

## PRIVACY POLICY

### INTRODUCTION

We would like to assure you that for the company with the corporate name “Enaon EDA HELLENIC GAS DISTRIBUTION COMPANY Single Member S.A.”, trading as “Enaon EDA”, whose registered offices are in Athens at junction of 109-111 Mesogeion Ave. & Roussou St., GR-11526, Tax ID No. 997104868/ Tax Procedures and Service Center (KE.FO.DE.) of Attica , as duly represented, it is of primary importance to protect the personal data of natural persons who interact in any manner with the company. That’s why we take suitable measures to protect the personal data belonging to those persons that we process and to ensure that personal data is always processed in accordance with the obligations laid down in the legal framework, both by the company itself and by third parties who process personal data on our behalf. Enaon EDA, therefore, implements suitable technical and organisational measures to securely process personal data and prevent random loss or destruction and unauthorised and/or illegal access to, use, modification or disclosure of such data.

Enaon EDA attaches utmost importance to the privacy and security of Users and Visitors to our website, as well as End Customers and External Partners. Enaon EDA is committed to protecting the Personal Data you share with it. This Privacy Policy sets out the ways in which Enaon EDA processes information that can be used to directly or indirectly identify an individual ("Personal Data") collected through the use of Enaon EDA's website and platform.

Enaon EDA’s website is in compliance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR")), which is a directly applicable legislative act.

The terms of this policy apply to:

**"Users" or "Visitors"**, i.e. persons who visit our website <https://www.ena-on.com/>

**"End Customers" or "Customers"** i.e. persons who enter into contract with Enaon EDA for their connection to the Gas Distribution Network, potential and former Customers,

**"External partners"** of Enaon EDA, i.e. contractors, engineers, combustion equipment installers, etc., as well as prospective employees in the context of applying for a job through our website.

Any processing of Personal Data by Enaon EDA is done in such a way as to safeguard its confidentiality. All information is stored securely and only authorised personnel are allowed access to it. Enaon EDA develops and implements the necessary technical and organisational measures to safeguard the Personal Data of Users/Visitors, End Customers, as well as External Partners (all of whom should be understood as "Data Subjects") from unauthorised or unlawful processing and use, as well as against possible loss, destruction, damage, theft or unauthorised access.

## DEFINITIONS

**General Data Protection Regulation (GDPR):** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

**Business Activity:** Enaon EDA's mission is to develop natural gas networks, ensuring the distribution of gas within areas the license relates to, as defined in the Gas Distribution Licences and Gas Distribution Network Management Licences which have been granted, as provided for in the legislation in force. In particular, the above activities include the construction, maintenance, operation, management and exploitation of the Natural Gas Distribution Network in general. In its operations, the company respects the legal and regulatory framework, ensures its own Operational Independence, and discharges all its obligations in full. Its obligations include ensuring the reliability of the network, maintaining a technically sound and efficient network and complying with the technical specifications and requirements of operation and maintenance planning, thus achieving high performance targets for its distribution activities.

**Personal Data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special categories of (sensitive) Personal Data or Personal Data:** Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. They also include Data relating to criminal convictions and offences.

**Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Controller:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Processor:** The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Third party:** Any natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**Consent of the Data Subject:** Any freely given, specific, informed and unambiguous indication of consent, by which the Data Subject expresses his or her agreement, by declaration or clear affirmative action, to the processing of Personal Data concerning him or her.

**Personal Data Breach:** A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access of Personal Data transmitted, stored or otherwise processed.

## WHAT IS THE LEGAL BASIS FOR USING YOUR PERSONAL DATA?

Enaon EDA collects only those personal data that are necessary in order to meet your requests. Whenever additional, optional information is sought, you will be informed of this at the time of collection and your prior consent to such processing may be required.

The current legal framework allows us to process personal data only if we have a legitimate basis for doing so. We are also required to notify you of the reasons for such processing. Therefore, when we process your personal data, we rely on one of the following bases:

**Consent:** In specific circumstances we may ask for your consent in order to process some of your personal data. Your data will only be processed in this way if you expressly agree to this (Article 6(1)(a) of the GDPR).

