

Electronic Vehicle Charging Facility Privacy Information Notice

This Privacy Information Notice (PIN) describes your rights under the General Data Protection Regulation (GDPR) and how we will use and protect your personal information.

We publish the current version of this PIN on our website at www.scottishpower.co.uk/legal/privacy-policy and we will update this from time to time. We will contact you (by email or letter) to notify you of these updates where:

- we are making substantial changes; or
- where we are doing something with your personal information, which you might not expect based on what we have told you in this PIN.

Otherwise, any updates to this PIN will be notified on our website and through our other communications with you.

This PIN is effective from 2 December 2019.

Who are we?

In order for you to use the electric vehicle charging facility (the "**Service**"), your information will be held by ScottishPower Energy Retail Ltd ("**ScottishPower**" or "**we**", "**us**", "**our**"), which is part of the ScottishPower Group.

Payments you make in connection with this Service are processed by our payment provider, Stripe Payments Europe Ltd.

Stripe, Inc. and its affiliates (collectively "**Stripe**") will hold your information for the purpose of safely conducting online payment transactions in relation to your use of the Service. Stripe's Global Privacy Policy (the "**Stripe Privacy Policy**") describes the types of Personal Data Stripe collects. You can access Stripe's Privacy Policy at stripe.com/gb/privacy.

Contact Information

If you have a question on this PIN or how we use your personal information, please email dataprotection@scottishpower.com or write to ScottishPower at ScottishPower Energy Retail, Data Protection, 320 St. Vincent Street, Glasgow, G2 5AD.

You have the right to lodge a complaint with our Data Protection Officer at: dataprotection_corporate@scottishpower.com if you believe that your personal information is not being processed in line with this PIN.

If you are not satisfied with the response, you have the right to lodge a complaint with the Information Commissioner's Office. Find out on their website how to report a concern at ico.org.uk/concerns.

If you have any questions or complaints in relation to Stripe, please contact: Stripe Payments Europe Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin.

To exercise your rights, the Data Protection Officer may be contacted via dpo@stripe.com.

What is Personal Information?

Personal Information includes information that can allow someone to identify you either directly, through your name or indirectly, through your address, card payment details or email address.

Stripe will also collect personal information when processing your payment. More details can be found via the Stripe Privacy Policy: stripe.com/gb/privacy.

Where we collect your Personal Information from

In order to provide you with the Service, we need to collect and use your personal information. ScottishPower collects your personal information from a number of different sources, including:

Data you give to us:

- When you talk to us on the phone
- In emails and letters
- When you use the Service and any supporting customer services, our websites, mobile device apps, or web chat services

Stripe may also collect information from you by various methods and more information on these methods can be found at: stripe.com/gb/privacy. We may also require data from Stripe in connection with your use of the Service.

Data from third parties:

- Law enforcement agencies
- Public information sources such as Companies House and social networks
- Market researchers
- Agents and contractors working on our behalf.

Who we share your Personal Information with

In order to provide the Service to you, we may share your personal information with other ScottishPower group companies and agents and contractors working on ScottishPower's behalf, including Fortum Charge and Drive, the provider of the Electronic Vehicle Charging Platform. This includes companies in the following categories:

- Customer Service
- Legal firms
- Customer research
- Technology and IT
- Digital and social media
- Data analytics
- Sales and marketing
- Payment processing
- Law enforcement agencies

Stripe may also share personal information with various third parties; details of whom can be found at: stripe.com/gb/privacy.

We never share you personal details with external companies for the purposes of their marketing save as authorised below.

Stripe may wish to carry out direct marketing activities using the personal information that it receives as part of providing the Payment Services. However, where required by applicable law, Stripe will obtain your consent prior to processing of your information for the purpose of internet-based advertising. For more information regarding how Stripe processes your personal information for direct marketing purposes, please see Stripe's Privacy Policy.

How we use your Personal Information

As well as this PIN, your privacy is protected by law. We are allowed to use personal information only if we have a proper reason to do so.

There are five main ways that we are permitted to use your personal information in the context of providing the Service:

- To fulfil our contractual commitments to you
- To meet our legal obligations
- When you consent to us using your personal information for a purpose
- When it is in our legitimate interests
- For the prevention or detection of crime.

The majority of these uses are mandatory – in other words, where we need to use your personal information to meet our contractual obligations to you to provide the Service or to meet our legal obligations. This also includes where you have provided us with your consent to use your personal information.

Here is a list of the ways that we may use your personal information for mandatory reasons:

Ways that ScottishPower use your personal information	Mandatory basis for using your personal information
To resolve complaints. To provide you with useful information. To study how you use our products to help develop our marketing activities	Fulfil our contractual commitments. To meet legal obligations. Where you consent.
To fulfil our obligations to you. To fulfil our obligations to our regulators. To run our business in an efficient manner.	Fulfil our contractual commitments. To meet legal obligations. Protect our vital interests. Where you consent.
To detect, investigate, report and seek to prevent financial crime.	Fulfil our contractual commitments. To meet legal obligations.
To market products and services to you.	Fulfil our contractual commitments.

	To meet legal obligations. Where you consent.
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Please note that Stripe may also use personal information for various reasons permitted by law. Please see stripe.com/gb/privacy for more details.

