

SSE Media Privacy Notice

Last updated: August 2025

At SSE ("we", "us", "our"), we are committed to protecting your privacy and complying with the UK General Data Protection Regulation ("UK GDPR") and the EU General Data Protection Regulation ("EU GDPR"). This privacy notice explains how we collect, use, and protect personal data when capturing photographs, videos, or audio recordings of you (or your child) ("**Media**"), and any related personal data such as names or contact details.

It is important that you read this privacy notice together with any other privacy notice we may provide you. This privacy notice supplements the other notices and is not intended to override them.

Who Are We?

We are SSE PLC (SC117119) having its registered address and trading address at Inveralmond House, 200 Dunkeld Road, Perth, Perthshire, PH1 3AQ. For the purposes of the UK GDPR and EU GDPR, we are the data controller.

What Personal Data Do We Collect?

We may collect the following types of personal data through Media:

- Your (or your child's) image, voice, or likeness in photos, videos, or audio.
- Contextual details, such as the date, time, and location of the recording.
- Identifying information, such as your (or your child's) name, age, and contact details (e.g. when consent is required or provided).

In some cases, Media may capture special category data, including:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health-related information
- Sexual orientation or gender identity
- Political opinions
- Trade union membership

This data may be inferred from visual cues (e.g. clothing, symbols, or participation in events). We only process such data where legally permitted and take steps to minimise its collection and use.

Why Do We Process Media and Related Personal Data?

We process Media and related personal data for the following purposes:

- **Documenting Activities:** To record events, projects, community initiatives, and workplace activities.
- **Marketing and Communications:** To promote SSE's work, values, and community engagement via our website, social media, printed materials, and external publications.
- **Internal Use:** For staff training, internal communications, and team building.

- **Legal and Regulatory Compliance:** To meet legal, regulatory, or reporting obligations.
- **Relationship Management:** To store names and contact details for communication and consent tracking.

We may also process special category data where necessary to:

- Promote diversity, inclusion, and community representation
- Fulfil legal or regulatory obligations
- Support public interest initiatives

What Lawful Bases Do We Rely On?

We process Media and related personal data under the following lawful bases, as permitted by the UK GDPR and EU GDPR:

Lawful bases	When we may rely on it
Legitimate Interests	<p>We may process Media where it is necessary for our legitimate business interests, including:</p> <ul style="list-style-type: none"> • Promoting SSE's work and community engagement • Maintaining public engagement and transparency • Ensuring workplace and site security • Preventing and investigating fraud or misconduct • Supporting operational efficiency and service improvement • Monitoring health and safety across our sites and operations • Keeping a record of your (or your child's) name and contact details to manage consent or follow up on Media use
Consent	<p>We will seek your consent where required, particularly for individual headshots or identifiable video footage used in:</p> <ul style="list-style-type: none"> • Marketing, communications, or internal engagement • Employee engagement, training, and educational materials • Customer research, surveys, and testimonials • Community and stakeholder engagement activities. <p>Consent is also typically required when processing children's data.</p>
Contract	<p>We may process Media where it is necessary to fulfil a contract, such as:</p> <ul style="list-style-type: none"> • Agreements with paid models or actors • Employee contracts involving internal communications or promotional content • Customer or supplier agreements that include Media use • Bespoke energy solutions involving customer case studies
Legal Obligation	<p>We may process Media or related personal data to comply with legal requirements, including:</p> <ul style="list-style-type: none"> • Health and safety compliance and incident reporting • Regulatory inspections and audits • Fraud prevention and investigations

	<ul style="list-style-type: none"> • Legal disputes and compliance with court orders or statutory duties
Public Task	<p>We may process Media where it is necessary to carry out a task in the public interest or in the exercise of official authority, such as:</p> <ul style="list-style-type: none"> • Participation in government-backed energy programmes • Public awareness campaigns on energy efficiency or sustainability
Archiving in the Public Interest	<p>We may retain Media that is considered historically or culturally significant, for example:</p> <ul style="list-style-type: none"> • Documenting major infrastructure projects or community initiatives • Preserving content in SSE's heritage archive for long-term reference <p>In these instances, our heritage team would retain a copy in their archives.</p>

