none"> <li>This will depend on the nature of the event that leads to us being provided with your data. We will keep you informed in any such case.</li> </ul>	We will process data held about you by another energy supplier in the event of a merger or acquisition, or a Supplier of Last Resort event to ensure the continuity of your energy supply.

We have determined, acting reasonably and considering the circumstances, that we are able to rely on legitimate interests as the lawful basis on which to process your personal information in certain circumstances (we have stated this above and set out our legitimate interests). We have reached this decision by carrying out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual.

We consider that it is reasonable for us to process your information for the purposes of our legitimate interests outlined above as: (a) we process your information only so far as is necessary for such purpose; and (b) it can be reasonably expected for us to process your information in this way.

## Using your information to make automated decisions

Many of our processes are automated to speed up our customer service and make our products and features more relevant to you. These processes do often lead to automated decisions being made; however these automated decisions do not introduce legal (or other similarly significant) effects on you (unless this is a necessary step to take when entering into a contract with you). You have a right to object to these automated decisions – see section **Controlling your personal information**, and each objection will be reviewed. Some examples of automated decision making are presented overleaf:

Process	Decision
Improving our services to you.	<p>We may carry out analysis across our phone, online, email, social and mobile communications with you, to better understand how we can make things easier for customers, for example, by finding out how and when it suits you to interact with us or the most appropriate method of payment.</p> <p>We may categorise your personal information so that when you call us or visit our online website or mobile app we can predict your most likely next request to improve our customer service to you. For example, if you have emailed a complaint to us then subsequently phone us, we may use the data we hold to direct you to the most likely appropriate team in the first instance.</p> <p>We may also use artificial intelligence technologies such as voice recognition to speed up our interactions with you and to assess the quality of our sales and services.</p>
Minimising risk to your account.	<p>We may use your personal information to undertake analysis of your payment patterns and account activity (online and offline) to build a picture of your use of our services and products. Where we detect unusual payment activity, we may put a hold on your account with us to allow us to investigate. This hold will not impact our delivery of energy to your premises. However, we may conduct further investigations as to the nature of the payment activity and seek additional clarifications from you to ensure any transactions are legitimate.</p> <p>Where we detect fraud, we may report this to the fraud prevention agencies, police, or financial regulator.</p>
Tailoring products and services for you.	<p>We may consider all aspects of the personal information we hold about you, such as your demographic, product history, location, financial status, how frequently you change products, your preferred communication status, your age, your marital status, your premises type, the lifestyle and occupation details we hold about you, and your prior consumption patterns – including half-hourly meter reads where we have your consent, to help us understand how you use our products. We do this so we can predict what products and services will suit you, and to offer you opportunities to act on these insights.</p> <p>We may use this analysis to offer you personalised price quotations, for example, we may assess when you use your energy so we can offer you “time of use” tariffs that may be cheaper to you.</p>
Online and connected premises products.	<p>When you visit your online account, we may utilise your preferences and our analysis of you to provide you with products and services that are suitable for your circumstances. To do this we will utilise your log-in information, ‘cookies’ on your computer, and the current products you take from us, to provide you with products and services that may be of interest to you.</p> <p>We will also assess your use of our connected premises products and services, such as smart energy meters, to allow us to assess and predict your anticipated future energy demand. Improved forecasting of customers energy usage will ultimately allow for cheaper ‘balancing’ of the energy grid by network operators which may result in lower-priced customer tariffs in the long run.</p>

Process	Decision
Credit assessment.	<p>We use Credit Reference Agencies to help prevent over indebtedness. Credit Reference Agencies generally do this by sharing personal information about borrowers and their financial history which helps lenders make responsible decisions about extending credit to borrowers. We will use Credit Reference Agencies to make automated decisions, for example, if you request a change from a prepayment meter to a credit meter.</p> <p>We will also use Credit Reference Agencies to assess your ability to pay us by credit. We may automatically choose to offer you alternative products when you first contact us based on this assessment.</p> <p>We may also check any records held by ScottishPower relating to previous accounts you have held with us to assess your ability to pay us by credit.</p>
Vulnerability.	Where we are aware you have particular needs, we will use this for the provision of additional support as appropriate.

## Credit Reference Agencies

When you are in the process of opening an account with us we may supply your personal information to Credit Reference Agencies (CRAs), and they will provide us with a credit score for you. We do this to assess creditworthiness and product suitability in order to offer you products which are most suitable to your personal financial situation.

We will also continue to exchange information about you with CRAs on an ongoing basis, including about any debts not fully repaid on time. CRAs will share your information with other organisations. When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

Your personal information will also be linked to the data of your spouse, any joint applicants or other financial associates, so you should make sure you discuss and share this information with them, before opening your account with us.