**Contract performance:** If we need to process your personal data to fulfil our obligations arising from a contract concluded between us (Article 6(1)(b) of the GDPR).

**Legal obligation:** This is used if we need to process your personal data to comply with a legal obligation, such as, but not limited to: a) to retain records for tax purposes, b) to provide information to a public body, c) to comply with the requirements of a legislative or regulatory provision or a judgment (Article 6(1)(c) of the GDPR).

**Protecting your vital interests:** This is used if we need to process your personal data to protect your vital interests (Article 6(1)(d) of the GDPR).

**Performance of a task carried out in the public interest or in the exercise of official authority:** This is used if we need to process personal data for the performance of a task carried out in the public interest (Article 6(1)(e) of the GDPR).

**Legitimate interest:** We may process your personal data in cases if such processing is in the legitimate interests pursued by our company in the performance of a lawful activity, in order to ensure the continuity of that activity. This processing will, of course, not override your interests, freedoms and fundamental rights (Article 6(1)(f) of the GDPR).

Enaon EDA collects Special Categories of Personal Data, as defined in Article 9 of the GDPR, when the individuals themselves, without being requested by us to do so, provide us with such data, or when the data is required by law, or the collection of such data is permitted by law.

The concept of "Special Categories of Personal Data" includes Personal Data concerning a person's race, nationality, political opinions, trade union membership, religious beliefs, philosophical beliefs, physical or mental health, sexual life and orientation, as well as data relating to criminal convictions and offences.

## WHERE IS THE PERSONAL DATA WE PROCESS COLLECTED FROM?

Enaon EDA collects the personal data of Data Subjects through the Customer Service Call Centre, the Emergency Call Centre, the Customer Service Offices, the Distribution Users, as well as through our website.

The sections below cover the Data Subjects whose personal data are collected.

Enaon EDA may collect and process personal data about Website Visitors, Customers, Prospective Employees, Suppliers, Engineers, Contractors and Combustion Equipment Installers.

Where required by the applicable legal framework, we will request your explicit consent to process your personal data collected by Enaon EDA.

Please note that any consent is completely optional. However, if you do not provide the consent required for us to process your Personal Data, whenever we ask for it, it may not be possible for you to use those services.

## WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES?

Enaon EDA uses the following Data for the following purposes:

i) **For Website Visitors**, personal data is provided in the context of communication using the contact form, to facilitate your request for a new connection, to inform you about offers and news from Enaon EDA, to improve the website, and to adjust the way visitors navigate the site. Consequently, in order to provide that data the Website Visitor grants his/her consent when entering them. Failure to provide such data will affect the outcome of his/her requests and/or make such requests impossible to satisfy. It will also not be possible to inform him/her about offers and news from Enaon EDA. Please see our Cookies Policy in relation to how data is used to improve the website and to adapt how visitors can navigate the site. To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, landline or mobile phone number, IP address, email address and delivery point identification code.

The website also has a special field Website Visitors can tick to expressly consent to receiving our newsletter.

If you choose not to give your consent for the above processing purpose, we will not send you newsletters. We would also like to inform you that you can withdraw your consent at any time at no cost.

ii) **For Prospective Customers**, personal data is provided in the context of expressing interest in concluding a Natural Gas Network Connection Agreement. Therefore, the legal basis for the provision of such Data is execution of the contract. Failure to provide such data will affect when the Connection Agreement can be signed or may even make it impossible to sign the Agreement. To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, home address, ID card number, tax ID number, tax office, bank account number, landline phone number, mobile phone number, email address. The above Data are processed by Enaon EDA for the following activities:

- Registering an expression of interest and receiving connection requests,

- Scheduling a technical visit/on-site inspection appointment to conduct an on-site inspection,
- Carrying out a technical visit/on-site inspection appointment to conduct an on-site inspection,
- Preparing a Connection Offer for a Prospective Customer,
- Receiving and checking additional documents and Customer Acquisition - Contract Signing,
- Application for Priority,
- Customer Acquisition - Contract Signing,
- Signing the Connection Agreement for Customer Acquisition - Contract Signing.