In rare cases, when we process special category data, we rely on consent, unless the processing is necessary for:

- **Employment purposes** – e.g. ensuring employee health and safety on-site.
- **Legal claims** – e.g. using footage in legal or insurance matters.
- **Substantial public interest** – e.g. supporting public safety or promoting inclusion.
- **Research or statistics** – e.g. energy research purposes where health conditions may be relevant for statistical or historical studies.
- **Archiving in the public interest** – e.g. preserving records of major projects or initiatives.

Who Do We Share It With?

We may share Media and related data with:

- SSE group companies and internal teams
- Third-party service providers (e.g. media agencies, photographers)
- Public platforms (e.g. social media, websites, press)
- Regulators and law enforcement (e.g. UK Government, police)

How Long Do We Keep It?

We retain Media and related data only as long as necessary for the purposes outlined above. We regularly review content to ensure it remains relevant. When no longer needed, it is securely deleted or archived in line with our data handling practices.

How Do We Keep Your Data Safe?

We apply appropriate technical and organisational measures to protect your data, including secure storage systems and restricted access to Media content.

Your Rights

Under data protection law, you have rights in relation to your personal data. These include the right to:

1. **Be informed** – Receive clear and transparent information about how we use your personal data (as provided in this notice).
2. **Access your data** – Request a copy of the personal data we hold about you.
3. **Rectify inaccuracies** – Ask us to correct or complete any inaccurate or incomplete personal data.
4. **Request erasure** – Ask us to delete your personal data in certain circumstances (also known as the "right to be forgotten").
5. **Restrict processing** – Request that we limit how we use your data in specific situations.
6. **Data portability** – Obtain and reuse your personal data in a structured, commonly used, and machine-readable format, where applicable.
7. **Object to processing** – Object to the processing of your data where it is based on our legitimate interests or is being used for public interest grounds and in some circumstances, where the processing is for research, or statistical purposes.
8. **Withdraw consent** – Withdraw your consent at any time where we rely on it to process your data. This will not affect the lawfulness of any processing carried out before your consent was withdrawn.

For more information about your rights, please refer to [Privacy notice | SSE](#).

To exercise any of your rights, please contact us at: PrivacyCentre@sse.com.

Want to Change Your Mind?

You may withdraw your consent at any time by contacting PrivacyCentre@sse.com. We will stop using your (or your child's) image in future materials and make reasonable efforts to remove it from digital platforms.

Please note:

- Withdrawal does not affect prior lawful use
- We cannot recall already published materials, or guarantee removal from third-party platforms
- Some content may be retained for legal or archival reasons

Intentional Data Transfers

Your 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 as described above.

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 that applied in the UK, and in the EEA;
- Put in place a contract with third party receiving the personal data, which incorporates the Standard Contractual Clauses which have been approved by both

European Commission for transfers of European residents' personal data outside of Europe. These clauses have also been issued by the ICO (in relation to transfers of UK residents' personal data), that means that third party who receives this information must apply standards equivalent to those set out in GDPR;

- Where an appropriate derogation as set out in Article 49 of GDPR applies; or
- Where either EU-US Data Privacy Framework and/or UK Extension to EU-US Data Privacy Framework arrangements apply.

Need Help or Have Questions?

If you have any questions or concerns, please contact:

- Our Data Protection Team: PrivacyCentre@sse.com
- SSE Group Data Protection Officer: GroupDPO@sse.com

You also have the right to lodge a complaint with the UK Information Commissioner's Office at www.ico.org.uk, or with the relevant EU supervisory authority.

For more general information, please see [Privacy notice | SSE](#).