




# **SSE Shareholder Privacy Notice**



Applies to: <b>SSE Group</b>	<b>SSE Shareholder Privacy Notice</b>	   For a better world of energy
Classification: Internal	Uncontrolled if printed	<b>REF-COR-DP-024</b>

<b>The Author/Owner of this document is:</b>	<b>This document has been approved for issue by:</b>	<b>Date of Issue:</b>	<b>Review Date:</b>
Andrew Greer, Data Protection Solicitor	Lisa Deverick, Group Data Protection Officer	December 2024	December 2026

## About us

SSE plc (“we”, “us” or “our”) is committed to ensuring your privacy is protected. The Data Controller is SSE plc (Company number: SC117119) having its registered address and trading address at Inveralmond House, 200 Dunkeld Road, Perth, Perthshire, PH1 3AQ.

## Who this privacy notice applies to

This Privacy Notice explains how we collect, share and use personal information about you before, during and after you have a shareholding with us, and how you can exercise your privacy rights. We have appointed Computershare Investor Services plc as “Registrar” to manage our register of shareholders. Their role includes keeping an up-to-date record of shares held by shareholders, administration of shareholder payments, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Computershare processes personal information about you as a shareholder on our behalf. For more information on how Computershare use your data, please refer to the relevant privacy notice published on their website [here](#).

## Who are we?

We are a leading generator of renewable electricity and one of the largest electricity network companies in the UK. We develop, own and operate low carbon infrastructure to support the zero-carbon transition. This includes onshore and offshore wind, hydro power, electricity transmission and distribution grids, and efficient gas-fired generation, alongside providing energy products and services for businesses, and we have interests across Great Britain and Northern Ireland, Republic of Ireland, Japan, Spain, Portugal, Denmark and Poland.

## The type of personal information we collect


We collect the following personal information about you:

- Title;
- Name;
- Address;
- Email Address;
- Telephone Number;
- ID;
- Date of birth;
- Details of votes cast;
- National Insurance Number;
- Shareholder Reference Number;
- Information on your past and present shareholdings;
- Bank details;
- Your IP address.

## Why we use your personal information?

We need to know this information in order to maintain a register of shareholders. This includes:

- ensuring the register is kept up to date (\*, \*\* and \*\*\*);
- managing your shareholding interest, including processing your shareholder rights and our obligations to you as a shareholder, in accordance with our Articles of Association and applicable laws (\* and \*\*\*);

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- responding to enquiries and/or complaints you raise with us (\*\*);
- fulfilling our legal and regulatory obligations, including to our regulators, tax officials or otherwise (\*\*);
- operating and improving our business and to enable us to enforce or defend our legal rights, including by bringing or defending legal claims that may be made by or against SSE plc in relation to your shareholdings or interests in shares (\*\*);
- contacting you with shareholder information and related communications including important information about dividend distributions, shareholder resolutions, reports and meetings, including details of our Annual General Meeting and to keep our shareholders informed about our business, strategy and financial results (\*, \*\* and \*\*).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. Using the key set out in the table below, we have also indicated above (and elsewhere throughout this Privacy Notice as applicable) any relevant legal bases that relate to the processing activity in question. Please also see further details under “Lawful basis for processing”.

#### KEY LEGAL BASIS

- \* To perform a contract with you
- \*\* The processing is in our legitimate interests
- \*\*\* We are under a legal obligation

### How we get the personal information

Most of the personal information we process is provided to us directly by you or through your agent or stockbroker, for example on shareholder application and registration forms or when you use our website.

We may also receive personal information about you directly from Computershare.

### Who we share your personal information with


We may share your information with:

- Our appointed Registrar, Computershare, who manages the shareholder register, including updating shareholder details, keeping records of share certificates, share transfers and being responsible for the payment of share dividends to shareholders.
- Any competent law enforcement body, regulatory agency, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business.
- Any third party, further to a valid statutory request to inspect or receive a copy of SSE plc’s register of members (or part thereof) for a proper purpose under Section 116 of the Companies Act 2006.
- Any third party to whom we propose to transfer our obligations and rights in relation to the administration of our share register.

