

SIGMA CONNECTED GOVERNANCE

SCOTTISH POWER HARDSHIP FUND PRIVACY POLICY

VERSION 1, JULY 2022

1. OVERVIEW

Sigma Connected Support is a trading style of **Sigma Connected Limited**, a company registered in England and Wales with company registration number 01221157 and our ICO registration number is Z5155974.

We support **Scottish Power** with the administration of their Hardship and Pre-Payment Voucher funds. We do so as a *Data Processor* meaning that Scottish Power remain the *Data Controller* for your personal information. You can find out more about how they collect, store and process your data <u>here</u>. When you use this website, we will collect some information from you so that we can administer your application and this document details how, and the steps we take to protect your rights and freedoms under UK Law.

2. TYPES OF DATA, PURPOSES AND LAWFUL BASIS FOR PROCESSING

We collect the data you provide through this website and process it under the legitimate interest we have in supporting your application and any information or guidance we provide to you throughout the process.

We will collect your name, date of birth and contact details, account and metering details for your application and limited information from your browser or device to help our site work efficiently.

We will only use your data for the purposes listed here and all personal information is anonymised or deleted from our systems 3 years after the date it was collected.

3. THIRD PARTIES

To administer the Scottish Power Funds, we rely on some useful technology to make our service to you smoother and more effective. As such, we share certain information with the following third party sub-processors:

Third Party	Location of Processing	Types of Data Processed	Purpose
SalesForce.Com Heron Tower, 110 Bishopsgate, London. EC2N 4AY.	UK Servers Only	Name, date of birth and contact details, account and metering details plus any notes you provide in your application.	This is our Customer Relationship Management tool where we securely store and manage all our customer's personal data.
Trivoni Software Ltd, t/a MaxContact Manchester. M1 2AP.	UK Servers Only	Name, phone number, account number.	MaxContact provide telephone dialling management software to help us dial more efficiently.
Sigma Connected (Pty) Ltd Cape Town,	South Africa	Name, date of birth and contact details, account and metering details plus any notes you provide in your application.	We have over 1000, amazing people in our SA business, the team processing these applications are based here.

You will see on our main website that we operate in the United Kingdom, South Africa and Australia. All data is stored in the UK however some of our services, including managing the Scottish Power funds, are administered from our South African offices. We have been working this way for over 10 years and the 'connected' part of our company name relates to how we operate as one. We make absolutely sure our customers seamlessly receive the same high standards from all our offices and that data security is at the state of the art. All overseas processing is carried out under appropriate safeguards and for that we use something called the Standard Contractual Clauses. These set the expectations we have, they give clear instructions for the processing to be carried out and they provide all the necessary protections for you and your data. We have these in place between all our international companies, so even when sharing data between our own group, you know you are protected.

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4. YOUR DATA PROTECTION RIGHTS

UK protection laws give you lots of rights in relation to your data. These are really important for your privacy and to make sure that you have full control over any information that exists about you.

This is a list of your rights and how you can exercise them if you feel you need to.

4.1 YOU HAVE THE RIGHT OF ACCESS

If you want to know what information any data controller holds about you, you have the right to ask for copies of your personal information. You can do this by any communication method and we will not charge you for doing so.

4.2 YOU HAVE THE RIGHT TO RECTIFICATION

If you think any information that we hold about you is incomplete or inaccurate, tell us. We are required to rectify that information.

4.3 YOU HAVE THE RIGHT TO ERASURE

You have the right to ask us to erase your personal information in certain circumstances.

4.4 YOU HAVE THE RIGHT TO RESTRICTION OF PROCESSING

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

4.5 YOU HAVE THE RIGHT TO OBJECT TO PROCESSING

You have the right to object to the processing of your personal information in certain circumstances.

4.6 YOU HAVE THE RIGHT TO DATA PORTABILITY

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

4.7 YOU HAVE THE RIGHT TO COMPLAIN

If you are worried in any way about our use of your personal information, you can talk to us about it using any of the contact methods in this document. If you are so worried you wish to make a complaint, please contact our Data Protection Officer at DPO@sigfin.co.uk

Peter Hopgood-Gravett, Sigma Connected, Grosvenor House, Prospect Hill, Redditch, B97 4DL.

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

The ICO's address:

Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

5. DOCUMENT CONTROL

This Policy will be reviewed by the DPO as required, but at least annually.

5.1 CHANGE LOG

Date	Author	Summary of Changes	Version
July 2022	PHG	New Policy	1

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