We may also use your personal information based on our legitimate interests. A legitimate interest is when we have a business or commercial reason to use your information (for instance to add value to our services or to carry out direct marketing). But even then, it must not unfairly go against what is right and best for you. To achieve this, we will ensure that the collection and processing of your personal information:

- is kept to a minimum with regards to the amount of personal information collected and the extent of any processing;
- will not be overly intrusive to you; and
- will be proportionate in order to meet our legitimate interests, as described below.

Our legitimate interests

- Analyse our interactions with you to improve our customer services for you.
- To seek your consent when we need it to contact you.
- To utilise existing methods and develop new techniques for identifying financial crime.
- To market products and services to you.
- Develop our products and our service to better meet customer needs.

Sending personal information outside of the EEA (by us)

Your personal information will occasionally be transferred to third party organisations, some of whom will be located outside of the UK or the EEA, as part of the services that we offer to you. For example, this will happen when any of the servers that store your personal information are located in a country outside of the UK or the EEA, or when one of our service providers is located in a country outside of the UK (such as Ireland) or the EEA, such as the USA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK data protection legislation.

The agreements that we have with these third party organisations are such that they will not use your personal information for any other purposes other than what we have agreed with them. We explicitly require that any third party organisations with whom we share personal information implement adequate levels of protection to safeguard your personal information, in accordance with data protection legislation. For example, we may put in place special contracts (which are approved by the European Commission and are known as "standard contractual clauses") with those services providers, or alternatively will ensure they have signed up to, and comply with, other approved mechanisms such as the EU-US Privacy Shield.

In order to effectively provide payment processing services, Stripe may send personal information internationally. Details of Stripe's policy can be found at stripe.com/gb/privacy.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot provide the Service.

To see how you can object to personal information being used by Stripe, please refer to their privacy policy at stripe.com/gb/privacy.

Marketing

We believe it is important for us to communicate with you to let you know of products, services and other important information.

Communication with you allows us to understand your needs, so we can offer you the right products and services to help and support your personal circumstances.

We will contact you, or business associated with you, with marketing messages if you have not opted out of direct marketing.

We may also have regulatory or contractual reasons for sending you communications.

How long we keep your Personal Information

We will keep your personal information for three years after you last use the service, this is to ensure we can discuss any questions you may have on historical transactions. Your personal details will then be removed.

Appropriate safeguards will be implemented to protect your personal information, including where technical limitations restrict our ability to remove your personal information from our systems.

Please see stripe.com/gb/privacy for Stripe's retention policy.

Obtaining your Personal Information

You have the right to obtain a copy of the personal information we hold about you:

By emailing us at

dataprotection@scottishpower.com

(subject heading: Subject Access Request – Your Name, your Account Number)

By writing to us at

Data Protection Team, Subject Access Request, ScottishPower Energy Retail Ltd, 320 St Vincent Street, Glasgow, G2 5AD.

Please note that if you are an existing ScottishPower customer, we will not combine your use of the Service with any other ScottishPower accounts that you have. Therefore, if you do wish to obtain that personal information also, please make a separate request quoting your account number.

You also have the right to obtain personal data you have provided to us in a format that can be easily re-used and to ask us to pass it on in this format to other organisations if this is technically feasible.

If you are requesting personal information from Stripe directly, please refer to Parts 5 and 12 of their privacy policy at: stripe.com/gb/privacy.

Correcting your Personal Information

You have the right to question any personal information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

By emailing us as

dataprotection@scottishpower.com

(subject heading: Right to Rectification – Your Name, your Account Number)

By writing to us at

Data Protection Team, Right to Rectification, ScottishPower Energy Retail Ltd, 320 St Vincent Street, Glasgow, G2 5AD.

If you are seeking rectification from Stripe directly, please refer to Parts 5 and 12 of the Stripe Privacy Policy at: stripe.com/gb/privacy.

Controlling your Personal Information

Data Protection law provides you with a number of rights in relation to how we can use your personal information.

- Right to erasure (Right to be forgotten) - you have the right to request the deletion or removal of your personal information where there is no compelling reason for its continued processing by us.
- Right to restrict processing – you have the right to request that we block or suppress processing of your personal information.
- Right to object – you have the right to object to the processing of your personal information by us where the processing is based on our legitimate interests, is processed for direct marketing purposes (including profiling) or for the purposes of statistics. If you wish to object to our use of legitimate interest for marketing please see section '**Withdrawing your consent**', for contact details.

There may be legal or other reasons why we need to use your personal information in the way that we do, but please contact us if you think otherwise.

By emailing us at

dataprotection@scottishpower.com

(subject heading: Data Subject Rights – Your Name, your Account Number)

By writing to us at

Data Protection Team, Data Subject Rights, ScottishPower Energy Retail Ltd, 320 St Vincent Street, Glasgow, G2 5AD.

Further information on your personal information rights is available on the Information Commissioner's website at ico.org.uk.

Withdrawing your consent

Where we process personal information based on your consent, you have the right to withdraw this consent at any time. If you withdraw your consent, and we rely on it to use your personal information, we may not be able to provide certain products or services to you. Please contact us if you want to do this.

By emailing us at

contactus@scottishpower.com

By writing to us at

Customer Services, ScottishPower Energy Retail Ltd, 320 St Vincent Street, Glasgow, G2 5AD