

Scotia Gas Networks (SGN) Privacy Notice

22 May 2019



SGN

Your gas. Our network.

Contents

1. Welcome to the Scotia Gas Networks Ltd Privacy Notice.....	3
2. How we collect your personal data.....	3
3. Information collected from third parties.....	3
4. Information we may collect about you.....	4
5. If you fail to provide personal data.....	5
6. How we use your personal data.....	5
7. How we use your sensitive personal data.....	6
8. Automated decision making.....	7
9. Legal grounds on which we will use your personal data	7
10. Change of purpose.....	8
11. Who we share your personal information with.....	8
12. How your data is kept secure.....	9
13. How your information is transferred outside the EEA.....	9
14. How long we will use your information for.....	9
15. Your rights relating to your personal information.....	10
16. Data Protection Officer and complaints.....	10
17. Changes to this Privacy Notice.....	11
18. Cookies.....	11

1. Welcome to the Scotia Gas Networks Ltd (SGN) Privacy Notice

Scotia Gas Networks Limited (SGN) of St Lawrence House, Station Approach, Horley, Surrey RH6 9HJ is a data controller. **As such, we are committed to protecting and respecting your privacy.** SGN is made up of different legal entities and this Privacy Notice is issued on behalf of the SGN Group so when we mention SGN, “we”, “us” or “our”, we are referring to the relevant company in the SGN Group responsible for processing your data.

By "you" or "your" we mean any individual, sole trader and/or partnership that receives goods/services from us, uses our website or otherwise interacts with SGN.

This Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully; unless:

- you are applying for a job, in which case please review our Privacy Policy for Candidates, or
 - if you work for us or on our behalf, please review our Privacy Policy for Employees and Contingent Workers.
- If you require the above documents, please contact data.protection@sgn.co.uk.

It is important that you read this Privacy Notice together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

It should also be read in conjunction with any Terms and Conditions of Use of our website, and will form part of these.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the Privacy Notice of every website you visit.

If you have any questions, then please contact us and we will do our very best to assist you. We can be contacted at data.protection@sgn.co.uk or by writing to the Data Protection Team at the following address:

St Lawrence House, Station Approach, Horley, Surrey RH6 9HJ.

2. How we collect your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We, or third parties on our behalf, collect your personal information when you use our website, communicate with us by phone, letter, email, social media or in person, receive our services, or request to join schemes which you are eligible for. We may also collect your personal information from publicly available sources e.g. Members of Parliament, in order to provide an update on any works being undertaken in their constituency.

3. Information collected from third parties

We may also receive your personal information from the following third-party sources:

- **Other utilities companies** – eg information relating to individuals on the Priority Services Register so that we can provide an appropriate service to you or your contact details to enable us to arrange for works to be carried out on behalf of that company, as a service provider.

- **Councils, local authorities, housing associations or other landlords** – contact details so we can arrange works to be carried out.
- **Credit reference agencies** – when we conduct due diligence on prospective suppliers.
- **Law enforcement agencies** (such as the police) to identify and prevent fraud or crime.
- **SGN group companies** - for internal administrative purposes such as ensuring consistent delivery of our services to customers.
- **Department for Work and Pensions**, eg to check your eligibility for the Help to Heat Discount Scheme.
- **Members of the public** eg when contacting the gas emergency helpline to report a suspected gas escape.
- **Data providers** – including aggregated geo-demographic and lifestyle data to conduct statistical analysis. These customer insights help us to plan our marketing activities and conduct market research and business development.
- **Regulators, and the Courts** within the terms of their data privacy obligations.

4. Information we may collect about you

We may collect the following personal information:

- your name;
- address
- gender;
- date of birth;
- telephone numbers;
- e-mail addresses;
- details of a secondary contact (eg name and phone number);
- job title
- energy usage (eg meter readings and units of gas used over a period of time);
- details of state benefits that you receive;
- financial information (eg bank account or credit card details);
- permissions (eg if you have consented to be referred to your energy supplier's Priority Services Register);
- if you are a home owner or renter;
- survey responses;
- your Meter Point Reference Number (MPRN), that identifies your gas supply;
- if you are applying to our Help to Heat Scheme, details about your income;
- if you wish to attend one of our sponsored events, venue and dietary preferences, accessibility requirements and an emergency point of contact;
- if you visit our website, we store your IP address, the browser software you use and your behaviour on our website (for example, the pages that you click on). This information is collected through cookies. More information about how we use cookies can be found below;

