

Scotia Gas Networks (SGN) Privacy Notice

2024



SGN

Your gas. Our network.

Scotia Gas Networks Ltd (SGN) Privacy Notice.....3

1 Collection of personal data.....3

2 How we use your personal and / or special category data4

3 Who we share your personal information with.....6

4 Failure to provide personal data.....6

5 Change of purpose6

6 Retention and Security7

7 Data transfers outside of the EEA7

8 Your data protection rights.....7

9 Data Protection Office and complaints8

10 Changes to this Privacy Notice.....8

11 Cookies9

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. 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. Contact details can be found at [Section 9](#) of this Notice.

1 Collection of personal data

We collect your personal data from a variety of sources:

Directly from you	<ul style="list-style-type: none"> • Through use of our website • Communication with us via phone, letter, email, social media or in person • When you receive our services • Request to join schemes you are eligible for
From third parties	<ul style="list-style-type: none"> • Other utilities companies and the Central Data Service Provider <ul style="list-style-type: none"> ○ information relating to individuals on the Priority Services Register so that we can provide an appropriate service to you ○ your contact details to enable us to arrange for works to be carried out on behalf of that company, as a service provider ○ to allow us to contact you to notify you directly of any planned or unplanned supply interruptions to your gas supply. • Councils, local authorities, housing associations or other landlords <ul style="list-style-type: none"> ○ Contact details so we can arrange works to be carried out. • Credit reference agencies <ul style="list-style-type: none"> ○ When we conduct due diligence on prospective suppliers. • Law enforcement agencies (such as the police)

	<ul style="list-style-type: none"> ○ to identify and prevent fraud or crime. • SGN group companies <ul style="list-style-type: none"> ○ for internal administrative purposes such as ensuring consistent delivery of our services to customers. • Department for Work and Pensions <ul style="list-style-type: none"> ○ To check your eligibility for the Help to Heat Discount Scheme. • Members of the public <ul style="list-style-type: none"> ○ when contacting the gas emergency helpline to report a suspected gas escape. • Data providers <ul style="list-style-type: none"> ○ 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.
Publicly available sources	<ul style="list-style-type: none"> • Members of Parliament <ul style="list-style-type: none"> ○ to provide an update on any works being undertaken in their constituency. • Registers of Scotland and the Land Registry <ul style="list-style-type: none"> ○ To identify ownership of land and property • Companies House <ul style="list-style-type: none"> ○ To identify directors (and others) of companies

2 How we use your personal and / or special category data

Please note that some of the below overlap, and we may process your personal data for more than one activity and lawful basis depending on the specific purpose for which we are using your data.

Data processing activity	Type of Data	Our Lawful Basis for processing your data
Carry out emergency work	Name, address, contact details, accessibility requirements, photos and videos of property and assets, if required.	Legal Obligation and / or Legitimate Interests
Carry out works in your street and / or your property (including notification to you)	Name, address, details of your property, accessibility requirements, photos and videos of property and assets, if required	Legal Obligation and / or Legitimate Interests
Connections work	Name, address, contact details, details of your property, accessibility requirements, MPRN, financial information	Contractual
Complaints and enquiries	Name, address, contact details, details of your enquiry / complaint	Legal Obligation and / or Legitimate Interests

	and any supporting information you provide to us, call recordings.	
Visiting our sites	Name, address, contact details, car registration, access logs, CCTV footage	Legitimate interests
Manage SGN assets	Name, address, details of your property (including photographs / videos if required), MPRN, gas usage	Legal obligation
Paying you / receiving payment	Name, address, details of the works carried out, payment details.	Legal Obligation and / or Legitimate Interests
Customer Referrals to the Priority Services Register or additional support lines if required for vulnerable customers and to support during any major outages	Name, address, contact details, referral information, MPRN, PSR code income information (if required for Help to Heat Scheme)	Legitimate interests and Substantial public interests
Surveys / questionnaires	Name, address, contact details, thoughts/opinions	Legitimate Interests or consent
Stakeholder / community events	Name, address, contact details, dietary preferences, accessibility requirements and an emergency point of contact	Legitimate Interests or consent
Newsletters	Name, contact details, subscription information	Legitimate interest or consent
Personal Safety	We may record information against an MPRN if it's been recognised there is a health and safety risk to employees at a property or area code.	Legal obligation
Health and Safety incidents	Name, contact details, details of incident, logs of accidents, injuries (including health information)	Legal obligation, vital interests, or consent (depending on the circumstances)
Insurance claims	Name, contact details, details around claims including any supporting information which could include health details.	Legitimate Interests
Criminal or fraudulent activity e.g., by tampering with a meter or diverting the energy supply	Name, contact details, utility provider, details around activity, costs involved.	Legal Obligation and / or Legitimate Interests
Communications and promotional events	Audio, video recordings, live stream footage and/or videography or other image(s)	Consent