Please note that if we receive documents relating to extension and priority requests, which contain Sensitive Personal Data, your explicit consent is required for us to process these Special Categories of Data (Sensitive Data).

If you choose not to give your consent, we may not be able to accede to your requests or carry out some of the tasks that need to be carried out to offer you the said services. We would also like to inform you that you can withdraw your consent at any time at no cost.

In addition, please note that we only process your above Personal Data with your consent for the purpose of informing you about our connection fee offers. You can withdraw your consent at any time and without any financial charge. If your consent is not provided, your data will not be processed for this reason and your request will not be granted.

In addition, Enaon EDA may process Personal Data from the recordings made by closed circuit television (CCTV) systems installed outside the company's headquarters and Customer Service Offices. Such processing is done because Enaon EDA has a legitimate interest in monitoring the security of its building facilities.

ii) **Customers** are contractually obliged to provide personal data when entering into a Natural Gas Network Connection Agreement. Failure to provide such data will affect proper execution of the Connection Agreement or will make it impossible to execute the Agreement. To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, home address, ID card number, tax ID number, tax office, delivery point identification code, bank account number, landline phone number, mobile phone number, email address. The above Data are processed by Enaon EDA for the following activities:

- Receiving and managing customer complaints,
- Managing indoor installations (e.g. inspection of indoor installations, indoor installation studies, technical reports, scheduling of visits for inspections, meter activation, notification of the Customer by letter regarding the licensing procedure),
- Network Connection Construction Works (e.g. construction studies and agreeing a schedule with the contractor, informing the customer and scheduling the visit, third party inspections, sharing data with Technical Security Advisor, receiving complaints that need to be handled),
- Network Management tasks (e.g. collecting-recording data at the time of the task),
- Amounts collected from final consumers (only for connection charges),
- Conversion of outdoor gas installation.

In addition, Enaon EDA must provide personal data to comply with its legal obligations under the legislative and regulatory framework governing it (the Natural Gas Distribution Network Management Code) and in relation to judicial and other public authorities and services for the following activities:

- Managing Distribution Users' requests on behalf of Customers in order to process them and provide the relevant information, such as requests for Representation, Supply, Succession, Interruption in Supply, Disconnection, Meter Reactivation, Reconnection of Supply, Data Modification, Meter readings, Termination of Representation and Change of Supplier,
  - Recording an incident reported to the Emergency Call Centre,
  - Creating Assignment Orders and handling emergencies,
  - Emergency tasks (e.g. assignment orders, assignment of tasks, monitoring of work plan and scheduling of network and facility maintenance tasks),
  - Meter calibrations and "proper working order" checks,
  - Managing Distribution Users' Requests and managing Billing for ancillary services,
  - Managing Delivery Point Metering Data,
  - Managing Indoor Installations (e.g. sampling of indoor installations to verify the existence of a leakage test certificate),
  - Communicating with the competent Regulatory Authority, Public Authorities and Bodies,
- Enaon EDA may process Personal Data when such processing is "necessary for the purposes of the legitimate interests pursued by it or except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data".

The following cases constitute a non-exhaustive list of the legitimate interests pursued when processing Customer Personal Data so that the corporate objectives can be successfully achieved:

- Recording on closed circuit television (CCTV) cameras installed outside the company's headquarters and Customer Service Offices. Such processing is in Enaon EDA's legitimate interest because it allows it to monitor the security of its building facilities
- Network Management tasks (e.g. recording information about gas theft). Such processing is in Enaon EDA's legitimate interest because it allows it to defend itself and ensure the quality of the services provided by Enaon EDA, as well as to assert Enaon EDA's legal claims.
- Exporting customer credit balance reports (connection fees). Such processing is in Enaon EDA's legitimate interest because it allows it to defend and protect its interests.
- Quality, Health & Safety checks and Compliance with Technical Regulations. Such processing is in Enaon EDA's legitimate interest because it allows it to defend and safeguard the services provided by Enaon EDA.
- Checking/evaluating compliance with the regulatory framework for construction works. Such processing is in Enaon EDA's legitimate interest because it allows it to defend and safeguard the services provided by Enaon EDA.
- Contacting Distribution Users and End Customers to exchange information with Distribution User Representatives for customer service/problem solving relating to metering issues. Such processing is in Enaon EDA's legitimate interest because it allows it to defend and safeguard the services provided by Enaon EDA.

