



PRIVACY NOTICE

RETURNERS 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) 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 explains how ScottishPower processes personal data relating to individuals (“participants”) who apply for or take part in the Returner Programme. Any reference made in this Privacy Notice to the term(s), “we”, “our” or “us” refers to ScottishPower and "you" and "your" (and other similar terms) mean the Returner Programme participant.

PURPOSE

ScottishPower provides the Returner Programme to support individuals who have taken a career break of 12 months or more and wish to re-enter the STEM industry. The programme offers structured support, development opportunities and workplace experience to refresh participants’ skills and confidence.

WHAT DATA DO WE PROCESS?

- ScottishPower may process the following participant data:
- Name, address and contact details
- Application form, CV and supporting documents
- Work history and details of your career break
- Interview and assessment records
- Academic or professional qualification information
- onboarding information
- Development, training and engagement records

LAWFUL BASIS FOR PROCESSING

We process your personal data on the following bases:

Legitimate Interests- reviewing and assessing participants, communicating with participants, and administering the Returner Programme to support re-entry into the STEM industry and contribute to workforce planning.

Contractual Necessity- where we need to take steps before entering into programme-related documentation or agreements, including onboarding and placement arrangements.

Legal Obligations - including identity verification, right-to-work checks and compliance with employment-related legislation.

HOW WE USE YOUR DATA

ScottishPower uses your personal data to:

- Review and assess your application
- Verify eligibility and relevant experience
- Conduct interviews and assessments
- Communicate outcomes and onboarding requirements
- Deliver structured support, training and mentoring
- Support your development during the programme
- Maintain programme records and meet legal obligations

Your data will not be used for marketing or unrelated purposes.

SHARING YOUR DATA

- We will only share your personal data where it is necessary for the intended purpose. We will ensure that all personal data is shared securely. We may share your data with:
 - ScottishPower Early Careers and Recruitment teams
 - Hiring managers, mentors and programme coordinators
 - HR teams responsible for onboarding
 - Approved third-party providers supporting assessments or programme delivery.
 - Government or regulatory bodies where required by law

We do not share your data with third parties for marketing.

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:

Internal: [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](#)

External: [SP Complaints Procedure](#)

How To Contact Us:

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

dataprotection_po@scottishpower.com

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

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