

# SP Energy Networks Privacy Notice

This privacy notice describes how SP Energy Networks (which includes SP Distribution Plc (company number SC189125), SP Manweb plc (company number 02366937), and SP Transmission plc (company number SC189126)) processes your personal data in connection with its business activities. SP Energy Networks is part of the Scottish Power Limited Group (“ScottishPower”) and ScottishPower is part of the Iberdrola Group.

In this notice, references to "we", "us", and "our" (and other similar terms) means SP Energy Networks, "you", "your", and “users” (and other similar terms) mean our customers, contacts, stakeholders, and website visitors.

The SP Energy Networks Open Data Portal is an online platform that hosts SP Energy Network’s “open data”. The platform allows users to view, share and export different datasets relevant to their area of interest. Users can navigate through the platform by browsing through different dataset categories and/or using search criteria to identify the datasets that they are looking for. Where a dataset is unavailable, a user can request SP Energy Networks via the platform, for the dataset to be considered for potential future provision.

SP Energy Networks will process the following personal data:

- Identification and contact information i.e. Name, Address Email, and Telephone Number;
- Professional and/or Employment data i.e. training, titles, job positions, occupation, etc; and
- Any comments, feedback, or information you have provided.

Under Data Protection Legislation our lawful basis for processing your personal data is a regulatory legal obligation to engage with stakeholders in connection to our regulatory obligations on providing access to SP Energy Networks data and in the legitimate interest of SPEN to communicate and receive feedback for improvements.

SP Energy Networks engages with data processors who are third parties, i.e. Opendatasoft. These third parties provide elements of our services for us. 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 group, meaning our holding company and its subsidiaries.

In some circumstances we are legally obliged to share information, for example:

- Under a court order; or
- With regulatory authorities e.g. Ofgem in connection to our license conditions; or
- In emergency situations in connection to The Civil Contingencies Act 2004; or
- In order to enforce or apply our Terms of Use or Terms and Conditions of supply and other agreements, or to protect the rights, property, or safety of SP Energy Networks and our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

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.

We have in place appropriate technical and organizational security measures to protect your personal data against unauthorized 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.

SP Energy Networks has in place a Retention Policy so that personal data is not stored or processed longer than necessary. Personal data will be held in accordance with our Retention Policy and Privacy Policy, which can be found here <https://www.spenergynetworks.co.uk/pages/privacy.aspx>.

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 out with these areas, we will implement appropriate safeguards and security measures.

SP Energy Networks is 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, GDPR) which means that all companies in our Group have to comply with the same internal rules. You can download a copy of the Iberdrola BCRs [here](#).

In accordance with Data Protection Legislation, you can exercise any of the following rights by contacting us at [dp@spenergynetworks.co.uk](mailto:dp@spenergynetworks.co.uk)

- 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.

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\\_cporate@scottishpower.com](mailto:dataprotection_cporate@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.  
Tel: 0303 123 1113