iii) **For Prospective Employees** Personal Data must be provided to assess prospective employees and to enable the recruitment process to take place. This processing is based on contract execution and is done to ensure optimal staffing for Enaon EDA. To achieve that purpose, Enaon EDA, as Controller, processes your personal data such as: your name-surname, landline or mobile phone number, email address, CV, any documents accompanying the CV (e.g. qualifications).

iv) **For suppliers**, there is a contractual obligation to provide personal data so suppliers who provide services/goods can be paid and supplier contracts can be managed; failure to provide

such data will affect proper implementation of the contract. To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, home address, ID card number, tax ID number, tax office, bank account number, landline phone number, mobile phone number, email address.

Enaon EDA may process Personal Data when such processing is "necessary for the purposes of the legitimate interests pursued by it or except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data".

The following cases constitute a non-exhaustive list of the legitimate interests pursued when processing of Supplier Personal Data so that the corporate objectives can be successfully achieved:

- Carrying out checks during tender procedures. Such processing is in Enaon EDA's legitimate interest because it allows it to check whether the tender procedure is in order to safeguard its legal rights.
- Identifying suppliers, receiving offers, evaluating suppliers for the signing of a contract (for sole proprietorships). Such processing is in Enaon EDA's legitimate interest because it allows it to confirm the Supplier's competence, to ensure the quality of the services and/or goods provided by the Supplier, as well as to defend and protect its interests.

To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, home address, ID card number, tax ID number, tax office, bank account number, landline phone number, mobile phone number, email address.

**v) For Gas Engineers, Designers, Technicians and Combustion Equipment Installers**, there is a contractual obligation to provide personal data in the context of carrying out work orders under the Gas Network Connection Agreement; failure to provide it will affect the proper execution of the Connection Agreement. To achieve those purposes, Enaon EDA, as Controller, processes your personal data such as: your name-surname, home address, ID card number, tax ID number, tax office, bank account number, landline phone number, mobile phone number, email address. The above Data are processed by Enaon EDA for the following activities:

- Network management tasks,
- Starting construction works,
- Checking that meters are working properly,
- Managing indoor installations (e.g. scheduling visits to carry out on-site inspections, scheduling visits to activate meters, submission and approval of indoor installation design, submission of technical report).
- Network connection construction works (e.g. calculation and approval of construction costs).

In addition, Enaon EDA must provide personal data to comply with its legal obligations under the legislative and regulatory framework governing it (the Natural Gas Distribution Network Management Code) and in relation to judicial and other public authorities and services for the following activities:

- Emergency works,
- Managing indoor installations (e.g. inspection of new buildings indoor installation design).

Enaon EDA may process Personal Data when such processing is "necessary for the purposes of the legitimate interests pursued by it or except where such interests are overridden by the

interests or fundamental rights and freedoms of the data subject which require protection of personal data”.

The following cases constitute a non-exhaustive list of the legitimate interests pursued when processing of Personal Data so that the corporate objectives can be successfully achieved:

- Checking/evaluating compliance with the regulatory framework for construction works. Such processing is in Enaon EDA's legitimate interest because it allows it to defend itself and safeguard the quality of the services provided by Enaon EDA.
- Obtaining subcontractor data. Such processing is in Enaon EDA's legitimate interest because it allows it to defend itself and safeguard the quality of the services provided by Enaon EDA.

## USE OF THE WEBSITE

By visiting the Enaon EDA website, you consent to your personal data being collected and used in the manner outlined in this Policy.

If you do not agree with the terms set out herein, please do not continue to browse our website.

Enaon EDA may collect, record and process the data of visitors to its website. We may record your IP address and use cookies.

Enaon EDA can add information collected via page view activity. In addition, Enaon EDA may collect and process any personal data you voluntarily provide us with on our website forms, such as when you register for information and newsletters.

