

SSE EMPLOYEE AND CONTRACTOR PRIVACY NOTICE

REF-COR-HR-100

Applies to: HR	SSE Employee and Contractor Privacy Notice	Document Ref Number
Classification: Public	Uncontrolled if printed	REF-COR-HR-100

The Author/Owner of this document is:	This document has been approved for issue by:	Date of Issue:	Review Date:
HR Data Protection Specialist	Group Data Protection Officer	March 2024	March 2025 and thereafter annually

Who this privacy notice applies to

This Privacy Notice covers the use of personal data relating to employees, agents, consultants, contractors (including employees of contractors), temporary workers, prior employees, employees' family members and next of kin, by the following SSE group companies:

Legal Entity	Company No.	Address
Keadby Generation Limited	02729513	Keadby Power Station Trentside, Keadby, Scunthorpe, United Kingdom, DN17 3EF
Optimal Power Networks Ltd	11024024	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
Southern Electric Power Distribution PLC	04094290	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
Scottish Hydro Electric Power Distribution PLC	SC213460	Inveralmond House, 200 Dunkeld Road, Perth PH1 3AQ
Scottish Hydro Electric Transmission PLC	SC213461	Inveralmond House, 200 Dunkeld Road, Perth PH1 3AQ
Slough Heat & Power Ltd	00174142	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Airtricity Gas Supply (NI) Ltd	NI032810	Millennium House, 25 Great Victoria Street, Belfast, Northern Ireland, BT2 7AQ
SSE Energy Supply Ltd	03757502	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Generation Ltd	02310571	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Hornsea Ltd	04467860	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Medway Operations Ltd	02647585	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE E&P UK Ltd	SC375371	Inveralmond House, 200 Dunkeld Road, Perth PH1 3AQ
SSE Energy Markets Ltd	09442646	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Heat Networks Ltd	SC303682	Inveralmond House, 200 Dunkeld Road, Perth, Scotland, PH1 3AQ
SSE Production Services Ltd	02499702	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Services plc	02366879	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Utility Solutions Ltd	06894120	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE PG (Operations) Limited	02764438	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Renewables Holdings (UK) Ltd	NI043239	2nd Floor, 83-85 Great Victoria Street, Belfast BT2 7AF
SSE Renewables Services (UK) Ltd	NI043294	Millennium House, 25 Great Victoria Street, Belfast, Northern Ireland, BT2 7AQ
SSE Thermal Energy Operations Ltd	12697902	1 Forbury Place, 43 Forbury Road, Reading, Berkshire RG1 3JH
SSE Thermal Generation (Scotland) Ltd	SC664055	Inveralmond House, 200 Dunkeld Road, Perth, Scotland, PH1 3AQ

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TESGL	08462158	Ocean Road, Capstan Road, Atlantic Street, Cheshire, WA14 5HH
SSE Airtricity Energy Supply (NI) Ltd	NI041956	Millennium House, 25 Great Victoria Street, Belfast, Northern Ireland, BT2 7AQ
SSE Renewables Services Ltd	331742	Red Oak South, South County Business Park, Leopardstown, Dublin 18, Ireland

SSE Services plc and the company which enters into a contract of employment or a contract for service with you from the list above will be Joint Controllers of the information you provide to us.

The type of personal data we collect

We process and store personal data about you. This will include things such as:

- Personal identification information (e.g., name, title, address, email address, email, telephone number etc.);
- Date of birth;
- Gender;
- Marital status and dependants;
- Next of kin and emergency contact information;
- National Insurance number (PPS Number in Republic of Ireland);
- Geographical data, for example your location at a given time through the use of Blackbox's in our commercial vehicles or, for lone workers, through the GeoSafe App when present on an SSE Windfarm;
- Contracts and administrative documents (e.g., contract, change of hours forms etc);
- Bank account details, payroll records and tax status information;
- Information about your job role such as: office location, ID numbers assigned to you for internal use, job role, hierarchy in the organisation;
- Qualifications and training information;
- Performance (This may include disciplinary records, grievances etc);
- Recruitment information (e.g., right to work documentation, passports, references, vetting & verification output and other information included in a CV or cover letters process);
- Absence and health data (this may include reasons for absences, health screening results, and drug and alcohol test results);
- Swipe card records and other records for time keeping and access control purposes;
- Photographs, images, voice recordings, video footage (including but not limited to those obtained via CCTV, dashcam, and body worn cameras) of you for the purposes of security, health and safety, brand and marketing campaigns, and/or communications;
- Equality, inclusion, and diversity information;
- Driving details including driving licence, car registration, named drivers if used for company purposes;
- Trade Union membership data; and
- Criminal Offence data (convictions, fines, driving offences, details of incidents, records etc. Any investigation that is carried out in relation to an allegation or suspicion will be treated as criminal data) – see section below for more details.