Website traffic	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 <u>cookies</u> .	Consent
------------------------	---	---------

3 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 approved 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 property
 - IT support staff
 - Legal advisors
 - Auditors
- Your registered utility company, and when required, additional utility companies for example if you ask us to register you on the Priority Services Register.
- Independent gas transporters if you live in an area covered by a local gas transportation network.
- Local authorities, courts and tribunals, regulatory bodies, government agencies and/or law enforcement agencies for complying with applicable laws and regulations, for reporting purposes, or in response to legal processes.
- Emergency Services, e.g., 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, healthcare, and other support organisations.

4 Failure 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).

5 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 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.

6 Retention and Security

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.

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.

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.

7 Data transfers outside of the EEA

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

Abu Dhabi, Australia, Brazil, India, Philippines, Singapore, USA**

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
- appropriate technical and organisational measures

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

*** Some companies we work with, who transfer to the USA are signed up to the EU-US Data Privacy Framework and therefore additional protection measures are not required.*

8 Your data protection rights

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.
- **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.
- **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** where you may have provided your consent to process your personal information for a specific purpose.
- **Rights related to Automated decision making** when an electronic system uses personal information to decide 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.

You can make a request to do any of the above, by contacting our Data Protection Team on data.protection@sgn.co.uk.

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.

9 Data Protection Office and complaints

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 **Chief of Legal** in writing at the above address.

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the **Information Commissioner's Office** (ICO), and 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

10 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.

11 Cookies

SGN utilise cookies to enhance your browsing experience. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Types of cookies we use

We use three categories of cookies:

- **Necessary Cookies** - These are cookies that are essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.
- **Analytics cookies** – Analytics cookies are used to understand how visitors interact with the website, which helps in delivering a better user experience for our website users and customers.
- **Functional cookies** - We use these cookies to improve our website’s functionality They may be set by us, or by third party providers whose services we use on our site.

We use the following cookies on www.sgn.co.uk, and we may use some or all of these cookies on other SGN group websites.

Cookie	Name	Purpose
Google Analytics	_ga _gat _gid	These cookies are used to collect information about how visitors use our website, including the number of visitors to the website, where visitors have come to the website from and the pages they visited. We use the information to compile reports and to help us improve the website. The cookies collect information in a way that does not directly identify anyone and store information anonymously.
SiteImprove	nmstat	This cookie is used to collect information about how visitors use our website, including how they interact with our content and navigate the website. We use the information to compile reports and to help us improve user experience of the website. The cookie does not contain any personal information.
	AWSELBCORS	This cookie is used for load balancing, in order to optimize the service. It also stores the information regarding which server cluster is serving the visitor.
eGain webchat	EG-U-ID EG-S-ID EG_CUST_SEC EG-SEQ-ID	This cookie is set by the eGain product we use to deliver our online chat functionality. These cookies are used to identifying new users, new sessions, and web traffic sources.
	JSESSIONID	Used by sites written in JSP. General purpose platform session cookies that are used to maintain users' state across page requests.

	AWSELBCORS	This cookie is used for load balancing, in order to optimize the service. It also stores the information regarding which server cluster is serving the visitor.
--	------------	---

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:

- Google Chrome - <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Microsoft Edge - <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- Mozilla Firefox - <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Microsoft Internet Explorer - <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera - <https://www.opera.com/help/tutorials/security/privacy/>
- Apple Safari - <https://support.apple.com/en-gb/safari>

Find out more about cookies

To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.