## IP ADDRESSES

An Internet Protocol (IP) address is a unique number used by devices to identify and communicate with each other on a network of computers using the Internet Protocol Standard. In other words, the IP address is a number assigned to your computer each time you access the internet. It allows computers and servers to identify and communicate with each other. The IP addresses from which visitors appear to come may be recorded for information technology security and system diagnostics purposes. This data may also be used in aggregate form to analyse website trends and performance.

## LINKS TO OTHER LOCATIONS

Please bear in mind that when you visit our website, you can follow links to other websites which are outside our sphere of influence. Enaon EDA is not responsible for the content or privacy policy of those websites.

## COLLECTING THE DATA OF USERS PARTICIPATING IN SURVEYS

Surveys used to collect user-generated data are made available to businesses, organisations and individuals. Enaon EDA is responsible for ensuring that data is collected and processed in accordance with the applicable legislation. Enaon EDA will not process personal data for purposes other than those stated or using other means that go beyond the instructions given by website Users.

Surveys or questionnaires relate to individuals whose data has been uploaded, transferred or input manually by the Enaon EDA User to their account to improve services to the User. Personal data may include personal contact details such as name, home address, landline or mobile phone number, email address, information about the family, lifestyle and social circumstances such as age, date of birth, marital status, number of children, qualifications, business contact details, sex, religion, race, health details and other sensitive personal data.

**Special note concerning minors:** Minors aged under 15 are prohibited from disclosing their personal data to Enaon EDA via its website without the prior consent of their guardian. We ask that those persons not submit information to us. Where website users fall into this category and continue to disclose their personal data to us via our website, Enaon EDA will assume that those persons have obtained the prior consent of their guardian.

## WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

Enaon EDA 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 companies of both Enaon EDA and Italgas Group for purposes concerning support and/or performance of all business functions.
- The Company's contracted partners such as the network of authorised 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 Ministries/Local Authorities/European Commission offices in cases of public subsidies.
- The Distribution Network Users who represent your property of interest and are also considered Controllers for the supply of natural gas to final consumers.
- All public authorities (Tax Offices, EFKA (Social Security) Fund, General Commercial Register, Hellenic Manpower Employment Agency, etc.) to which the Company is legally obliged to transmit personal data.
- Courts, judicial authorities, court process servers, law enforcement authorities or independent/regulatory authorities in the context of the investigation of specific cases and at their request (e.g. Regulatory Authority for Waste, Energy and Water / 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 EDA employees and suppliers.

- 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.

## PERSONAL DATA COLLECTION AND PROCESSING LOCATION

The personal data of individuals collected by Enaon EDA are collected, stored and processed at the company's registered offices in Athens at the junction of 109-111 Mesogion Ave. & Roussou St. GR-11526, and at Menemeni in Thessaloniki at the junction of 256 Monastiriou St. & 7 D. Glynou St., at the Customer Service Offices (CSOs) operated by the company throughout Greece, as well as to the Microsoft Azure IT Hosting Services provider, to whose servers Data collected by Enaon EDA and the MyPortal registration platform are transmitted, only for storage purposes. In addition, platforms are used by newsletter service providers.

## HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Enaon EDA will not retain Data for a period longer than that required to achieve the purposes for which it was collected or in accordance with the legislative framework in force from time to time. User Data will be retained for at least 5 years after the end of the legal relationship between Enaon EDA and End Customers. In certain cases, specific personal information may be retained beyond that time period due to possible legal obligations, Enaon EDA's legitimate interests, etc. Such cases include those relating to each branch of law (tax, civil, criminal law, etc.) and for reasons of security and safety of the natural gas distribution network.

## ACCEPTANCE OF THESE TERMS

We assume that all visitors to the Enaon EDA website have carefully read this privacy policy and agree with its content. If someone does not agree with this privacy policy, they should not use our website and platform. Enaon EDA reserves the right to amend the privacy policy as it sees fit.

## WHAT ARE YOUR DATA PROTECTION RIGHTS?

The new GDPR grants you the following rights in relation to the processing of your personal data:

**Right of Access:** You can request access to your personal data. This allows you to obtain a copy of your personal data held by Enaon EDA.

