



PRIVACY NOTICE

SUMMER PLACEMENT

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 specifically relates to the Summer Placement Programme and explains how ScottishPower processes personal data relating to individuals (hereinafter referred to as “participants”) who apply for or take part in the 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 Power Academy participant.

PURPOSE

ScottishPower provides the Summer Placement Programme to offer students in education the opportunity to gain good quality work experience within the industry or discipline they are studying. The placement typically lasts around 12 weeks and is designed to support participants in developing practical skills, applying academic learning in a real-world environment and exploring potential future career pathways.

How ScottishPower Receives Your Personal Data

The way ScottishPower receives your personal data depends on the route through which you apply:

External Partner / University Application Route

- If your application is submitted through an external partner (such as a university careers service or placement coordinator), the external organisation acts as the data controller during the initial application stage, including the first sift and eligibility screening.
- ScottishPower only receives personal data for applicants who progress beyond the external partner’s initial sift, at which point ScottishPower becomes an independent data controller for the data shared.

Direct Application Route

- If your application is submitted directly via the ScottishPower recruitment system, ScottishPower acts as the independent data controller from the point you apply.
- ScottishPower conducts the full sift, assessment and selection process.

WHAT DATA DO WE PROCESS?

ScottishPower may process the following participant data:

- Participant name
- Contact details
- Academic information
- University records
- CV and application materials
- Interview and/or assessment information
- Notes recorded during ScottishPower's sift and/or interviews

LAWFUL BASIS FOR PROCESSING

We process your personal data under the following legal bases:

- **Legitimate Interests**- to review and assess applications, communicate with participants, match applicants to opportunities and support workforce planning.
- **Contractual Necessity**- where we need to take steps prior to entering into a placement agreement.
- **Legal Obligations**- including right-to-work checks and compliance with employment-related legislation.

HOW WE USE YOUR DATA

ScottishPower uses your personal data to:

- Reviewing and assessing applications
- Verifying eligibility for the placement
- Conducting interviews and assessments
- Communicating decisions and next steps
- Matching participants to suitable business areas
- Preparing and issuing placement documentation
- Delivering onboarding activities
- Supporting you throughout the placement, including performance and development monitoring
- Meeting legal and regulatory obligations

Your personal data is processed solely for the purpose of administering and delivering the Summer Placement Programme and is not used for marketing or unrelated activities.

SHARING YOUR DATA

Your data may be shared only where necessary and always securely, including with:

- ScottishPower Early Careers / Recruitment teams
- Hiring managers and supervisors involved in the placement
- HR teams issuing contracts or onboarding documents

- Approved third-party service providers supporting pre-employment or assessment activity
- Academic institutions, where required to confirm participation or outcomes
- Regulatory or government bodies where legally required

ScottishPower does not share your personal data with external organisations 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.