

PERSONAL DATA PROTECTION STATEMENT OF enaon SUSTAINABLE NETWORKS SINGLE MEMBER S.A. «enaon»

(According to the General Data Protection Regulation E.E. 2016/678)

(2st Edition, 14/02/2024)

1 General

Enaon, member of Italgas Group, recognizes the importance of Privacy and Security of personal data and addresses with due seriousness. With this privacy statement we would like to inform you about the policy of our Company's Policy regarding the collection and processing of personal data under the applicable legislation on the Protection of Personal Data.

2 Definitions

Data Protection General Regulation (DPGR – EU GDPR)

EU Regulation 2016/679 of 27th April 2016 for the protection of natural persons about personal data processing as well as the free flow of data and abolition of the Directive 95/46/EK.

Business Activities

The mission of enaon is to develop natural gas networks through EDA HELLENIC GAS DISTRIBUTION COMPANY Single Member S.A. (enaon EDA), ensuring the distribution of gas in the licensed areas, as defined in the granted Natural Gas Distribution Licenses and in the Natural Gas Distribution Network Management Licenses, as provided for in the current legislation. In particular, in the contexts of the above activities the construction, maintenance, operation, management and exploitation of the Natural Gas Distribution Network are included in the above activities. The Company operates with respect to the legal and regulatory framework guided by its Operational Independence, fulfilling all its obligations. The Company's obligations indicatively consist of ensuring the reliability of the network, maintaining a technically complete and efficient network as well as compliance with the technical specifications and design requirements for operation and maintenance, thus achieving high performance targets for the distribution activity.

Personal Data	Any information concerning an identified or identifiable natural person (“Data Subject”) · an identifiable natural person is the person who can be identified directly or indirectly, in particular, by reference to an identifier such as a name, an ID number or location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, financial, cultural or social identity of the specific natural person.
Special Categories of (sensitive) personal data	Data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or participation in a trade union organization, as well as the processing of genetic data, biometric data for the purpose for the purpose of indisputable identification of a person, data relating to health or data relating to the sexual life of a natural person or sexual orientation. Also includes data related to criminal convictions and offences.
Processing	Any action or set of actions performed, whether or not by automated means, on personal data or on sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of availability, alignment or combination, restriction, erasure or destruction;
Head of Processing	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the personal data processing· where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for his or her designation may be provided for by Union or Member State law;
Processor	The natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Head of Processing.
Third Party	Any natural or legal person, public authority, agency, or body, with the exception to the subject of the data, Head of Processing or Processor, and persons who, under the direct authority of the Head of Processing or Processor, are authorized to process personal data.
Data Subjects Consent	Any freely given, specific, explicit and informed indication of intent by which the data subject signifies his or her agreement, by statement or explicit affirmative action, to the processing of personal data related to them.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access of personal data transmitted, stored or otherwise processed.

3 What Personal Data do we Process and where do we collect them from?

Enaon collects and processes personal data of its customers (former, existing, and potential) which are strictly necessary for the processing of their requests regarding the provision of the above (see Business Activity) mentioned services and have been submitted through our website by filling in an electronic contact form for the expression of interest in connection or for the submission of a request/complaint.

In addition, there are cases where enaon holds your personal data because it was provided by you in some capacity. In particular, in case we receive your curriculum vitae (CV) as part of an online job application, we will keep the information provided to us in case a suitable position becomes available within the Company for a period of two (2) years.

By submitting your personal data to enaon, you consent to the use of your data as provided in this Statement. In addition, you consent to the use of this data by contracted partners of the Company, solely for the purpose of informing you about natural gas, connections as well as technical support. Your personal data will not be processed or distributed for further purposes, unless required by the law and regulatory framework or by the signed contract or other legal obligations of the Company.

A. In relation to our existing, potential, and former customers, we collect basic identification information and more specifically:

I. In case of expression of interest through:

- Physical presence in the store
- Visiting the Company's website
- Call Center of the Customer Service Department (call center)
- Network of authorized partners or heating professionals (engineers, plumbers, etc.)
- Network Distribution users
- Representatives of technical autopsies - market development

The data collected includes: first name, surname, company (optional field), status, street, street number, municipality, postal code, contact number, e-mail address and any other appropriate as necessary, for the initial assessment of the expression of interest.

