For the purposes of this notice, 'we', 'us', 'our' and 'National Grid' will always refer to National Grid PLC, whose registered office is 1-3 Strand, London WC2N 5EH. National Grid is a Data Controller, which means we are responsible for deciding how and why we hold and use Personal Information about you.

This Notice describes the types of information collected, how that information is used and disclosed, and what your rights are in relation to that information.

#### Information we process about you

The following information is processed in relation to our shareholders:

Name, address, bank sort code and account number; email address; no. of shares; date of death; Corporate Action election options; phone number; and voting instructions; voice recordings; date of birth for the purposes of understanding when minors reach the age of 18.

### How we use your information

We use your personal information for the following:

- Register share maintenance i.e. Change of address, bank mandate details, name change, Notification of death, registration of death, legal document processing. Lost certificate notifications, reissue of certificate. Market & Non-Share transfers, CREST processing, respond to any correspondence you send;
- Pay dividends or other similar payments to you;
- Provide special requests such as requests for large print documents or any other vulnerable customer information;
- Dealing with complaints and queries;
- To understand the composition of our shareholders;
- Allow you to exercise your rights as a shareholder, such as the right to vote at shareholder meetings; and
- Meeting management notice of meeting data, proxy form completion, and companies' annual report accounts. Returned proxy forms detailing instructions on the company's meeting resolutions are data captured.

Information is also processed for legitimate business interests

Your voice may be captured and recorded, for example within a webcast recording of a shareholder meeting which you attend.

# How we collect your information and who we share it with

We have engaged Equiniti Limited as our ordinary share registrar. Equiniti Limited and other Equiniti Group entities ("Equiniti") maintain the National Grid plc shareholder register and processes shareholders' personal information on our behalf.

Your personal information is collected when you provide it to us, to Equiniti or to other third parties engaged to carry out services on our behalf, for example when you provide information in writing or provide your details via Equiniti's website. Your information is also collected when you exercise rights attached to your shares, such as voting. Your information might also be provided to us or to Equiniti by third parties, for example by an agent through which you trade in National Grid plc shares.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. Personal data will be shared with members of the Equiniti Group outside of the European Economic Area (EEA) and the European Union (EU), including Equiniti India Private Limited which is based in India, for the purposes described in this Privacy Notice. For these transfers we utilise Model Clauses recognised by the European Commission. In providing shareholder services to National Grid, Equiniti may also be acting as a Data Controller, for example when you register an account on their website, or where they have a legal obligation to make certain disclosures. For more information on how Equiniti use your data please refer to the relevant privacy notices as published on their website.

# How long we keep your data

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data. We will then either securely delete it or anonymise it so that it cannot be linked back to you.

We will retain personal data for the duration of your entry on the Register of Members for a period of up to 12 years following your last entry on the Register or completion of service e.g. payment of unclaimed dividends, for the reasons noted below:

- To respond to enquiries and complaints;
- To demonstrate that your instructions were carried out properly; and
- To maintain records to meet rules and regulatory requirements that are applicable to the administration of the Register.
- We can keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons. We can also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes

# How we Protect your information

Equiniti safeguards your personal data across all computer systems, networks, websites and offices as much as possible through appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) and their Information Security policies are aligned to ISO27001, which is an internationally recognised security standard.

Within National Grid access to your data is restricted to the Company Secretariat team.

### **Your Data Protection Rights**

Under Data Protection Legislation you have the rights as outlined below:

**The right to access** information we hold about you, why we have that information, who has access to the information and where we obtained the information from;

**The right to correct and update** the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated;

**The right to have your information erased.** If you feel we should no longer be using your data, you can request that we erase the data that we hold. Upon receiving a request for erasure, we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest and this interest does not override your interests, fundamental rights and freedoms);

The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.

**The right to data portability**. You have the right to request that we transfer your data to another controller.

The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

The right to withdraw consent at any time where we are relying on consent as a legal basis to process your personal data.

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Having confirmed your identity we will act on your request as soon as possible, and at a minimum within one month of receiving it. There are no fees or charges for the first request. However multiple additional requests for the same data received within one month of the first request may be subject to an administrative fee of £25 per request.

**To exercise your rights** please do so by writing to: Data Protection Team,

National Grid Records Centre, Unit 1, Europa Court Europa Boulevard, Warrington, WA5 7TN Or e-mail dataprotection.af@nationalgrid.com

### What can I do if I am not satisfied with how my personal information is processed?

At National Grid we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you wish to raise a complaint on how we have handled your personal information please contact please contact us in the first instance so we can resolve your queries or provide you with any additional information required. If you remain unsatisfied with our response it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK, the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office https://ico.org.uk/make-a-complaint/ or call them on 0303 123 1113.

#### For more information

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at **.box.ngtuk.dataprotection.ia** 

#### **Changes to this privacy policy**

This Privacy Notice was last updated on 16 September 2019. If it is necessary for us to alter the terms of the Privacy Notice, we will post the revised Privacy Notice on the Shareholder Information section of the Investors Section of National Grid's website. We encourage you to frequently review the Privacy Notice for the latest information on our privacy practices.