- if you engage with us through social media, we collect your name and store a link to your relevant social media profile, which we combine with details of your previous correspondence with us;
- If you engage with us through stakeholder engagement, we collect your preference on the type of information you would like to receive from us;
- if we, or third-party suppliers, carry out a home visit, we may collect personal information about you or a member of your household from that visit, e.g. we may record information if you or a member of your household may benefit from Priority Services;
- Other operational personal data created, obtained, or otherwise processed while carrying out our business activities, including but not limited to, photographs, CCTV footage, recordings of telephone conversations, logs of visitors, and logs of accidents, injuries and insurance claims.
- Audio, video recordings, live stream footage and/or videography or other image(s), if your consent has been given, in connection with SGN's business purposes, for advertising promotion and other commercial and business purposes;

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- Relating to your health if:
 - you are applying to our Help to Heat Scheme
 - to provide you with the necessary support when attending SGN sites and/or events taking place outside SGN sites, including operational incidents
 - you are involved in an accident on any SGN premises or work site, we will record details of your injuries as part of our Health and Safety Injury Investigation and Report.
- If we suspect that someone has committed fraud or stolen energy, e.g. by tampering with a meter or diverting the energy supply, we will record that information.

If you would like to know what information we hold about you, or change any of the details that you have provided us, you can ask us. Please see the section below entitled 'Your rights'.

5. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (e.g. to provide you with a new gas connection) or meet our legal obligations (e.g. equal opportunities or health and safety requirements).

6. How we use your personal data

We, or third parties on our behalf, collect, use and store the personal information collected about you to:

- Effectively respond to and deal with your query if you contact us;
- Respond to and deal with an emergency;
- Supply you with goods and/or services you have requested;
- Supply your employer with goods and/or services they have requested:

- Notify you of any work(s) SGN may be undertaking in your area;
- Manage our assets which affect your property;
- Consult with you when our works may affect your property;
- Facilitate your access to our on-site facilities;
- Ensure the health and safety of you, our staff and contractors;
- Obtain your views on SGN's services, development projects or planning proposals;
- Enable internal corporate reporting, business administration, adequate insurance coverage, the security of company facilities, research and development, and to identify and implement business efficiencies;
- Provide training/learning services;
- Monitor and/or record conversations with customers for staff training and/or audit purposes;
- Investigate, respond to and/or process any complaints, claims for loss, damage and/or injury;
- Prevent and/or detect crime;
- Process information that is required or requested by regulatory bodies or law enforcement agencies;
- Comply with any procedures, laws and regulations which apply to us – including where we reasonably consider it is in our (or others) legitimate interests to comply;
- Establish, exercise or defend our legal rights – including where we reasonably consider it is in our (or others) legitimate interests;
- Aggregate/process personal data for research, statistical and/or scientific purposes in accordance with SGN's commitment to health, safety, environmental, commercial interests and/or security purposes;
- Use information collected from your visit to our website for administrative purposes; for troubleshooting, data analysis, testing, research and statistical and survey purposes; to ensure content is presented in an effective manner; and to enable you to participate in interactive features;
- Ensure you see relevant and interesting content on our website(s) using your electronic information (cookies) in line with our website terms and conditions;
- Conduct, and contact you in relation to, market research e.g. through customer satisfaction surveys and questionnaires; and
- Any other processing for which you have given your consent, for example, receiving marketing information via email or SMS.

7. How we use your sensitive personal data

We treat some of the information that we collect about you as being particularly sensitive, such as information about your health or details of criminal convictions. We will use this information in the following ways:

- With your consent, we'll use the information we collect about your (or a member of your household's) requirements for your welfare (eg due to age, health or disability) to:
 - respond appropriately during a major incident or emergency situation;
 - provide products and/or services to you in the most appropriate way eg if you require large print or braille communications;
 - manage staff and third-party contractors; and

- provide you with the most appropriate customer experience where you attend an SGN event.
- If you are involved in an accident on any SGN premises or work site we will record information about your injuries as part of our Health and Safety Injury Investigation and Report.
- If we suspect that someone has committed fraud or stolen energy, eg by tampering with a meter or diverting the energy supply, we will use that information for the following purposes:
 - to ensure integrity of the network from a safety perspective;
 - to make decisions about whether to disconnect your supply;
 - to potentially charge you for energy used;
 - to provide information to your registered supplier regarding potential theft downstream of the emergency control valve;
 - liaise with gas suppliers and 3rd parties to aid the registration process; and
 - to detect and prevent fraud or crime.
 -

8. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

9. Legal grounds on which we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. These include:
 - Run, grow and develop our business;
 - Meet our contractual obligations with third parties;
 - Detect and prevent fraud;
 - Enhance the security of our network and information systems;
 - Ensure that our own processes, procedures and systems are as efficient as possible;
 - Better understand how people interact with us;
 - Analyse and enhance the information that we collect;
 - Determine the effectiveness of our marketing campaigns; and
 - Enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers.
- As a regulated entity, we are subject to various legal and regulatory obligations which require us to process your personal information. For example, we are obliged to comply with our gas transporters

licence, the Gas Act 1986, the conditions set out by Ofgem and Health and Safety legislation. Where we are required to do so, we will process your personal information to comply with all applicable laws, rules and regulations.

