

ScottishPower Foundation Privacy Notice

This privacy notice describes how ScottishPower Foundation processes your personal data in connection with its activities. ScottishPower Foundation is a registered Scottish charity (SC043862) and a company limited by guarantee (SC445116). Registered Office: 320 St. Vincent Street, Glasgow, G2 5AD.

In this Policy, references to "we", "us", and "our" (and other similar terms) means ScottishPower Foundation and "you" and "your" (and other similar terms) mean our grant applicants, grant recipients, charity beneficiaries, and event attendees and guests, however the information we process about you will vary depending on your engagement with us.

Introduction

To enable us to provide funding to registered charities, undertake project monitoring and to host the annual Awards ceremony to celebrate the achievements of these charities, the ScottishPower Foundation will collect and process individuals' personal data.

The personal data we collect may come directly from you through the completion of forms and reports submitted via email, online website submission, telephone call, or any other method of communication we may have with you; or in the case of beneficiaries, from the third-party charities with whom you may be affiliated.

ScottishPower Foundation may process your personal data as part of the following processes depending on the nature of your engagement;

Eligibility form & Application form

ScottishPower Foundation have two types of funding, the Annual Grants programme and Marine Biodiversity Fund. Charities can apply for either funding types by using our online eligibility and application forms. The purpose of the data processing is to enable the Foundation to select appropriate grant recipients.

The personal data collected for the designated charity primary contact will be your name and surname, email address, telephone, job positions and any other relevant information you provide.

Under data protection legislation, our lawful basis for processing personal data during this process is to enable preparation of a contractual relationship with grant recipients.

Funding Agreement

Each successful grant applicant will enter into a Funding Agreement with the ScottishPower Foundation. The purpose of this processing is to form the basis of the Funding Agreement which sets out the terms and conditions of the grant.

The personal data processed for the Funding Agreement is email address, name and surnames, and job position of the charity primary contact.

Under data protection legislation, our lawful basis for processing your personal data is to enable preparation of our contractual relationship with you as a grant recipient.

Grant Management

We require successful grant applicants to report their progress as a condition for funding. This reporting enables the Foundation to track the progress of the projects being funded according to the deliverables and milestones agreed upon the Funding Agreement. Information from the reports is shared with our funders and the Iberdrola group as well as through external communications when authorised by the charities. The purpose of this data processing is to measure project progress, and to communicate the overall impact of the grant on the organisation and beneficiaries.

The personal data collected for these purposes are as follows:

- If you are a charity primary contact for the ongoing management of a successful grant, we will process your name and surname, email address, telephone, job positions and any other relevant information you provide.
- If you are a charity beneficiary you may have provided feedback or a testimonial, and where you have consented to the charity to share this information with us, we may receive and process your name and age as part of the reporting.

Under data protection legislation, our lawful basis for processing personal data is:

- in connection to the contractual relationship with the charities
- and where applicable, consent for any testimonials. 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.

ScottishPower Foundation Events

The ScottishPower Foundation hosts events throughout the year including the ScottishPower Foundation Awards and an annual welcome meeting for new charities.

The charities we fund are invited to submit nominations to the ScottishPower Foundation Awards via an online nomination form. The nominations are then reviewed by a judging panel. The purpose of this processing is to select the winners of the ScottishPower Foundation Awards and to provide recognition for the charities.

Attendees to the Awards ceremony must register their details with us to enable us to track attendance and to aid communications in relation to the Awards. The purpose of this processing is to manage attendees, support event communication and planning. Attendees are also required to submit their passport numbers for security purposes and to gain entry to the Awards venue. Photography and videography are gathered at the event for Public Relations and Media purposes to promote the work of both the ScottishPower Foundation and the funded charities. We may also collect videos from the charities in support of their nominations to the Awards which we use as part of the social media campaign.

The personal data processed by ScottishPower Foundation for events include: Name, Email, image, passport number, voice, job positions, and some special category data may be

inferred for example health, or physical or mental condition either by affiliation or from the images.

Under data protection legislation, our lawful basis for processing personal data is:

- in the ScottishPower Foundation's legitimate interest in identifying attendees and award nominations, ensuring events are safe and secure to attend and to film and take photography at events.
- and where relevant, consent for images or videos submitted as a nominee for an award. You can withdraw consent at any time and your image/video will not be used in any future publications but please note it may continue to appear in existing publications which are already in circulation.

Public Relations and Social Media

We will share news with media outlets and on social media to communicate and promote the work that both the charities undertake because of the funding from ScottishPower Foundation, and the work of the Foundation itself. The personal data processed for this purpose includes name and surnames, email address, image, voice, and job positions.

This data could be used in print and digital media formats including print publications, websites, e-marketing, posters, banners, advertising, film and on social media. Images on websites including social media can be viewed throughout the world and not just in the United Kingdom and some countries may not apply the same Data Protection standards as the United Kingdom.

Under data protection legislation, our lawful basis for processing personal data is:

- in the ScottishPower Foundation's and the charities' legitimate interest to promote the work undertaken and the impact on beneficiaries
- and where relevant, consent for sharing photography, videography, and testimonials. You can withdraw consent at any time and your image/video will not be used in any future publications but please note it may continue to appear in existing publications which are already in circulation.

Security

ScottishPower Foundation have put 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. We have put in place strict confidentiality agreements (including data protection obligations) with our third-party service providers and processors.

Retention

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

Sharing

ScottishPower Foundation engages with data processors who are third parties i.e., consultants, contractors and suppliers. These third parties provide elements of our services

on our behalf. We have agreements in place with our third-party service providers that restrict the purposes for which they can process any personal data and we will only share personal data that is required to enable them to perform these services. Third party data processors include: ScottishPower UK, Iberdrola S.A, Hyphenate Ltd, Stripe PR and Communications Ltd and Salesforce Inc.

In some circumstances we are legally obliged to share information, for example under a court order or for law enforcement purposes, such as the prevention, investigation, and detection of crime.

Where 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 that we provide this data securely.

Transfers

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.

Your Rights

In accordance with Data Protection Legislation, you can exercise any of the following rights by contacting us at dataprotection_corporate@scottishpower.com

- 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 legal 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 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.

If you believe that your personal data is not being processed in line with this privacy notice you have the right to lodge a complaint with our Data Protection Officer, by contacting: dataprotection_corporate@scottishpower.com or Data Protection Officer, Scottish Power UK, 320 St Vincent Street, GLASGOW, G2 5AD.

If you are not satisfied with the response, 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 1113