

# Shareholder Privacy Notice



**drax**

## Shareholder Privacy Notice

### WHAT'S THE PURPOSE OF THIS DOCUMENT?

This privacy notice is intended to provide information regarding how any personal information we collect from you or from third parties about you before during and after your working relationship with us will be processed within the Drax group of companies. It relates to personal data/information (defined under data protection laws) about you that we refer to as personal information in this notice.

### WHO COLLECTS THE INFORMATION?

Drax Group plc will be collecting and processing your personal information. This means that we are responsible for deciding how we hold and use personal information about you. It is important that you read this notice so that you are aware of how and why we are using your personal information and how we will treat it. Depending on the circumstances, we may on occasion provide you with a shorter privacy notice to cover specific types of processing that will be supplemented by this notice.

This notice applies to current and former shareholders. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time, so you are advised to review this notice at regular intervals. We respect your privacy and are committed to protecting your personal information. Our Group Data Protection Officer is responsible for overseeing questions in relation to this notice. If you have any questions about this notice, please use the contact details set out at the end of this notice in the "Contacting Us" section.

This privacy notice extends to the share registry services provided by Equiniti Limited ("Equiniti"). We have appointed Equiniti to manage our register of shareholders. Equiniti's role as share registrar includes keeping an up-to-date record of shares held by shareholders, administration of dividends, managing share transfers, issuing share certificates, and supporting other functions. Equiniti, in carrying out share registry services will process information about you as a shareholder on behalf of Drax.

We would direct you to Equiniti for information on their privacy notice and cookie policy which applies when you use their website or online services which can be found [here](#).

From time to time, Drax may appoint alternative organisations to provide share registrar services, and this privacy notice extends to the activities that those organisations may carry out on our behalf.

### DATA PROTECTION PRINCIPLES

We will comply with UK data protection laws ensuring the personal information we hold about you is:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely

### THE KIND OF INFORMATION WE WILL HOLD ABOUT YOU AND WHY

We will collect and use personal information such as (but not limited to) your:

- Name
- Address
- Telephone number
- Bank sort code and account number
- Email addresses
- Date of death
- Number of shares held
- Dividend payment values
- DOB
- NI number
- Corporate Action election options (if applicable)

We collect this personal information when you provide details to us directly or through your agents such as your broker or share plan administrator

We use your personal information (with the support of Equiniti) for managing your shareholding in Drax which will include:

- Contacting you with details of our Annual General Meeting, dividend distributions, resolutions, and reports.
- Administering your instructions as a shareholder and responding to issues raised.
- Maintaining an up-to-date share register.

Data protection laws require us to meet certain conditions before we are allowed to use your personal information and we will rely on one or more of the following grounds:

- **Consent:** in certain circumstances, we may need your consent unless authorised by law, to use personal information about you
- **Necessity to establish, exercise or defend legal claim:** if you, or we, bring a legal claim against the other, we may use your information in either establishing our position, or defending ourselves in relation to that legal claim.
- **Compliance with a legal obligation:** where laws or regulations may require us to use your personal information in certain ways. For example.
  - Managing your shareholder rights and our obligations to you as a shareholder pursuant to our Articles of Association and all relevant laws; and
  - Meeting our obligations to our regulators.
- **Legitimate Interests:** we will also process your personal information where this processing is in our "legitimate interests". When relying on this condition, we are required to carry out a balancing test of our interests in using your personal information, against the interests you have as a citizen and the rights you have under data protection laws. The outcome of this balancing test will determine whether we can use your personal information in the ways described in this privacy notice. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

For marketing, you will always be given a choice over the use of your data.

### WILL WE SHARE YOUR PERSONAL INFORMATION WITH ANYONE ELSE?

We do not disclose your information outside of Drax except to:

- Equiniti or any other organisation appointed as our share registrar.
- Any organisation appointed by us or Equiniti to trace shareholders.
- Payment providers assisting in the administration of dividend payments or other relevant payments to and from shareholders.
- Other members of the Drax group of companies as necessary to administer our business, regulators, which include the Financial Conduct Authority, the London Stock Exchange, HM Revenue and Customs, and the Information Commissioner's Office.
- Where we are required or permitted to do so by law or relevant regulatory authority (e.g., financial crime screening, fraud detection/prevention).

### TRANSFERRING INFORMATION OUTSIDE THE UNITED KINGDOM (UK),

Most of the personal information we collect about you will remain in the UK. Where a service provider is based outside the UK, they are required to comply with data protection law. If that is the case, we ensure a similar degree of protection is afforded by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the relevant regulator; or
- where we use certain service providers who are not in a 'adequate' country, we may use specific contracts approved by the regulator which give personal information the same protection it has in the UK. If you would like to know the specific mechanism used by us when transferring your personal information out of the UK, please contact us using the details in the "Contacting Us" section at the end of this notice.

### FOR HOW LONG WILL WE KEEP YOUR INFORMATION?

We store your personal as determined by our data retention policy, as well as is required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

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 we process your personal data for and whether we can achieve those purposes through other means, and applicable legal requirements.

Your personal information will be retained under one or more of the following criteria:

- Where the personal information is used to provide you with services as a shareholder, which will be kept as long as it is required to fulfil our obligations to you as a shareholder.
- Where you have sold your shareholding, we may retain your personal information for as long as required by statutory authorities to meet our obligations for accounting, legal, tax, and regulatory purposes.
- For as long as your information is required to allow us to conduct fraud and/or criminal checks and investigations.
- For as long as is required in the event that we have a reasonable expectation of litigation.

### RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

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 working relationship with us.

### Your rights in connection with personal information

Data protection laws provide you with rights when your data is processed in the UK:

- Request information about how and with who your personal information is being used or shared.
- Request access to your personal information. 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 in certain circumstances. 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 (see below). However, this is not an absolute right and there will be circumstances where we are required to retain your personal information even if you are no-longer a shareholder of ours.
- Request the restriction of processing of your personal information in certain circumstances. 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.
- Request the transfer of your personal information to yourself or another party.

You also have a right to object to the processing of your personal information.

If you want to exercise any of these rights, please contact us using the details in the "Contacting Us" section at the end of this notice.

Please note, you have the right to make a complaint at any time to the regulator for data protection issues as follows:

[UK Information Commissioner's Office \(ICO\)](#)

We would, however, appreciate the chance to deal with your concerns before you approach the regulator, so please contact us in the first instance using the contact details set out at the end of this document.

You will not usually have to pay a fee to exercise any of your rights. 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.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure you are entitled to exercise a right. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### Timing of our response

We do our best to respond to all legitimate requests within 30 days. Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the details in the "Contacting Us" section at the end of this notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## CHANGES TO THIS PRIVACY NOTICE

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

## CONTACTING US

If you wish to make an individual rights request, or you are a law enforcement or government organisation wishing to make an enquiry, please visit our [secure portal](#) or write to us at:

Data Protection Officer  
Drax Power Station  
Selby  
North Yorkshire  
YO8 8PH

Effective from August 2024