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Why we use your personal data

We use the information given to us so that managers, the finance team, IT Services, and human resources can perform their everyday functions and administer your contracts with us such as:

- Recruitment including vetting and verification of right to work, references and criminality checks;
- Equality, inclusion and diversity monitoring and reporting;
- Production and maintenance of your contract of employment or contract for services;
- Administering pay and benefits and making adjustments, including end of employment processes;
- Teams Recordings and Transcriptions providing there is a legitimate business purpose.
- Maintaining key structures such as hierarchies and financial systems;
- Maintaining an efficient employee benefits program;
- Holiday, sick leave and any other absences (e.g., family leave, sabbatical or otherwise);
- Health and safety regulation, or security measures e.g., understanding who is at work and on site;
- Health and safety obligations as your employer (e.g., collection of health data for the purpose of drug and alcohol testing);
- Performance management and appraisal, including development via training;
- Administration of training and maintaining training records;
- Management forecasting;
- Provision of a business travel service;
- Statutory or business certification for specific roles;
- Workforce management; organisation and work distribution;
- Distribution or delivery of IT equipment (this can include mobile phones, work laptops etc.);
- Running, growing and developing our business which may involve the use of Artificial Intelligence (AI) Technologies;
- Prevention and detection of crime (e.g., where SSE receives reports of offences through the ordinary course of business, whistleblowing, or if we receive a request for personal data from the police as part of a criminal investigation, where justified);
- Surveys and feedback forms e.g., occasionally we may carry out surveys to capture views and help during key business discussions and decision making;
- Disciplinary and grievance matters raised by or involving you;
- Group reporting to monitor performance against SSE Policies and legal/regulatory obligations;
- Analysing effectiveness of promotional campaigns and occupational health advertising;
- Protection of company property and that of third parties; and
- Legal claims.
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Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

Monitoring

We may monitor communications and correspondence in connection with your use of SSE's IT resources, including telephone and computer systems, and any personal use of them, by automated software or otherwise.

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Any monitoring we undertake, is only carried out to the extent permitted or as required by applicable laws and which we have determined is reasonable, proportionate and is done so to ensure confidentiality, integrity, availability and resilience of SSE systems and data.

Types of monitoring include:

CCTV, dashcam in vehicles, body worn cameras and other forms of video monitoring

CCTV cameras, dashcam in vehicles, and body worn cameras are widely used at SSE and may capture your images. Video footage may be used in the prevention, detection and prosecution of crime, to comply with legal obligations, to ensure the health and safety of staff and visitors, or in relation to actual or prospective legal proceedings if deemed appropriate.

IT Monitoring

including cyber security surveillance, activities to support data loss prevention, monitoring of suspicious activity and unauthorised system use.

E-Discovery

E-discovery tools including certain algorithms will be used to search, sort and collate information for the purposes of data subject access requests, legal claims and legal rights, and regulatory obligations.

Geographical Tracking

SSE's commercial vehicles have black boxes installed which allow the location of the vehicle to be tracked at all times, this is to promote the safety of our employees and contractors, prevent insurance fraud and help our employees and contractors maintain a good driving performance.

When present on an SSE Windfarm, your location will be monitored for any anomalies using the GeoSafe App. Geosafe monitors the location of individuals whilst on a windfarm for health & safety purposes and to allow for their exact GPS coordinates to be shared with the emergency response team in the event of a red alert scenario. A proof of life prompt is an automatically generated notification sent to the user's mobile device that requires the user to respond by acknowledging the prompt. To minimise privacy intrusion, the proof of life prompt will only be used in the case of lone workers.

Direct Marketing

Unless you have asked us not to, we may in the future post or phone you 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 collected your information, can offer. We will not send you direct marketing via email or SMS unless you have given consent to do so.

We may use third parties to send these communications.

How we get the personal data

Most of the personal data we process is provided to us directly by you at the beginning of your contract of employment or contract for services and during the term of your contract.

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We also receive personal data indirectly, for example from the following sources in the following scenarios:

- Employment references;
- Occupational health reports;
- Drug and alcohol testing;
- Vetting and verification criminality checks; and • SSE monitoring systems.