II. In cases of Natural Gas Connection Contract through:

- Physical presence in the store
- Network of authorized partners or heating professionals (engineers, plumbers, etc.)
- Distribution network users
- Representatives of technical autopsies - market development
- e-Contract Services
- Call Center

The data collected include, first name, surname, e-mail, status, street, street number, municipality, postal code, contact number, e-mail address, tax information (tax identification number/Tax Office), ID/Passport details as well as connection details such as property address, between vertical roads, the existence of supply, no. of independent apartments, the supplies address, type of property/delivery point, floor, customer category and any other as necessary, for the approval of the connection application.

III. In case of ancillary services by:

- Physical presence at the Company
- E-mail address
- Network Distribution Users

The data collected may include the following: Electronic Delivery Point Identification Code, first name, surname, contact number, address, VAT identification number/Tax Office and any necessary data, for the performance of the ancillary service.

IV. In case of submitting a study / construction of a new buildings internal installation through physical presence at the Company's shop or via electronic submission, the data collected include the following: owner's name, full name, occupation, Tax identification number/Tax Office, contact numbers, e-mail address of engineer - supervisor, street, street number, municipality, postal code, property description (house, apartment building, etc.), number of meters, building volume (m³), installed capacity, Building Permit number.

V. In case of submissions concerning connectivity and network existence permissions by:

- Physical presence to the Company's Shop
- E-mail

The data collected include: name, surname, contact number, address Tax identification number/Tax Office

VI. In case of submissions of a complaint / request by:

- Physical presence to the Company's Shop
- E-mail
- Visiting the Company's website, completing and submitting the relevant contact form,
- Call Center of the Customer Support
- Network Distribution users

The data collected include: name, surname, company (optional field), status, street, number, municipality, postal code, contact telephone number, e-mail address and any other data necessary for their management, depending on the subject matter of their content.

B. In relation to the Company's employees, the data collected include, indicatively and not restrictively:

Curriculum Vitae, Copy of Degree, Copy of Identity Card, Tax Identification Number, Tax Office, Social Security Number, Insured member's registration number, IBAN, Certificates of studies and certifications of seminars/trainings, family status information such as civil status information (marriage, birth of children), medical data, contact details etc.

In addition, there are cases of indirect identification through the collection of electronic identification data (e.g. login details, access rights, IP address, electronic identifiers/cookies). In case of registration or login to enaon website using a third-party unique registration service that authenticates your identity and links your social media login information (e.g. LinkedIn) to enaon, we collect any information or content required for the registration or login, of which you have granted the permission for, to the provider of the social media service with your login details. The collection of other data may depend on the privacy settings applied with your social media provider, so please review the privacy statement or policy of the relevant service.

The collection of this data allows us to personalize your online experience as a user of our website regardless of the use of different devices, to improve the performance, usability, and effectiveness of the enaon's online presence and to evaluate the effectiveness of the marketing activities of our services.

4 Why do we process your personal data?

Your personal data, in accordance with the Data Protection General Regulation, are collected and processed for one or more of the following purposes:

- i. For the performance of a contract:** the processing of your personal data is necessary for the fulfilment of our obligations under the contract.
- ii. To comply with legal obligation:** the processing of your personal data is mandatory, regarding cases of record keeping for tax purposes or providing your personal data to public bodies or law enforcement authorities.
- iii. For the protection of legitimate interests:** the processing of your personal data may occur during the fulfillment of a lawful activity so that we can ensure the continuity of that activity, provided that it does not override your interests.
- iv. Because you have given your consent:** the processing of your personal data will only be done with your permission if you agree to it. In any case, however, you may withdraw your consent at any time by submitting your request in writing and following the appropriate channels of communication with the Company.

More specifically, when we process your personal data, we rely on one of the following processing situations:

- i. Conclusion and operation of contracts
- ii. Provision of after-sales services
- iii. Management of clients/third party requests/complaints
- iv. Management of Subsidies
- v. Technical services such as study and construction of supply as well as the activation of the connection
- vi. Finding and service provision to potential customers
- vii. Promotion of services to attract new customers.
- viii. Improvement of services provided through customer satisfaction surveys.
- ix. Compliance of the Company with regulatory obligations to control and inspect network construction.
- x. Correct billing services and management of arrears
- xi. Network construction inspections
- xii. Compliance with energy distributor obligations as defined in the relevant legal framework.
- xiii. Metering of delivery points
- xiv. Conclusion, operation, and termination of employment contracts
- xv. Payroll payment of the Company's personnel
- xvi. Management of benefits granted.