**Right of rectification:** You can request that your personal data be corrected. This allows you to correct any incomplete or inaccurate Data held by Enaon EDA. In that case we will need to verify the accuracy of the new Data you provide to us.

**Right of erasure:** You can request that your personal data be deleted. This allows you to request that we delete or remove personal data where there is no reason to continue processing it. Note, however, that it may not be possible to exercise this right in specific cases for specific legal reasons which will be notified to you, as appropriate, at the time your request is submitted.

**Right to restrict processing:** You can request a restriction on the processing of your personal data. In particular, you can ask us to stop processing your personal data in the following cases:

- (a) if you want us to redefine the accuracy of your personal data;
- (b) when you consider that your Data is being used abusively but you do not want us to delete your Data;
- (c) when we need to retain your Data, even if we no longer need it, so that you can use it should you exercise your rights.

**Right to object:** You can object to the processing of your personal data at any time in cases where processing of your data is based on performance of a duty carried out in the public interest or in the exercise of official authority (Article 6(1)(e) of the GDPR) or if processing serves the legitimate interests of Enaon EDA or a third party (Article 6(1)(f) of the GDPR). However, Enaon EDA may not satisfy your right where it demonstrates compelling and legitimate grounds for processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Right of portability:** You can request that your personal data be transferred to you or third parties. We will provide you or the third party you have chosen with your Personal Data in a commonly used and machine-readable format. Note that this right only applies to automated information which you initially gave us your consent to use or whenever we used that information to perform a contract with you.

**Right to withdraw consent:** You can withdraw your consent at any time in cases where you have already provided consent for your personal data to be processed. However, this will not affect the legality of any processing which took place before your consent was withdrawn. If you withdraw your consent, Enaon EDA may not be able to offer you certain products or services. You will be informed about this at the time your request is submitted.

**Non-automated decision-making:** Automated decision-making occurs when an electronic system uses personal data to take a decision without human intervention. In that case you are entitled not to be subject to decisions taken exclusively via automated processing, including profiling, which generates legal effects relating to you or which significantly affect you in a similar manner, unless you provide us with your consent or it is necessary to enter into or implement a contract between you or if otherwise permitted by law. You also have the right to contest decisions taken about you in this way.

To exercise your rights you can:

- send an email to the email address [dpo.gdpr@ena-on.gr](mailto:dpo.gdpr@ena-on.gr), accompanied by a copy of your official identification documents (e.g. ID Card, passport)
- or alternatively
- send a registered letter marked 'CONFIDENTIAL' to: DPO at Enaon EDA, junction of 109-111 Mesogion Ave. & Roussou St., GR-11526

Enaon EDA will respond to your request free of charge without delay and in all events within one month from receiving the request, save in exceptional cases, in which case the said

deadline may be extended by another two months, where necessary, taking into account the complexity of the request and/or the total number of requests we have received. Enaon EDA will inform you about any extension within one month from receiving the request and the reasons for the delay. If it is not possible to satisfy your request, Enaon EDA will inform you without delay, and at the latest within one month from receiving the request, about the relevant reasons and your ability to submit a complaint to the Hellenic Data Protection Authority, and about your right to seek recourse to the competent judicial authorities.

If Enaon EDA considers your request to be manifestly unfounded or excessive, it may require payment of a reasonable and proportionate fee, taking into account the administrative expenses required to satisfy it or may refuse to act on your request.

Moreover, we would inform you that you are entitled to submit a complaint to the competent Hellenic Data Protection Authority if you consider that your rights have been affected by Enaon EDA's processing of your personal data.

## **LEGAL OBLIGATION TO DISCLOSE PERSONAL INFORMATION**

We may disclose User's Personal Data without their prior consent only when we have reason to believe that disclosure of that Data is required to verify identity, to communicate with or commence court proceedings against a person or persons suspected of infringing or endangering the assets belonging to Enaon EDA or to other persons who could be harmed by the activities of those Users or by persons who could (deliberately or otherwise) commit similar acts. It is clear that disclosure will be made in accordance with the criteria and conditions laid down by law.

