

# Social Enterprise Direct

## Privacy Notice for Customers

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### Introduction

Social Enterprise Direct (ICO Registration Z3595850) (“SED”) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

When you make an application to the ScottishPower Hardship Fund or Pre-Payment Voucher Fund, Social Enterprise Direct is your Data Processor. Your Data Controller for these services is Scottish Power Ltd. Further information regarding ScottishPower’s use of your data is available at <https://www.scottishpower.co.uk/legal/privacy-policy>.

Our personal information handling policies and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC), the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### What information do we collect?

We collect and process personal data about you when you interact with our advisers or automated services. The personal data we process includes:

- Your name;
- Your phone number;
- Your email address;
- Your home address;
- ScottishPower account number;
- ScottishPower account details;
- Information related to the browser or device you use to access our website;
- Recordings of calls you make to our advisers;
- And/or any other information you provide.

### How do we use this information and what is the legal basis for this use?

We process the data listed above for the following purposes:

- In accordance with our legitimate interests, to assist you in your application, to provide relevant and applicable guidance, advice and information and to discern your eligibility for our Funds. Where this information is not provided, the service we are able to give you will be limited or we may be unable to proceed;
- In accordance with our legitimate interests, to forward you relevant information or advice via email or text, throughout your application;
- To comply with applicable law and legislation;

- In accordance with our legitimate interests in protecting SED's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- To monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- We may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests; and
- In circumstances where you contact us by telephone, calls on our helplines are recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- To provide ScottishPower to the above information.

### With whom and where will we share your personal data?

- Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.
- Personal data will be shared with ScottishPower and/or their representatives for the purposes of processing your application, checking account details, validating meter readings, processing payments to your account and fraud prevention.

### How long do we keep your personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

As a responsible company we have an obligation to protect customers' identities by ensuring that sensitive data is not stored on our systems for longer than necessary. As such we are committed to an ongoing data deletion policy which categorises customer information into the following timescales:

#### 15 Months

- Enquiry Comments (including copy/pasted emails from Third Parties) [ENQ]
- Evidence Attachments [ENQ]

#### 3 Years

- Customer Name [ENQ]
- Contact for Communication [ENQ]
- Customer Phone [ENQ]
- Customer Mobile [ENQ]
- Customer Email [ENQ]

- Best time to contact Account Holder [ENQ]
- Where Did You Hear About SP Fund [ENQ]
- Money Debt Advice Last 3 Months [ENQ]
- Debt Advice Agency [ENQ]
- Debt Advice Agency Other [ENQ]
- Debt Advice Reference [ENQ]
- Household Income Less Than Threshold [ENQ]
- Benefits Received [ENQ]
- Disabled Child Premium [ENQ]
- Pensioner Premium [ENQ]
- Energy Spend >10% income [ENQ]
- Child Free School Meals [ENQ]
- Child in FT education [ENQ]
- Children Under 5 [ENQ]
- Child Tax Credit [ENQ]
- Income Related Benefit [ENQ]
- Employment Support Allowance [ENQ]
- Disability Living Allowance [ENQ]
- NHS Prescription Exemption [ENQ]
- Customer Age [ENQ]
- Circumstances – Problem Explanation [ENQ]
- Circumstances – Relevant Circumstances [ENQ]
- Circumstances – Award Benefits [ENQ]
- Circumstances – Reason for Reapplying [ENQ]
- Confirm Billed to Actual Reads [ENQ]
- Live debt bal (sic) after billing [ENQ]
- Final debt bal (sic) after billing [ENQ]
- Total Debt [ENQ]
- SP Total Debt [ENQ]
- Customer Owner [CUST]
- Customer Record Type [CUST]
- Name [CUST]
- Phone [CUST]
- Account Name [CUST]
- Mobile [CUST]
- Job Title [CUST]
- Email [CUST]
- Relationship to Account Holder [CUST]
- Birthdate [CUST]
- Mailing Address [CUST]
- Other Address [CUST]
- Debt Mailing Street [CUST]
- Debt Mailing City [CUST]
- Debt Mailing County [CUST]
- Debt Mailing Country [CUST]
- Debt Mailing Postcode [CUST]

- Children 17-Under [CUST]
- Adults 18-65 [CUST]
- Adults 66-Over [CUST]

#### 6 Years

- Enquiry Number [ENQ]
- Date Application Completed [ENQ]
- Meter Type [ENQ]
- Services [ENQ]
- Account Reference [ENQ]
- Last Bill Value [ENQ]
- Main or Day Read [ENQ]
- Night Read [ENQ]
- Control Read [ENQ]
- Value applied to account [ENQ]

*KEY: [ENQ]=Enquiry Record, [CUST]=Customer Record*

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require SED to hold certain information for specific periods other than those listed above.

### Where is your data stored?

All data we process under these services is stored within the European Economic Area (“EEA”). Please contact ScottishPower regarding their own data storage arrangements.

### What are your rights in relation to your personal data?

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

## Where can you find more information about SED's handling of your data?

If you have any queries regarding this Privacy Notice, about SED's processing of your personal data or wish to exercise your rights you can contact SED's proscribed Data Protection Officer, Andrew Bartlett, using this email address: [andrew.bartlett@advice.scot](mailto:andrew.bartlett@advice.scot).

If you are not happy with our response or require further information regarding data processing rules and regulations, you can contact the Information Commissioner's Office: <https://ico.org.uk/>.