5 Who are the recipients of your personal data?

Enaon does not transfer personal data to third parties that are not affiliated with the Company, unless this is required for legal professional and business needs of the Company, for the Company to respond to your requests and/or as required or permitted by the law or professional standards. Recipients may include the following:

- Any relevant Division of the Company for service purposes of any request.
- The Holding Greek Company and other companies of Italgas Group for purposes concerning support and/or performance of all business functions.
- The Company's contracted partners such as the network of authorized partners, contractors, engineers, safety engineers, employees of temporary employment companies to whom we disclose only personal data that allow them to perform actions assigned to them, such as updating the status/stage of a natural gas contract connection request or technical support for it, as well as collection companies for the purpose of informing debtors of overdue receivables.
- The relevant Ministry in cases of subsidies.
- The Distribution Network Users who represent your property of interest and are also considered Processors for the supply of natural gas to final consumers.
- All public authorities (Tax Offices, National Social security institution, General Commercial Register, etc.) to which personal data are transmitted by the Company as a legal obligation.
- Courts, judicial authorities, bailiffs, law enforcement authorities or independent/regulatory authorities in the context of the investigation of specific cases and at their request. (e.g. RAEWW, Hellenic Data Protection Authority)
- Banks in the context of providing general banking services but also in the context of e-banking, related to the payroll of enaon employees.
- Insurance companies that provide group insurance plans to company employees including the occupational physician.
- Leasing companies for the Company's employees (company car), under corporate benefits
- Any form of audit (e.g., tax, internal or other) that requires disclosure of personal data.

6 How long do we keep your personal information?

Enaon makes every effort to keep the personal data collected by you, either in hardcopy either in electronic form, only for the period for which these data are necessary and exclusively for the purposes for which they are collected or until their deletion is requested by the data subject, unless there is a clear provision to the contrary applicable legislation.

7 How do we protect your data?

Enaon takes appropriate organizational and technical measures to protect your personal data from any loss, alteration, unlawful destruction, prohibited dissemination or access and from any other form of unlawful processing. Indicative (and not restrictive) measures include the following:

- Appointment of Data Protection Officer (DPO)
- Preparation and implementation of Policies/Procedures
- Implementation of mechanisms to protect cases against the leakage of sensitive data.
- Logging and access management
- Encryption, where required.
- Continuous employee training and awareness

8 Rights to protect your data

You can exercise your rights below in person at the Company's offices. Alternatively, you can send an e-mail to the following address dpo.gdpr@ena-on.gr accompanied by a copy of an official certificate of identity (e.g. identity card, passport).

The rights of data subjects are as follows:

- information:** to receive any information about your processing in a concise, understandable, and easily accessible form.
- access:** to find out which of your data are processed, the reason of process and their recipients.
- rectification:** to correct any incomplete or inaccurate data we hold about you
- deletion** [also known as the “right to be forgotten”]: to delete them from our records, only if their processing is no longer necessary.

- v. **restriction of processing:** in case of questioning the accuracy of the data, etc.
- vi. **portability:** to receive your data in a structured and commonly used format.
- vii. **withdrawal of consent/objection:** regarding the processing of your personal data, at any time
- viii. **not be subjected to a decision made solely on the basis of automated processing,** including profiling.

9 Right to submit a complaint

If you wish to submit any report/complaint about possible incidents of personal data security, this is done either by physical presence at the Company's offices, or by sending a documented e-mail message to the following address dpo.gdpr@ena-on.gr. You also have the right to submit a complaint to the Personal Data Protection Authority. On the relevant website you will find information about the method of complaints submissions (<http://www.dpa.gr/>).

10 Communication

If you have any questions or comments about this statement, please contact us at dpo.gdpr@ena-on.gr

11 Changes to this Statement

Enaon may periodically modify this Statement to reflect the most recent privacy practices. If changes are needed, we will record the date of modification or revision at the top of this page. We recommend, however, that you periodically review this Statement to stay informed of how we manage your personal data.