

Data Protection Policy

Corporate Services, Data Protection

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The Board of Directors of Scottish Power Limited (the “**Company**”) has the power to design, assess and continuously revise the Governance and Sustainability System, and specifically to approve and update policies, which contain the guidelines governing the conduct of the Company and the companies belonging to the group of which the Company is the controlling entity, within the meaning established by law (“**ScottishPower**”).

In exercising these powers and within the framework of legal regulations, the *Articles of Association* and the *Purpose and Values of the Iberdrola Group*, the Board of Directors hereby approves this *Data Protection Policy* (the “**Policy**”), which respects, further develops and adapts the *Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group* with respect to the SP Group.

1. Purpose

The purpose of the Policy is to establish the key principles of conduct that govern ScottishPower’s approach to data protection and ensuring compliance with applicable legal provisions under all circumstances. In the UK, this includes the UK GDPR and the Data Protection Act 2018 (the “**UK Data Protection Legislation**”). These requirements apply to the processing of personal data by ScottishPower in the ordinary course of its business.

2. Policy Objectives

Everyone has rights with regards to the way in which their personal data is handled. During the course of its activities, ScottishPower collects, stores and processes personal data about its customers, suppliers, employees and other third parties. ScottishPower recognises that the correct and lawful treatment of this personal data is necessary for compliance with the UK Data Protection Legislation and will also maintain confidence in the organisation and provide opportunities for successful business operations.

ScottishPower has designed a range of policies, rules, procedures and guidance documents to protect the security and integrity of personal data held by ScottishPower, including this Policy (the “**Policies**”). The Scottish Power Limited Board of Directors and senior management team require all employees, contractors, suppliers and third parties to fully comply with the Policies, rules and procedures and failure to do so may result in action e.g., in the case of an employee, it may result in disciplinary action.

3. Personal Data

The Policies relate to the protection of personal data. This is any data from which a living individual can be recognised (with each identifiable individual being a “**Data Subject**”). Common examples of personal data held by ScottishPower includes: customer contact details, customer financial data, credit check data for both customers and employees,

prospective employee application data, employee personnel records and personal details of individuals from suppliers and other third parties that ScottishPower may work with.

In certain circumstances, ScottishPower may also process Special Category data, which includes data about an individual's physical or mental health or condition, their racial or ethnic origin, their religious views / beliefs, sexual orientation, trade union membership and criminal background.

4. Data Protection Principles

As referred to above, ScottishPower is accountable for its compliance with the following fundamental data protection principles:

- I. Personal data should be processed lawfully, fairly and in a transparent manner.
- II. Personal data should be collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
- III. Personal data should be adequate, relevant, and limited to what is necessary in relation to the purpose(s) for which it is processed.
- IV. Personal data should be accurate and, where necessary, kept up to date.
- V. Personal data should be kept for no longer than is necessary for the purpose(s) for which it is processed.
- VI. Personal data should be processed in a manner that ensures appropriate security of the personal data.

5. Data Subject Rights

ScottishPower is also required to enable Data Subjects to exercise the following rights in respect of their personal data:

- I. The right to be informed about the processing of their personal data – ScottishPower must ensure that all Data Subjects are informed about the ways in which their Personal Data is being processed and the other rights they have in relation to this processing. ScottishPower therefore publishes privacy notices on its websites and provides Data Subjects with additional notices where required.
- II. The right to access a copy of their personal data.
- III. The right to have any inaccuracies in their personal data rectified.

- IV. The right to have their personal data erased in certain circumstances (such as where the personal data no longer needs to be processed in relation to the purpose(s) for which it was collected).
- V. The right to have the processing of their personal data restricted in certain circumstances (such as where the personal data does not need to continue to be processed but the individual does not want their data to be permanently erased).
- VI. The right to receive their personal data, which they have provided to ScottishPower, in an easily-portable format and to have that data transmitted to another party in certain circumstances, e.g., when asked by a customer to transfer the data to another energy provider, ScottishPower would provide the data in a format that is machine readable.
- VII. The right to object to certain types of processing (such as profiling).
- VIII. The right not to be subject to a decision based solely on automated processing of personal data.

ScottishPower has procedures in place to enable Data Subjects to exercise their rights appropriately across its different business units. These include a Procedure for Privacy Notices and Consent and a Procedure for the Exercise of Rights.

It is imperative that any correspondence received from an individual about exercising their data protection rights is immediately referred to the relevant Data Protection Manager or the Data Protection Officer using the details noted at Section 13.

6. Data Protection Complaints

ScottishPower recognises the importance of individuals' data protection rights and has established procedures to ensure that complaints relating to the processing of personal data are managed fairly and consistently.

Any individual who considers that their personal data has been processed unlawfully, unfairly, or otherwise in a manner that does not comply with applicable data protection legislation has the right to raise a complaint. ScottishPower treats all such concerns seriously and will ensure they are reviewed appropriately and investigated thoroughly.

ScottishPower aims to address complaints promptly, transparently and impartially, while keeping individuals appropriately informed throughout the process. Where issues are identified, appropriate remedial action will be taken and lessons learned will be used to strengthen ScottishPower's handling of personal data. Individuals will also be advised of any further options available to them should they remain dissatisfied with the outcome.

7. Data Protection by Design & Default

ScottishPower has a procedure that must be considered when going through the process of developing or procuring new products or services that will process personal data, e.g., a new processing activity or the development of a new software application, including situations in which these are contracted by third parties.

It is prohibited to purchase or obtain personal data from unlawful sources, from sources that do not sufficiently ensure the lawful origin of such data or from sources whose data have been collected or transferred in violation of the data protection legislation.

