

SSE Wholesale Privacy Notice

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About us

We are SSE plc (SC117119) of Inveralmond House, 200 Dunkeld Road, Perth, Perthshire, PH1 3AQ. We are subject to the laws of Scotland.

We use your information as further explained in this Privacy Notice. We'll be the "controller" of the information you provide to us.

In addition to SSE plc, for the specific business areas outlined below, other SSE companies will be also controllers of your personal information:

- **Beatrice Offshore Windfarm Limited** of Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ
- **Keadby Generation Limited** of SSE Plc, Keadby Power Station Trentside, Keadby, Scunthorpe, United Kingdom, DN17 3EF
- **SSE Airtricity Energy Supply (Northern Ireland) Limited** of Millennium House, 17-25 Great Victoria Street, Belfast, Northern Ireland, BT2 7AQ
- **SSE Airtricity Gas Supply (NI) Limited** of Millennium House, 17-25 Great Victoria Street, Belfast, Northern Ireland, BT2 7AQ
- **SSE Enterprise Energy Solutions**, which is the trading name of TESGL Limited, Ocean Court, Caspian Road, Atlantic Street, Altrincham, WA14 5HH
- **SSE Energy Supply Limited** of No.1 Forbury Place, 43 Forbury Road, Reading, United Kingdom, RG1 3JH
- **SSE EPM Limited** - of No.1 Forbury Place, 43 Forbury Road, Reading RG1 3JH
- **SSE Generation Limited** of No.1 Forbury Place, 43 Forbury Road, Reading, United Kingdom, RG1 3JH
- **SSE Hornsea Limited** of No.1 Forbury Place, 43 Forbury Road, Reading, United Kingdom, RG1 3JH
- **SSE Trading Limited** of No.1 Forbury Place, 43 Forbury Road, Reading, United Kingdom, RG1 3JH

Each of which are, together with SSE plc, are referred to as "**SSE**", "**we**" or "**us**" throughout this Privacy Notice.

What information do we need?

We collect the following personal data about you:

- Name, Address, Telephone Number and Email Address;
- Payment Details including bank details;
- When using our website, your IP address, location information and browsing information;
- Your preferences for communications e.g. by telephone, fax, SMS, email or post;
- Details of your participation in surveys;
- Details of your interactions with us on social media;
- Details of any vulnerabilities so we can adapt our services appropriately; and
- If you contact us by telephone, we may record the call for training and service improvement purposes, and make notes in relation to your call.

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information, for example, credit agencies, search information providers and / or public sources. We may also be provided with information about you by a previous tenant, or a third-party intermediary (TPI) who is authorised to act on your behalf. As a renewable and thermal energy generator and provider, SSE works closely with including with third parties, sub-contractors and other regulatory bodies including the Office of Gas and Electricity Markets (“Ofgem”).

Why do we need it?

We need to know your basic personal data to be able to supply your business with energy and services, maintain and operate our electricity generation assets and gas storage facilities and manage our energy portfolio. In particular, we need to know your basic personal data to provide our services to you, direct any customer enquiries to the correct SSE support team, to allow our engineers to support you on-site and to communicate and conduct business with you. We may also collect specific information in order to enter into legal contracts with you.

Legal bases for processing

In order to process and use your personal information lawfully, we rely on the following legal bases:

- for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract;
- to comply with our legal obligations;
- for our legitimate interests in ensuring effective operational management and internal administration, document retention/storage, compliance with regulatory guidance, exercise or defence of legal claims, service improvement and communicating with you; and
- consent (where we market to you via email or SMS, or where we store vulnerability information).

What do we do with it?

The personal data is processed by our staff to:

- Provide, maintain, adapt, protect and improve any products and services you have requested from us;
- Perform our obligations under any contract for the supply of services we have with you;
- Manage our relationship with you through customer services and support activities;
- Provide you with any information that we are required to send you in accordance with our regulatory or legal obligations;
- Detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights, including liaison with regulators and law enforcement agencies, etc.;
- Communicate with you by telephone, mail, email or other electronic means and obtain feedback on how we can improve our services;
- Monitor, measure, improve and protect the content of our websites and services to provide enhanced and personal user experience for you;
- Deliver targeted advertising, marketing or information to you which may be useful to you, based on your use of our services;
- Compare information for accuracy and to verify it with third parties, for example credit reference agencies; *and*
- Deliver joint content and services with third parties with whom you have a separate relationship.