### Lawful basis 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 (as indicated by \*);
- where it is necessary for legitimate interests pursued by us and your interests and fundamental rights do not override those interests (as indicated by \*\*).
- to comply with our legal obligations (as indicated by \*\*);

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## How we store your personal information

We keep your personal information for the following retention periods:

- Transfers - 6 years from date of transfer
- Cancelled certificates - 1 year from cancellation
- Changes of address - 2 years from change of address being actioned by Registrar
- Dividend Authorities/Mandates - 3 years from receipt
- Indemnities – Indefinitely
- Paid Dividend Warrants/Cheques - 6 years from issuance/receipt
- Grants of representation - 6 years from issuance/receipt
- Court Orders - 6 years from end of proceedings
- Renounceable Certificates / Allotment Letters
  - o a) Registrations and original renunciations - 6 years from renouncement
  - o b) Exchanged for Certificates - 1 year from exchange
- Forms of Acceptance/Transfer Excess Forms - 6 years from acceptance/transfer
- Paid Cheques (Sale of Rights, Redemption Cheques, Fractions, etc) - 6 years from receipt
- Routine Correspondence - 3 years from receipt

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 above, 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 destroy your information once this is no longer needed.

## Cookies

We may collect your IP address automatically when you visit our website. Some of this may be collected using cookies and similar tracking technology which we may create and access cookies on your PC. Cookies are small text files stored in your web browser, which can identify you when you visit our website and in our cookies policy. For more information see our [cookies policy](#).


This also applies when you visit Computershare’s website directly. For more information, please see their [cookies policy](#).

## International Data Transfers

Your personal data may be transferred to or processed in a country which is outside your resident country (this includes outside of the United Kingdom and European Economic Area (“EEA”)). This may include transfers to other companies within the SSE group, and to third parties.

We take organisational, contractual, and legal measures to ensure that adequate levels of protection have been implemented to safeguard your personal data such as:

- o Where the country has been granted an adequacy decision by the European Commission and/or the Information Commissioner in the UK. This means that the destination country provides an adequate level of protection which is equivalent to the UK, and the EEA; or
- o Put in place a contract with the third party receiving the personal data, which incorporates the Standard Contractual Clauses (“SCCs”) which has been issued by the European Commission (in relation to transfers of European residents’ personal data) and the UK addendum to the SCCs which has been issued by the ICO (in relation to transfers of UK residents’ personal data), that means the third party who receives the personal data must protect it to the same standards set out in the GDPR; or

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- Where an appropriate derogation as set out in Article 49 of the GDPR applies; or
- Where the US/EU data protection framework arrangements apply.

## Your rights

You have the following rights regarding your information:

<b>Rights</b>	<b>What does this mean?</b>
1. Right to be informed (* , ** and ***)	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we're providing you with the information in this Privacy Notice.
2. Right of access (* , ** and ***)	You have the right to obtain access to your personal information (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 information in accordance with data protection law.
3. Right to rectification (* and **)	You are entitled to have your personal information corrected if it's inaccurate or incomplete.
4. Right to erasure (* and **)	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 information 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 information, but may not use it further.
6. Right to data portability (* )	You have the right to obtain and reuse your personal information 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 information 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 information 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 information, 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 information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information 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 by contacting us at [ir@sse.com](mailto:ir@sse.com).

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## Contacting us

The SSE Group Data Protection Officer can be contacted at:

### Data Protection Officer

SSE plc

No. 1 Forbury Place

43 Forbury Road

Reading

RG1 3JH

Email: [GroupDPO@sse.com](mailto:GroupDPO@sse.com)

You can also complain to the Regulator if you are unhappy with how we have used your data:

### Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone number: 0303 123 1113

Website: [Make a complaint | ICO](#)