Who we share your personal data with

We may share this information with others from time to time, including:

- Our professional advisers, e.g., our accounting and legal advisers where they require that information in order to provide advice to us in relation to our services;
- Regulatory authorities we may be subject to for the purpose of demonstrating compliance with applicable law and regulations;
- “Competent Authorities” e.g., This may include but is not limited to Police, Government Authorities and/or the Health and Safety Executive (HSE) as part of an investigation being carried out;
- Our group’s service providers such as: IT hardware and software suppliers, our advisers, benefits providers, healthcare companies which carry out occupational health assessments and testing, training and development providers, lease companies for vehicles, travel providers, as well as those who provide and support our management and data storage systems);
- In the context of the possible sale or restructuring of the business;
- Our group companies for the purposes of management information, operational control and management of health and safety at work; and
- Third parties who carry out our credit checks and criminal records checks and provide us with the results.

Lawful basis for processing

Under Data Protection legislation, the lawful bases we rely on to process this information are:

- To fulfil **contractual obligations** and rights in relation to your contract with us.
- Where we have a **legal or regulatory obligation**.
- To protect the **vital interests** of our data subjects or of another person.
- Where it is necessary for **legitimate interests** pursued by us or a third party, and your interests and fundamental rights do not override those interests; and
- In some limited circumstances, with your **consent**.

Special Category Data

We process ‘special category’ data for some purposes. Special category data includes:

- Data revealing Racial or ethnic origin;
- Data revealing Political opinions;
- Data revealing Religious or philosophical beliefs;

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- Data revealing Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning health; and
- Data concerning a natural person's sex life or sexual orientation.

We process it under the following legal bases:

- Where we need to carry out our **legal obligations** or exercise legal rights in connection with your employment or your engagement with us
- Where it is needed in the **public interest**, such as for equal opportunities monitoring (or in relation to our occupational pension scheme)
- Where it is necessary to **protect** you or another person from harm
- In limited circumstances, with your explicit written **consent**.

Less commonly, we may process special category information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Criminal Offence Data

We may hold information about criminal offences, this is not limited to convictions and fines, but also alleged allegations, and self-declarations pending investigation. We will only collect it if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate, we will collect this type of information as part of the recruitment process, or we may be notified of such information directly by you in the course of you working for us.

We will use information about criminal convictions and offences in the following ways:

- Pre-employment checks (not applicable to employees in ROI);
- Annual declarations by an employee in line with contractual obligations;
- Pre-employment declaration form (ROI only);
- Investigation of alleged offences and whistleblowing

We are allowed to use your personal data in this way to carry out our obligations set out by OFGEM's Licence Conditions, and by law. We have in place an appropriate policy and safeguards which we are required by law when processing such data.

If an employee is believed to have committed a criminal offence an internal investigation will be carried out and will be treated as criminal data regardless of the offence being alleged and unproven at that time.

We will only process this data where we have a legal basis to do so, e.g., where we have a basis in employment law for doing so, or in the detection or prevention of illegal acts.

International data transfers

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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:

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

If you fail to provide personal data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers)

How we store your personal data

Your information is securely stored. We will only keep it for as long as necessary in order to achieve our processing purposes. We will then dispose of it by a secure method.

When deciding our retention periods, we take into account any continued need to process the data, and any legal obligations relating to tax, health and safety, employment and potential or actual disputes or investigations relating to those matters.

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 comprehensive information about how we use your personal data.
2. Right of access	You have the right to ask us for copies of your personal data.
3. Right to rectification	You have the right to ask us to have your personal data corrected if it’s inaccurate or incomplete.
4. Right to erasure	You have the right to ask us to erase your personal data in certain circumstances.

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5. Right to restrict processing	You have the right to ask us to restrict the processing of your personal data in certain circumstances.
6. Right to data portability	You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
7. Right to object to processing	You have the right to object to the processing of your personal data in certain circumstances. For example, opting out of direct marketing (see “withdrawing consent”)
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 includes your right to withdraw consent to us using your personal data for direct marketing.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Requests can be made to the HR Data Protection Specialist (see ‘Contacting us’).

Contacting us

If you would like to contact us in relation to your rights; or have any concerns about our use of your personal data, you can make a complaint to us at:

HR Data Protection Specialist
 HR Service Centre
 Inveralmond House
 200 Dunkeld Road
 Perth
 PH1 3AQ
 Email: HRGDPR@sse.com

The SSE Group Data Protection Officer can be contacted at:

Data Protection Officer
 No. 1 Forbury Place
 43 Forbury Road,
 Reading
 RG1 3JH
 Email: 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 (UK Regulator)

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Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number: 0303 123 1113
Website: www.ico.org.uk

Data Protection Commissioner (ROI Regulator)

21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

Helpline Number: 01 7650100 / 1800437 737
Website: www.dataprotection.ie

This Privacy Notice was last reviewed in March 2024.