



## **PRIVACY NOTICE**

### **EMPOWER PROGRAMME**

In accordance with relevant Data Protection Legislation (including the UK GDPR and the Data Protection Act 2018), ScottishPower, incorporated in Scotland (registered number SC193794) and having its registered office at 320 St Vincent Street, Glasgow, G2 5AD, will process personal data as part of its pre-employment programmes. This Privacy Notice specifically relates to the Empower Programme and explains how ScottishPower processes personal data relating to individuals (hereinafter referred to as “participants”) who apply for the Empower Programme. ScottishPower acts as an independent data controller for the personal data processed under this programme. Any reference in this Privacy Notice to “we”, “our” or “us” refers to ScottishPower, and “you” or “your” refers to an Empower Programme participant.

#### **PURPOSE**

The Empower Programme supports Ex-military- veterans transitioning into civilian roles by providing structured development, access to placements and skills building opportunities. We process personal data for the purpose of:

- Reviewing applications
- Conducting assessments and interviews
- Communicating programme outcomes
- Delivering programme activities
- Organising placements or training
- Preparing contracts where required

#### **WHAT DATA DO WE PROCESS?**

ScottishPower may process the following personal data:

- Participant name
- Contact details
- Academic information
- Employment and military service history
- CV and application materials
- Assessment and interview information
- Training participation records
- Notes taken by ScottishPower during assessment and development discussions

## LAWFUL BASIS FOR PROCESSING

We rely on the following legal bases:

- **Legitimate Interests** to review applications, assess suitability, support veteran career transition, develop future workforce capability and deliver programme activities.
- **Contractual Necessity** to take steps prior to entering placement or employment contracts.
- **Legal Obligations** including identity, right-to-work- or safeguarding checks.

## HOW WE USE YOUR DATA

Your personal data is used to:

- Review and assess your programme application
- Conduct interviews and assessments
- Provide feedback and communicate programme decisions
- Deliver programme activities, workshops and development support
- Arrange any placement or training opportunities
- Prepare contracts or onboarding documentation where required

We do not use your data for marketing or for purposes unrelated to the Empower Programme.

## SHARING YOUR DATA

We only share your personal data where necessary and always securely. Your data may be shared with:

- ScottishPower Early Careers/Recruitment teams
- ScottishPower hiring managers and programme mentors
- HR teams issuing contracts and onboarding materials
- Approved third-party- service providers supporting assessments or training.

We do not share your data outside ScottishPower unless required by law.

## DATA SECURITY

We implement robust technical and organisational measures to safeguard your personal data against unauthorised access, loss, or misuse. Access is strictly limited to authorised ScottishPower personnel and governed by confidentiality agreements.

## DATA RETENTION

- *Unsuccessful participants:* personal data is retained for up to 6 months following the issue of an unsuccessful outcome letter.

- *Successful participants*: data is retained for the duration of the placement and, thereafter, according to our employee records retention schedule.

## AUTOMATED DECISION MAKING

No automated decision making or profiling is carried out as part of this processing activity. All decisions involving your personal data are made by ScottishPower staff.

## INTERNATIONAL DATA TRANSFERS

Your data will be processed and stored within the UK or European Economic Area (EEA). Where data is transferred outside of these regions, appropriate safeguards will be applied. ScottishPower is part of the Iberdrola Group. All intra-group data transfers are governed by Binding Corporate Rules (BCRs), which reflect European data protection standards. You can access Iberdrola's BCRs at: <https://www.iberdrola.com/privacy-policy>

## YOUR RIGHTS

Under Data Protection Legislation, you have the following rights:

- **Your right of access** - you have the right to ask us for copies of your personal information.
- **Your right to rectification** - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - you have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - you have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - where consent is the legal basis for the processing of your personal data, you have the right to withdraw this consent at any time. This will not affect the lawfulness of any processing we may have undertaken based on your consent before it is withdrawn.
- **Right to complain** – You have the right to raise a concern with us if you believe your personal data has been handled improperly or in a way that does not comply with data protection legislation. To understand how we will manage and respond to your data protection complaint, please refer to our Data Protection Complaints Procedure, available here: [Security UK - Data Protection Complaints](#)  
If you wish to submit a complaint, you can do so using our dedicated Data Protection Complaint Form: [Data Protection Complaint Form](#)

**How To Contact Us:**

You can contact the *People & Organisation Data Protection team* by email:

[dataprotection\\_po@scottishpower.com](mailto:dataprotection_po@scottishpower.com)

You can contact our *Data Protection Officer* by email:

[dataprotection\\_corporate@scottishpower.com](mailto:dataprotection_corporate@scottishpower.com), or in writing:

Data Protection Officer  
Corporate Security  
Scottish Power UK  
320 St Vincent Street  
Glasgow, G2 5AD

If you remain unsatisfied with our response to your complaint, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) by contacting:

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

Or Tel: 0303 123 111

Website: <https://www.ico.org.uk>

**Date of Privacy Notice: June 2026.**