## **ACCESS TO AND UPDATING OF YOUR PERSONAL INFORMATION**

Enaon EDA will provide you with access to your Personal Data and if that Data is erroneous, we will provide you with ways to update and/or delete your Data quickly. Where Enaon EDA must retain some or all of that information for its lawful business purposes or if it has a legal obligation to do so, that information will not be deleted for such time as it serves that purpose.

Our goal is to provide you with our services in a way that protects your Data from accidental or malicious destruction.

## **HOW DO WE PROTECT YOUR PERSONAL DATA?**

The personal data processing procedure is conducted in a manner which ensures its confidentiality. More specifically, it is carried out solely and exclusively by staff authorised for that purpose, and all suitable organisational and technical measures are taken to safeguard the Data and protect it from accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and all other forms of unlawful processing.

### **Confidentiality**

All staff are subject to the duty of confidentiality. All Personal Data Processors on behalf of Enaon EDA and the processing subcontractors are obliged to sign a confidentiality / GDPR compliance agreement.

When authorised staff have access to Personal Data, such access is only possible via an encrypted connection. When accessing the Data in a database, the IP address of the person who has access to the Data must also be authorised.

Devices on which Personal Data is temporarily stored are always locked in a secure location, apart from cases where such data is not used or transferred. Personal data is never stored on mobile media such as USB sticks, CDs and DVDs.

### **Integrity**

To ensure integrity, all data transfers are encrypted to bring them into line with best practices to protect the confidentiality and integrity of data. Information is sent encrypted using the appropriate security measures (Secure Socket Layer) and then encrypted in the database maintained by Enaon EDA to be accessible to those who have authorised access to such systems and who are obliged to keep such information confidential.

### **Availability**

IT systems have been designed to offer the high availability of services provided by Enaon EDA to Subjects. High availability (HA) is a feature of a system which seeks to ensure a high level of business performance. Availability refers to the ability of the user community to obtain a service or good quality access to the system, either to submit new data, update or change existing variables, or to collect the results of previous steps they have taken.

### **Transparency**

Enaon EDA will inform you at all times about changes to its privacy and security protection procedures, including company practices and policies. You can request information at any time about where and how your Data is stored, how it is secured, and how it is used.

### **Possibility of intervention**

Enaon EDA grants rights of access, rectification, deletion, objection and a right to file a complaint.

Overall responsibility for data security lies with the Enaon EDA Data Protection Officer (DPO) who trains and briefs all company staff about the data security measures referred to in this Privacy Policy.

### **Classification**

Access to personal data is precluded by default using a zero-benefit policy. Access to personal data is limited to authorised staff. The Enaon EDA Data Security and Privacy Officer issues authorisations and keeps a register of authorisations granted.

### **Monitoring**

Enaon EDA uses security reports to monitor access standards and to identify and limit potential threats. Administrative functions, including access to the system, are recorded to provide the necessary audit trail to record unauthorised or random changes.

System performance and availability are monitored by both internal and external monitoring services.

### **Personal data breach notices**



Where your Data is breached, Enaon EDA will notify you and the competent supervisory authority within 72 hours and will provide you with information by email or other appropriate means about the extent of the breach and the Data affected. Moreover, it is clear that it will take any steps needed to limit any harmful consequences for the persons the Data relates to.

### **CHANGES TO THIS PRIVACY POLICY**

We strive to review and constantly update this Privacy Policy in order to comply with legislative and regulatory requirements, while providing the best possible protection for your Personal Data. Any updates will be notified via the current website.

### **Enaon EDA Data Protection Officer (DPO)**

Enaon EDA has a Data Protection Officer who is responsible for issues relating to the protection of the privacy of persons and the safe and proper processing of personal data. If you would like to receive more information or clarifications about the data collected by Enaon EDA or how it processes it, please send an email to: [dpo.gdpr@ena-on.gr](mailto:dpo.gdpr@ena-on.gr) (Personal Data Protection/DPO).

Athens, 4 November 2024

THE CHIEF EXECUTIVE OFFICER

Francesca Zanninotti