The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in the Credit Reference Agency Information Notice (CRAIN). More detail of this notice is available at:

- [experian.co.uk/crain](https://experian.co.uk/crain)
- [equifax.co.uk/crain](https://equifax.co.uk/crain)
- [transunion.co.uk/crain](https://transunion.co.uk/crain)

You can also obtain a copy of the CRAIN by contacting us.

## Fraud Prevention Agencies and Energy Theft

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We may use Fraud Prevention Agencies (FPAs) to help us with this.

If you give us false or inaccurate information and/or we suspect fraud on your account, we will record this and may also pass this information to FPAs and other organisations involved in the prevention of crime, fraud and/or money laundering.

FPAs may send personal information to countries outside the UK or the European Economic Area ('EEA'). When they do, there will be a contract in place to make sure the recipient protects the data to the same standard as the UK or the EEA. This may include following international frameworks for making data sharing secure.

To help identify theft of mains gas and/or electricity from the property, we will share details of your account, which may include information about alleged criminal offences, with the police, other law enforcement bodies and with any other industry body set up for the purposes of identifying and/or preventing energy theft.

## Sending data outside of the UK or the EEA (by us)

Your personal information will sometimes be transferred to third party organisations, some of whom may be located outside of the UK or the EEA, to facilitate provision of our services. For example, this could happen if any of our servers that store your personal information are located in a country outside of the UK or the EEA, or when one of our service providers is located in a country outside of the UK or the EEA, such as India or Australia. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK and EU data protection legislation.

We have agreements with these third party organisations that they will not use your personal information for any purposes other than those we have agreed with them. We explicitly require that any third party organisations that uses your personal information on our behalf implement adequate safeguards to protect your personal information, in accordance with the UK or EU GDPR (as applicable) and any other applicable UK and EU data protection legislation. For example, we may put contracts in place (which are approved by the European Commission and are known as "standard contractual clauses") with those service providers, or alternatively will ensure they have signed up to, and comply with, any other approved mechanisms that may become available to us in the future. We will also carry out an appropriate risk assessment of the laws and practices of the destination country to identify any technical and organisational measures that need to be put in place to ensure that your personal information is fully protected when in that country.

ScottishPower is part of the Iberdrola Group therefore all data transfers that occur within the Group are carried out in accordance with the applicable data protection laws and our Binding Corporate Rules (BCRs). The Iberdrola Group's BCRs reflect European legislation on data protection (General Data Protection Regulation) and means that all companies in our Group have to comply with the same internal rules. You can download a copy of the Iberdrola's BCR at [\*\*iberdrola.com/privacy-policy/binding-corporate-rules\*\*](https://iberdrola.com/privacy-policy/binding-corporate-rules).

## If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your account. It could mean that we cancel a product or service you have with us.

## Marketing

We wish to send you marketing communications about our products and services that may be relevant to you. We may also need to send you communications that are not direct marketing communications (service communications) from time to time. For more information on these, please see the section **Service communications and other communications** overleaf.

We will contact you, or businesses associated with you, with marketing messages if you have consented to them.

There may be circumstances when we can lawfully send marketing messages without your express consent, for example, where you have enquired about or have purchased products and services from us, and it is in our legitimate interests to get in touch with you about similar products and services (see the row entitled 'Direct marketing to customers and non-customers' in the legitimate interest table at the section entitled **How we use your personal information**). This means we may send marketing messages by different mediums to customers or prospective customers, including those who have shown an interest in our products or services, for example, by viewing a particular page on our website or by partly completing a quote for one of our products. You have a right to object to these marketing messages (please see section on **Controlling your personal information**). You are free to change your preferences at any time either online or by contacting us.

Where we rely on your consent, we may seek, or re-seek, your marketing consent any time there is a change in your relationship with us, including, where you investigate buying another product from us, move to a new house, seek to add an additional person to your account, where there is a change in law, where there is a structural change in our business, where your tariff changes, or your product or service expires.

If you decide to leave us we may contact you to allow us to market our products and services to you after you have left for up to two years.

## Social media and other digital platforms

We work with third party digital platforms, including Google, and social media companies, including Facebook and Instagram, to advertise our products and services, and also to prevent some or all of our customers from receiving advertising directed directly to them. This will take place on the social media and digital platforms where advertising space has been made available to us.

We will send your email address in scrambled encrypted form to social media companies who match this with scrambled versions of information they already hold. The social media site will then use this information either to exclude you from advertising (where, for example, the advertising relates to an electricity tariff that you already have) or to show you adverts for products or services that may be relevant to you (for example, to send you advertisements about boiler care if you are a gas and electricity customer). We will require that the social media companies have processes in place to prevent them from viewing your unscrambled email address and they will delete it immediately if there is no match.

Where there is a match, the social media sites may also use their records to create lists of people who, according to their records, share similar characteristics to you and who may be interested in ScottishPower products and services and we may show our advertising to those groups.



