

Group Data & Information Management Policy

Policy statement

SSE's policy is to collect and use all data responsibly and securely and to maximise the use of its data assets in an ethical and sustainable way to achieve a low cost, low carbon future for energy consumers.

Policy purpose

The purpose of this policy is to ensure SSE meets its legal and regulatory requirements for data management, retention and reporting, and manages data assets in line with the strategic vision to be a "leading energy company in a low carbon world".

This policy is owned by the General Counsel and is one of a suite of group-level policies that promote a healthy business culture, guide decisions and actions as expected by the company's stakeholders, and make SSE a responsible company that people want to invest in, buy from, work for and partner with.



Liz Tanner
General Counsel



Alistair Phillips-Davies
Chief Executive Officer



POLICY PRINCIPLES

The following principles highlight how we expect the policy statement to be achieved, and should be used to guide behaviours, decision making and action:

Data Governance	<ul style="list-style-type: none"> • SSE recognises the importance of being a data driven business and to enable this goal our data should be both democratised and managed as an asset. • We use Data Governance to continually mature our Data Management Capabilities including standards & compliance and embed best practice through accountability, ownership, policies and procedures. • We develop and actively manage data strategies linked to business strategies which allow us to measure value delivered and focus collectively on the biggest opportunities.
Data Management	<ul style="list-style-type: none"> • SSE's Data Management approach is driven by business benefits and aims to reduce risk and improve profitability. We govern the creation, use, storage and destruction of both digital and physical information in all its forms (documents, records, content) and knowledge. • We adopt data quality management practices that create trusted data sources for informed decision making. • We support the usability and visibility of data and drive analytics via a documented library of shared information assets. • We aim to take a leading role in the energy industry's drive towards open and interoperable data to meet the needs of wider stakeholders and energy consumers. Data Management activity is targeted, relevant and effective and aims to achieve: <ul style="list-style-type: none"> ○ Legal and Regulatory Compliance (including reporting) ○ Effective Risk Management ○ Improved Productivity & Efficiency ○ Informed Decision Making ○ Accurate Reporting ○ Delivery of Analytics /Future Technology Enablement • We manage our data in line with a number of principles to ensure that it is controlled, understood and trusted for use.

	<ul style="list-style-type: none"> ○ Data management activities are driven by business outcomes ○ Data is owned and curated as an asset ○ Data improvements are achievable and measurable ○ Data is readily accessible but shared legally and securely ● We store and share our data in a safe, secure manner in line with the Information Classification Standard. We observe confidentiality of Business Units and ensure business separation through restriction of access to information as appropriate including that provided by customers and suppliers.
Personal Data	<ul style="list-style-type: none"> ● SSE is committed to collecting and using personal data responsibly, securely and fairly. We want people to understand how we use their data and to become a trusted partner with our customers; we protect the personal data of our employees to the same high standards. ● Personal data shall be: <ul style="list-style-type: none"> ○ Processed lawfully, fairly and in a transparent manner ('lawfulness, fairness and transparency') ○ Collected for specified, explicit and legitimate purposes ('purpose limitation') ○ Adequate, relevant and limited to what is necessary ('data minimisation') ○ Accurate and, where necessary, kept up to date('accuracy') ○ Kept for no longer than is necessary for the purposes for which the personal data are processed; ('storage limitation') ○ Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').