

Data Rights Request Privacy Notice

This privacy notice describes how Scottish Power UK Plc and/or its subsidiaries (together “Scottish Power”), having its registered headquarters at 320 St Vincent Street, Glasgow, G2 5AD (“we” or “us”), processes the personal data of individuals who have exercised their rights under the UK GDPR or have submitted a complaint regarding the processing of their personal data (hereafter “you”).

This privacy notice contains important information about what personal details we collect; what we do with that information and the lawful basis; who we may share it with and why; and your data protection rights.

What Personal Data do we collect and process?

In order to communicate with you, we may process the following information;

- Personal data - name, contact number, email address, postal address (if chosen contact method)

To allow us to verify your identity, we may process the following information

- Identification data – copy of
 - photographic ID
 - utility bill
 - other documents requested for proof of name
- Employment data – Employee number., National Insurance number, Date of Birth
- Account identifiers such as account number or meter point reference number (MPAN)

While processing your request, or investigating your complaint, we may process a wide variety of data depending on what personal data we already process, your relationship with ScottishPower and the type of request made or concern raised.

This may include data relating to;

- Academic and professional life (e.g. CV, training records etc)
- Personal life (e.g. marital status, nationality etc)
- Social data (lifestyle and hobbies, housing status etc)
- Employment particulars (job position, career details etc)
- Financial and transactional data (bank details, tax data, income etc)
- Location data (data about places visited, IP Geolocation)
- Data relating to criminal offences (criminal record reports)
- Special category data (health data, trade union membership, religious/philosophical beliefs, political beliefs, race/ethnic origin, sexuality/sex life)

How do we use your personal data?

Under Article 6 of GDPR (Lawfulness of Processing), we must have a lawful basis for processing your personal data. We process your personal data for a number of purposes related to responding fully to your request(s) or fully investigating your complaint. The reasons and lawful bases are laid out below.

Purpose	Lawful Basis under Article 6 GDPR
Communication with requester/complainant , including responding to request(s)	Legal obligation Rights Requests - we have a legal obligation under Data Protection Act 2018 and UK General Data Protection Regulation to respond to requests to exercise rights laid out in this legislation. Complaints – we have a legal obligation under the Data Use and Access Act 2025 to respond to data protection complaints and keep the complainant informed.
Verifying identity of requesters	Legitimate interest – we have a legitimate interest to ensure the security of data by verifying the identity of requesters and complainants
Collection and review of data before response	Legal obligation – We are legally required under the Data Protection Act 2018 and the UK General Data Protection Regulation to provide any data requested under the right of access. Review is required to ensure only personal data of the requester is provided. Special Category Lawful Basis: 2(f) processing is necessary for the establishment, exercise or defence of legal claims in relation to fulfilling the obligations and exercising the specific rights of the data subject.
Investigation and review of data related to complaint	Legal obligation – We are legally required under the Data Use and Access Act 2025 to investigate and respond to data protection complaints. Special Category Lawful Basis: 2(f) processing is necessary for the establishment, exercise or defence of legal claims in relation to fulfilling the obligations and exercising the specific rights of the data subject.

We have in place appropriate technical and organisational security measures to protect your personal data against unauthorised or unlawful use, and against accidental loss, damage or destruction.

Who do we share your personal data with?

ScottishPower engage with data processors who are third parties i.e. consultants, contractors and suppliers. These third parties provide elements of our services for us. In relation to this specific process, we use a third-party data processor, OneTrust, who provide us with a platform for us to manage all right requests and complaints.

We have agreements in place with our data processors that restrict the purposes for which they can process the personal data, and we will only share personal data that is required to enable them to perform these services. We will not pass any personal data collected to third parties for marketing purposes.

We may share personal data in certain circumstances with another member of our ScottishPower group, meaning our holding company and its subsidiaries.

ScottishPower Group companies are part of the Iberdrola Group. In the course of reviewing and responding to data subject requests, in order to fulfil the purposes listed in this privacy notice, we may share your personal data with other companies within IBERDROLA S.A. Group.

When we are required to share personal data, we will take appropriate measures to ensure we have a lawful basis to share the data, that we provide only the personal data which is required for the purpose and to provide this data securely.

How long do we keep your personal data?

We have in place a data retention process so that personal data is not stored or processed for any longer than necessary. How long we keep personal data will depend on the purpose(s) for which it was originally collected.

Personal data collected for only the purpose of verifying identity (e.g. copy of passport, utility bill etc) will be deleted as soon as ID verification is complete.

Personal data collected for the purpose processing and responding to a data subject rights request and data protection complaints will be held for 6 years after the date of request closure.

International Transfer of Personal Data

Your personal data will be processed and stored within the UK or the European Economic Area (EEA). In any instances where this data is to be transferred outside of these areas, we will implement appropriate safeguards and security measures to ensure the protection of your personal data.

ScottishPower Group companies are part of the Iberdrola Group and as such any 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) which means

that all companies in our Group must comply with the same internal rules. You can view a copy of the Iberdrola BCR's [here](#).

Your Rights

In accordance with Data Protection Legislation, you can exercise any of the following rights by contacting us as detailed under “How to contact us”

- Right of **access** – you have the right to obtain confirmation of what personal data is being processed and to receive a copy of this personal data.
- Right to **rectification** – you have the right to have your personal data rectified if it is inaccurate or incomplete.
- Right to **erasure** (Right to be forgotten) – you have the right to request the deletion or removal of your personal data where there is no lawful basis for its continued processing.
- Right to **restrict processing** – you have the right to request that we block or suppress processing of your personal data.
- Right to **object** to processing – you have the right to object to the processing of your personal data, under certain circumstances.
- Right to data **portability** – you have the right to obtain and reuse your personal data for your own purposes across different services.
- Right to **withdraw consent** - where consent is the lawful 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: [SP Complaints Procedure](#)
 - If you wish to submit a complaint, you can do so using our dedicated Data Protection Complaint Forms linked below

How to contact us

ScottishPower Energy Retail

- DataProtection@ScottishPower.com
- [Data Protection Complaint form](#)

SP Energy Networks

- [Data Subject Rights form](#)
- [Data Protection Complaint form](#)

ScottishPower Renewables

- [Data Subject Rights form](#)
- [Data Protection Complaint form](#)

ScottishPower UK - People & Organisation (HR) -

dataprotection_po@scottishpower.com

ScottishPower UK (All other Corporate Functions & ScottishPower Foundation) –

- Email- dataprotection_corporate@scottishpower.com
- [Data Protection Complaint form](#)

You can contact our Data Protection Officer at dataprotection_corporate@scottishpower.com or 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