

## **Enaon-STC-014 Annex 02-R05**

### **Information notice on personal data processing Update of 29/04/2026**

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION 2016/679

Pursuant to EU Regulation 2016/679 (hereinafter the “GDPR”), each Greek company of the Italgas Group (hereinafter the “Company” or the “Data Controller”) hereby informs you that your personal data it collects through the whistleblowing channels made available by the Data Controller will be processed in compliance with the GDPR, the Greek Law 4624/2019, as well as with the provisions issued by the National Data Protection Authority as applicable over time. As a reporting party, you are personally liable for any defamatory content of your communications and the Data Controller reserves the right not to consider any reports made in clear “bad faith” with intent or gross negligence. The Data Controller also reports that the data supplied by means of the specific whistleblowing channels must be pertinent to the purpose of the report; the Data Controller reserves the right not to follow up on any reports relating to conduct or parties outside the obligations deriving from Greek Law 4990/2022 and/or the Code of Ethics and the Internal Control System.

#### **1) Types of personal data**

The Company mainly processes the following categories of personal data:

- identification and contact details (such as, by way of example, name, surname, date of birth, tax code, address, telephone numbers, residence, domicile).

Furthermore, in relation to the content of the Report, it may happen that the Company processes particular categories of data pursuant to art. 9 GDPR and pursuant to art. 10 GDPR.

#### **2) Purpose of the processing and legal basis for the processing. Legitimate interests pursued.**

The processing of the personal data you have supplied through the Report in relation to the Reporting party and any third parties as may be involved will be processed only for purposes connected:

- a) with the application of the Compliance Standard “Anonymous and Non-Anonymous reports”, with compliance with Greek Laws 4990/2022 and 4808/2021 and/or the Code of Ethics (fulfilment of legal obligations) and the Internal Control System of the Data Controller. Processing of data for these purposes does not require your consent insofar as it is necessary in order to fulfil the legal obligations incumbent upon the Data Controller, in accordance with Articles 6, subsection 1, letter c) and 9, subsection 2, letter b) of the GDPR;
- b) with the protection of a right in a court of law. Processing of data these purposes does not require your consent insofar as it is necessary in order to fulfil the legal obligations incumbent upon the Data Controller, in accordance with Articles 6, subsection 1, letter

F) and 9, subsection 2, letter F) of the GDPR.

### **3) Data conferral. Consequences in the event of non-conferral**

Having acknowledged the legitimacy of reports, whether anonymous or not, the conferral of data is optional; refusal to confer data shall have no consequences in terms of the validity of the Data Controller's action.

### **4) Method of processing and data storage period**

The personal data processed following a report will be used, and thereafter stored, on both electronic storage devices and paper. The data will be stored by the Data Controller for a period of time equal to the statute barred time of the rights that can be exercised by the Data Controller, as applicable over time.

### **5) Disclosure, dissemination and transfer of data**

The personal data of the Data Subjects will not be disseminated and may be disclosed (i) to corporate bodies; (ii) to advisors (e.g. law firms) and (iii) to public authorities and/or institutions, legal authorities, police forces and investigation agencies. For the purpose of managing the report, the data may be transferred to the Parent Company Italgas S.p.A.

### **6) Rights of the data subject**

The data subject may, in relation to the data processing described herein, exercise the rights laid down in the Regulation (articles 15-21), including:

- receive confirmation of the existence of their personal data and access its content (right to access);
- update, amend and/or correct their personal data (right to rectification);
- ask for it to be deleted or to restrict the processing of data processed in breach of the law including that which need not be retained in relation to the purposes for which the data was collected or otherwise processed (the right to be forgotten and the right to restriction);
- object to the processing (right to object);
- withdraw consent, where given, without detriment to the lawfulness of the processing based on the consent given prior to withdrawal;
- lodge a complaint with the Supervisory Authority in the event of a breach of personal data protection regulations;
- receive electronic format copies of the data concerning them provided in the context of the selection process (e.g. data relating to previous work experiences) and ask for this data to be sent to another data controller (right to data portability).

To exercise these rights, you may contact the Data Protection Officer (in abbreviated form, "DPO") by sending an e-mail to the following e-mail address [dpo.gdpr@ena-on.gr](mailto:dpo.gdpr@ena-on.gr)

### **7) Identity and contact details of the Data Controller, Data Processors and contact details of the Data Protection Officer**

The Data Controller is the Greek company to which your report relates:

- o Enaon: 109-111, Mesogeion Avenue, 11526, Athens, Greece
- o Enaon EDA: 109-111 Mesogeion Ave., 11526, Athens, Greece,

The Company may transfer personal data to third-party service providers who act on its behalf and in accordance with its instructions, as Data Processors, solely for the purposes of operating, hosting, and providing technical support for the Whistleblowing channel. These providers may include categories such as the provider of the electronic reporting channel, the provider of data hosting services within the European Economic Area and, where required, providers of technical support or information security services. Data Processors and any sub-processors are bound by contracts in accordance with Article 28 of the GDPR, implement appropriate technical and organizational security measures, and are subject to control by the

Company, as the Data Controller. The contact details of any Data Processors and/or Sub-processors may be provided, upon request to the Data Protection Officer.

Each Greek company of Italgas Group has appointed a Data Protection Officer who can be contacted at the e-mail address indicated in point 6, or via ordinary post at the company's registered offices.

Place and date

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Signature

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*(sign, if delivered as paper copy by hand)*

I have read the disclosure

*(check the box if attached to the on-line form)*