- We will sometimes use your personal information based upon your consent. We will always tell you where this is the case and ask you to agree before we process your information. An example of using your personal information with your consent is where you would like us to refer you to be added to the Priority Services Register or to send you marketing material by SMS or e-mail.
- On rare occasions, we may process sensitive information about alleged criminal offences to prevent or detect unlawful acts in the substantial public interest.

Please note that some of these grounds overlap and we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

10. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Team.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

11. Who we share your personal information with

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Recipients of your personal data may include the following categories:

- Employees, workers and parties contracted to act on behalf of SGN who need to know your personal information for the purposes set out above. For example:
 - Operational staff carrying out work at your address
 - IT staff performing system maintenance support
 - Legal advisors
 - Auditors
- Your registered utility company.
- Independent gas transporters, if you live in an area covered by a local gas transportation network.
- Local authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies for complying with applicable laws and regulations, or in response to legal processes.
- Emergency Services, eg police, fire and ambulance

- Individuals requesting environmental information, or those requesting details of personal information we hold about them, may in some circumstances, and in accordance with the law, have limited access to some of your personal information.
- Other SGN Group entities as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.
- Other third parties if we have your consent, for example: social services, charities, health-care and other support organisations.

12. How your data is kept secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. How your information is transferred outside the EEA

We utilise support services which involve the transfer of personal information we collect about you to the following countries outside the outside the European Economic Area*:

- USA
- India

There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, as appropriate:

- standard contractual clauses adopted by the European Commission, and/or
- self-certification with the EU-US Privacy Shield.

**The European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.*

14. How long we will use your information for

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which can be obtained from our Data Protection Team.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our Data Retention Policy or any applicable laws and regulations.

15. Your rights relating to your personal information

Under certain circumstances, you have the right to:

- **Request access** to your personal information (subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Right to withdraw consent** in the limited circumstances where you may have provided your consent to process your personal information for a specific purpose. Once we have received your notification, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

You can make a request to do any of the above, by contacting our Data Protection Team in writing. We have a form to complete for Subject Access Requests and you can find out more by reading our Data Subject Rights Procedure which can be accessed by contacting data.protection@sgn.co.uk.

We may need to request specific information from you to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal information is not disclosed to someone who has no right to receive it.

You will not have to pay a fee. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

16. Data Protection Officer and complaints

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact SGN's Data Protection Team at data.protection@sgn.co.uk or:

Data Protection Team
SGN Legal and Compliance
St Lawrence House, Station Road
Horley
RH6 9HJ

If you need further clarification, are unsatisfied with our actions or wish to make an internal complaint, you may contact the **DPO** directly in the first instance at the above address. If you are still unsatisfied, you can contact the **Director of Legal and Compliance** in writing at the above address.

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Supervisory Authority. The **Information Commissioner's Office** (ICO) can be contacted at: -

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
Email: enquiries@ico.org.uk

17. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

18. Cookies

SGN utilise cookies to enhance your browsing experience.

- **What cookies are** - most websites use cookies, including this one. A cookie is a small text file that a website sends to your computer or mobile device. When you visit a site again, the cookie is sent back to the website. This helps to make your online life easier because websites are able to remember choices you made and work more efficiently for you.

Cookies are plain text files. They can't run programs behind your back or infect your computer with a virus. They can't scan your computer for personal information.

- **How we use cookies** - we use Webtrends to count the number of visitors to the site and tell us things like which pages are most popular, how long visitors spend on a page and the average number of pages viewed. This works through cookies, but they don't tell us who you are or send us any personal information about you.
- **How to manage cookies** - you can delete cookies stored on your computer or change your privacy settings at any time through your browser settings. Follow the links below to find out more:

[Internet explorer](#)

[Chrome](#)

[Firefox](#)

[Safari](#)

[Opera](#)

- **What happens if you don't allow websites to send you cookies** - this website will still work and you will be able to get the information you need from it. It means we won't be able to monitor how you use our site and help us make it as useful as possible.

In the future we may add features that rely on cookies and you would not be able to benefit from them. We will update the information on this page when this applies.

Other websites that use cookies to provide many of their personalisation features will not work properly if you decline cookies.

- **More information** - you can find out more about cookies on the [all about cookies website](#).