8. Processing Activity Register & Impact Assessments

ScottishPower captures all processes which involve the processing of personal data in its Processing Activity Register (“**PAR**”). The PAR is held and updated by ScottishPower to ensure compliance with its obligations under the UK Data Protection Legislation. The PAR captures details such as the categories of personal data, the purpose of the processing, any processing carried out by third parties, the systems involved in the processing, the lawful basis etc. If it is identified that the processing of certain personal data is deemed ‘high risk’ to the rights and freedoms of Data Subjects, ScottishPower will complete a Data Protection Impact Assessment (“**DPIA**”) to identify and minimise any data protection risks associated with that particular high risk processing.

9. International Data Transfers

ScottishPower will only transfer personal data outside of the UK and EEA when it is legally permitted to do so and in compliance with the UK Data Protection Legislation. When ScottishPower shares personal data with third parties in countries outside of the UK and EEA, it will assess the transfer (including the data protection laws, customs and practices in the country of destination) and will put in place any required contractual arrangements, including any necessary safeguards including the UK’s International Data Transfer Agreement, or the EU’s Standard Contractual Clauses and the UK Addendum.

Iberdrola has implemented Binding Corporate Rules (“**BCRs**”) which permit international transfers of personal data between Iberdrola Group companies for the type of international transfers specified in the BCRs, e.g. employee personal data.

These BCRs have been approved by the Spanish Data Protection Agency and are binding on all Iberdrola Group companies (including the ScottishPower Group). The BCRs and the list

of Iberdrola entities who have signed up to them are available on our and Iberdrola's websites.

10. Third Party Engagement

Where ScottishPower engages a third party to process personal data, it will conduct all necessary due diligence and ensure agreements and contracts provide appropriate protection to the personal data. ScottishPower will do this both when appointing a third party to process personal data on its behalf or when sharing personal data with a third party who is processing personal data for its own purposes.

ScottishPower has a Procedure for Data Protection in Procurement which must be followed to ensure that any data sharing complies with the UK Data Protection Legislation and any applicable regulatory guidance.

11. Report Concerns & Data Breaches

ScottishPower could face significant repercussions if it fails to comply with its obligations under the UK Data Protection Legislation. The UK Information Commissioner's Office ("**ICO**") has statutory powers and authority to issue significant fines for breaches of the UK Data Protection Legislation.

It is imperative that employees understand and comply with the Policies, and work to ensure that contractors, suppliers and other third parties with whom ScottishPower deals do likewise. Any questions or concerns regarding the Policies or our compliance with them should immediately be referred to the relevant Data Protection Manager or the Data Protection Officer using the details noted at Section 13.

ScottishPower has an Incident Response Procedure in place which sets out the action to be taken in the event of any accidental or illegal destruction, loss or alteration of personal data, or any unauthorised processing of personal data for which ScottishPower is responsible (a "**Personal Data Breach**"). Accordingly if an employee (whether directly or indirectly through a contractor, supplier or other third party) becomes aware or suspects that a Personal Data Breach has occurred (or is occurring), the issue must be immediately reported to the responsible business area's Data Protection Manager or the Company's Data Protection Officer, using the details noted at Section 13.

Failure to comply with the terms of our Policies may result in action being taken, e.g., in the case of an employee, this may result in disciplinary action.

12. Training

ScottishPower requires all staff to undertake mandatory training on Data Protection and Binding Corporate Rules. In addition, all staff are required to undertake regular refresher training.

13. Implementation & Monitoring

ScottishPower's Data Protection Officer can be contacted at dataprotection_corporate@scottishpower.com. The Data Protection Officer is responsible for the day-to-day oversight of the Policies and is responsible for monitoring and reporting compliance with the Policies to ScottishPower Limited's Board of Directors. The Data Protection Officer is also responsible for liaising with the ICO regarding ScottishPower's data protection compliance and accountability.

All departments within ScottishPower must implement and observe the Policies. Any questions or concerns about the Policies or their implementation in a specific area or department, or relating to any specific data protection responsibilities or considerations which may apply, should be referred to the Data Protection Manager for that area or department in the first instance, if the Data Protection Manager is unavailable, the questions or concerns should be referred to the Data Protection Officer.

Business Data Protection Managers can be contacted at the following:

ScottishPower Energy Retail:- DataProtection@scottishpower.com

SP Energy Networks:- dp@spenergynetworks.co.uk

SP Renewables Onshore:- dataprotection_onshorerenewables@scottishpower.com

SP Renewables Offshore:- offshoredataprotection@scottishpower.com

SP Corporate:- dataprotection_corporate@scottishpower.com

Sphere Energy Connect:- dataprotection@sphere-connections.co.uk

SP Electricity North West:- DataProtection@enwl.co.uk

Regular audits shall also be performed with internal or external auditors in order to verify compliance with this *Policy*.

14. Iberdrola Group Coordination

ScottishPower's Data Protection Officer shall coordinate with the Security and Resilience Division of Iberdrola, S.A. regarding Iberdrola Group-level coordination of the practices and management of risks in the area of personal data protection.

In addition, the businesses and corporate divisions of ScottishPower must (i) appoint the persons responsible for personal data protection, who shall act on a coordinated basis and under the supervision of the Corporate Security Division (or such division as assumes the powers thereof at any time); and (ii) coordinate with the Corporate Security Division (or such

division as assumes the powers thereof at any time) any activity that involves or entails the management of personal data.

15. Further Information

More information about the UK Data Protection Legislation can also be found at the ICO's website: <https://ico.org.uk/>.