Who do we share it with?

We may share your information with:

- Ofgem, the Energy Ombudsman and any other regulatory authority we may be subject to for the purposes of demonstrating compliance with applicable law and regulations;
- KPMG, our Corporate Auditor for the purposes of demonstrating compliance with financial and regulatory frameworks;
- Our sub-contractors for the purposes of carrying out work on our behalf;
- Our service providers for the purposes of providing services to us;
- Other SSE group companies for the purposes of account administration, payment management and strategy development;
- Third party intermediaries, where you have engaged their services; and
- Debt collection agencies for the purposes of debt management.

We may also use aggregate information and statistics in order to help us develop our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

Marketing

Unless you've asked us not to, we may contact you in writing, by phone and (where you have consented) via email or SMS with information on products, services and rewards that we, other companies within the SSE group, and occasionally our carefully selected partners identified at the time we collect your information, offer. We may use third parties to send marketing communications.

Unless you have asked us not to, we may also use your email address to show you digital advertisements via search engine results pages or on other websites.

Unless you have asked us not to, we may profile your data to provide you with marketing and offers that are relevant to you. If you opt out of profiling we will still run analysis that includes your data, but any decisions or marketing output that result from that analysis will not be used to market to you. You will be sent generic marketing that may not be relevant to you.

Where you partially complete and/or abandon any information inputted into our website and/or other online forms, we may use this information to contact you to remind you to complete any outstanding information and/or for marketing purposes.

To opt out of receiving marketing messages, or to object to our use of profiling for direct marketing purposes, please contact us at any time verbally, by email or in writing using the details in the "*Contacting Us*" section below.

How long will we keep it?

We will keep your information only for as long as necessary depending on the purpose for which it was provided.

When determining the relevant retention periods, we will take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Credit Checking and Automated Decision-Making

We may supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>

We may take credit scoring information into account when deciding the conditions placed upon your supply, including any premium to be added or security deposit required. In the majority of cases, we will also consider other information that we hold about you, and this decision will not be fully automated. Please note that businesses that we consider to be in higher risk industries will have a premium added.

We use automated decision-making to determine the conditions upon which we supply you in the following circumstances:

- Customers whose businesses are insolvent or no longer trading
If your business is insolvent or no longer trading, we will automatically refuse to supply you.
- New connections customers with a supply larger than 23kVA
For new connections customers with a supply larger than 23kVA, we will use credit scoring information supplied by a third-party credit agency to determine whether a security deposit is appropriate.

You can appeal any automated decision, receive an explanation of the decision or require human review of the decision by getting in touch using the details in the "*Contacting Us*" section below.

How is your personal information transferred outside the EEA?

We, or a third party who we share personal information with, may host, store and handle that personal information outside of the European Economic Area (EEA).

We will only permit this to happen if adequate safeguards have been put in place to protect your personal information. This means that we will:

- ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission under Article 45 of the General Data Protection Regulation (GDPR);
- include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR); or
- (in the case of transfers from the EEA to the USA), ensure that the recipient of the personal information has certified with the US-EU Privacy Shield Framework, as permitted by Article 46.2 of the GPDR.

Your rights

You have the following rights regarding your information:

Rights	What does this mean?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Privacy Notice.
2. Right of access	You have the right to obtain access to your personal data (if we're processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you're aware and can check that we're using your personal data in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep it. This is not a general right to erasure; there are exceptions.
5. Right to restrict processing	You have rights to 'block' or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing	You have the right to object to certain types of processing in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This

Rights	What does this mean?
	includes your right to withdraw consent to us using your personal data for direct marketing.

For more information on your rights or if you would like to exercise any of your rights, you are welcome to get in touch using the details in the “*Contacting Us*” section below.

Contacting us

If you would like to contact us in relation to your rights or if you are unhappy with how we’ve handled your information, you may contact us by sending an email WholesaleDPS@sse.com

If you would like to contact our data protection officer, you may do so by contacting them at:

Email: dpo@legal.sse.com

Phone: 0345 070 7378

Postal: Data Protection Officer, c/o Executive Complaints Team, Grampian House, 200 Dunkeld Road, Perth PH1 3GH

If you’re not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner’s Office (ICO) using the following details:

Address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: www.ico.org.uk