If you use social media services, please see their separate privacy policies which will describe their use of your personal information in more detail, including how you can opt out of this type of direct marketing.

## Service communications and other communications

We may from time to time need to send you service communications because we are legally or contractually required to do so, or because we need to provide you with important updates relating to our services. For example, we may contact you to provide information about your tariff, or tariffs like the one you are on, or about smart meters.

## Cookies

You can find out more about how we use cookies, and you can control which cookies we can place on your device, by visiting **[scottishpower.co.uk](https://scottishpower.co.uk)**.

## How long we keep your personal information

We will keep your personal information for as long as you are a customer of ScottishPower.

After you stop being a customer, unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations to allow us to respond to any questions or complaints you may have
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us and/or
- Retention periods in line with legal and regulatory requirements or guidance to show that we treated you fairly.

Appropriate safeguards will be implemented to protect your data, including where technical limitations restrict our ability to remove your personal information from our systems.

If you are not and have never been a customer, we will hold your information only for as long as we need it for the purposes for which it was collected.

In certain circumstances, you may be provided with privacy information which is in addition to that which is provided in this Privacy Information Notice and which will set out the relevant retention period. For example, if you enter a prize draw, specific privacy information may be provided to you which relates to how your data will be managed for that specific purpose.

## Your rights

### Obtaining your personal information

You have the right to obtain a copy of the personal information we hold about you:

#### Through your online account

Find details of the personal information we hold about you online including, the postal and supply address that we hold, historic bills and energy usage readings, and your contact preferences.

#### By emailing us

**dataprotection@scottishpower.com** (subject heading: Subject Access Request – Your Name, your Account Number)

#### By writing to us

Data Protection Team, Subject Access Request, ScottishPower Energy Retail Ltd,  
320 St Vincent Street, Glasgow G2 5AD.

## Data portability

You also have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations if this is technically feasible.

We are working within our industry to improve the way your data is shared.

## Correcting your personal information

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

#### By emailing us

**dataprotection@scottishpower.com** (subject heading: Right to Rectification – Your Name, your Account Number)

#### By writing to us

Data Protection Team, Right to Rectification, ScottishPower Energy Retail Ltd,  
320 St Vincent Street, Glasgow G2 5AD.

### Controlling your personal information

Data Protection law provides you with a number of rights in relation to how we can use your personal information.

- Right to erasure (right to be forgotten) – you have the right to request the deletion or removal of your personal information where there is no compelling reason for its continued processing by us.
- Right to restrict processing – you have the right to request that we block or suppress processing of your personal information.

- Right to object – you have the right to object to the processing of your personal information by us where the processing is based on our legitimate interests, is processed for direct marketing purposes (including profiling) or for the purposes of statistics.
- Rights related to automated decision making including profiling – you have the right not to be subject to automated decision making, including profiling. We can only carry out these activities where the decision is necessary for entry into the performance of a contract, authorised by a UK law to which we are subject or based on your explicit consent. More information about this can be found in the section entitled **Using your information to make automated decisions.**

If you have any questions about your rights, please contact us using the details provided in this PIN. The way individual requests are handled will depend on our purpose for processing your personal information and our lawful basis for doing so.

#### **By emailing us**

**dataprotection@scottishpower.com** (subject heading: Data Subject Rights – Your Name, your Account Number)

#### **By writing to us**

Data Protection Team, Data Subject Rights, ScottishPower Energy Retail Ltd,  
320 St Vincent Street, Glasgow G2 5AD.

Further information on your personal information rights is available on the Information Commissioner's website at **ico.org.uk**.

### **Withdrawing your consent**

Where we process personal information based on your consent, you have the right to withdraw this consent at any time. If you withdraw your consent, and we rely on it to use your personal information, we may not be able to provide certain products or services to you. You can unsubscribe from our marketing communications when we send them or contact us if you want to withdraw your consent. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal.

#### **Through your online account or mobile app**

Visit the **Your preferences** section of your online account to change your consent preferences at any time.

#### **By emailing us**

**contactus@scottishpower.co.uk**

#### **By writing to us**

Customer Services, ScottishPower Energy Retail Ltd, 320 St Vincent Street,  
Glasgow G2 5AD.

We will update changes to your consent preferences as soon as possible but there may be a time lag between the change being made or notified to us and the update being applied.

We understand the importance of keeping your personal details safe. To find out more, visit [getsafeonline.org](https://www.getsafeonline.org)

ScottishPower Energy Retail Limited  
Registered Office: 320 St. Vincent Street, Glasgow G2 5AD  
Registered in Scotland No. SC190287. VAT No. GB 659 3720 08  
[scottishpower.co.uk](https://www.scottishpower.co.uk)