



HELLENIC ELECTRICITY DISTRIBUTION NETWORK
OPERATOR S.A.

PERSONAL DATA PROTECTION POLICY

Decision of the Board of Directors:
26/5.10.2026

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Section 1 – Scope, Purpose, Adoption & Review of the Policy

1. Scope & Purpose of the Policy

- 1.1 The Personal Data Protection Policy (hereinafter referred to as the "Policy") establishes the fundamental principles and rules governing the processing and protection of personal data, as well as the main roles and responsibilities for managing personal data protection issues by the company under the name "Hellenic Electricity Distribution Network Operator S.A." and the trade name "HEDNO S.A." or "HEDNO" (hereinafter referred to as the "Company") and for overseeing the adequacy of the level of personal data within the Company.
- 1.2 The Policy applies to all personal data processing activities that fall within the scope of the Company's business activities.
- 1.3 The purpose of the Policy is to protect personal data in accordance with the applicable legislative and regulatory framework, to enhance the trust of interested parties (employees, shareholders, customers, potential customers, legal representatives, partners, and other third parties), and to safeguard the reputation of the Company.

2. Policy Review

- 2.1 The Policy is reviewed at regular intervals (and in any case biennially) and revised if deemed necessary to respond to the current legal, regulatory and legislative framework. Additionally, the Policy is reviewed in the event of significant changes in business activity, such as changes in the business practices of the Company and the PPC Group, to which the Company belongs (hereinafter referred to as the "Group"), which require or result in significant changes in personal data processing. Updates to this Policy arising from Group-wide data protection policies, standards, or amendments thereto are effective for the Company only if and when approved by the Company's Board.



The review of the Policy is documented in writing, even in cases where no amendments are required.

- 2.2 The Policy is available to all Company personnel through the Internal Communication Portal and may also be published on the Company's website with a data subject privacy notice.

Part 2 – Personal Data Protection Governance Framework in HEDNO

3. Company Responsibility

The Company, in its capacity as Data Controller and/or Data Processor, bears full responsibility for compliance with the applicable legislative and regulatory framework for personal data protection, as well as with this Policy, and must be able to demonstrate its compliance at any time.

4. Obligation to appoint a Data Protection Officer (DPO)

The obligation to appoint a Data Protection Officer arises when data processing activities constitute processing operations that, due to their nature, scope, and/or purposes, may pose a high risk to the rights and freedoms of data subjects. Examples of such activities include regular and systematic monitoring of data subjects on a large scale and processing of special categories of personal data and/or data relating to criminal convictions and offences on a large scale. For assessing if processing takes place on a large scale, the following aspects are considered:

- the number of data subjects involved, either as a specific number or as a percentage of the population,
- the volume and range of data,
- the duration or permanent nature of the processing,
- the geographical extent of the processing.

5. Responsibilities of the Data Protection Officer

- 5.1 The Data Protection Officer is involved in all matters related to the protection of personal data in a timely manner, without receiving instructions from the Company for the performance of his duties. Their main tasks include:
- a. Informing and advising the Company on its obligations under the General Data Protection Regulation (GDPR) and the relevant legislative framework regarding data protection.
 - b. Monitoring the Company's compliance with the data protection legislative framework and internal policies and conducting relevant audits.

- c. Supporting the heads of Organizational Units in developing and updating specific procedures related to personal data protection within their scope.
- d. Assisting in investigating cases where data subjects have filled a complaint with the Data Protection Authority.
- e. Being informed and assisting in investigating personal data breach incidents and notifying them to the competent Authorities and/or data subjects.
- f. Conducting awareness and training activities for personnel involved in processing operations,
- g. Providing advice and support, regarding data protection impact assessments and monitoring their implementation, in accordance with this Policy.
- h. Cooperating with the supervisory authority and acting as a contact point for the supervisory authority on issues related to processing and conducting consultations, as appropriate, on any other matter.
- i. Takes into account the Group's strategic directions and general standards in the field of personal data protection, to the extent that these are compatible with the applicable EU and national law, the specific regulatory framework governing the energy sector, the Company's Management Licence, the decisions of RAAEY, and the requirements of operational independence, impartiality and non-discriminatory conduct.
- j. Adopts, following an independent assessment and approval by its competent bodies, the Group's policies, procedures and standards on personal data protection and adapts them to the Company's specific activities, operations and risks, in a manner compatible with the applicable EU and national law, the specific energy regulatory framework and the Company's operational independence requirements. The adoption and implementation of such policies shall not restrict the Company's independent authority, responsibility and accountability, nor the independence of its Data Protection Officer, and shall not grant any other Group company the right to access or use the Company's data without a specific legal basis, a specific purpose, necessity, proportionality, and appropriate security and confidentiality safeguards.
- k. Collaborating with the Chief Information Security Officer on security-related matters (e.g. designing technical and organizational measures, managing personal data breach incidents).
- l. Providing support and guidance on personal data protection matters, including the analysis of data processing activities and the provision of advice regarding compliance requirements, upon request of the heads of organizational units.

- m. Informing annually the Management of the Company about the Company's compliance program with personal data protection legislation.
- 5.2 The Company must provide the Data Protection Officer with the necessary financial and human resources required for the performance of their duties.

6. Cooperation Framework between the Company's Data Protection Officer and the Group Data Protection Officer (Group DPO)

- 6.1 The Group Data Protection Officer develops, at Group level, common principles, guidelines, minimum standards and tools to support compliance with personal data protection legislation. Such principles, guidelines, standards and tools shall apply to the Company following an independent assessment and approval, adapted to its specific activities and regulatory obligations.
- 6.2 The Data Protection Officer shall cooperate with the Group Data Protection Officer in designing, at framework level, mechanisms for monitoring and assessing the Company's compliance with personal data protection legislation. Such mechanisms may include compliance indicators, self-assessment procedures and the periodic exchange of reports. Their implementation shall be independently approved and carried out by the Company and shall not restrict the independence of the Company's Data Protection Officer.
- 6.3 Within the framework of the applicable legislation, the regulatory obligations of HEDNO S.A., and the principles of necessity, proportionality, data minimisation and confidentiality, the Company shall provide, through its Data Protection Officer, the Group Data Protection Officer with the information that is objectively necessary for the preparation of consolidated Group-level reports concerning the Company's compliance status. As a rule, such reports shall include aggregated and anonymised information relating to: (i) the availability and adequacy of the required compliance documentation, such as records of

processing activities, data protection updates and data protection impact assessments (DPIAs); (ii) operational data protection matters, such as complaints before the Hellenic Data Protection Authority, data subject requests for the exercise of their rights, and personal data breach incidents; and (iii) the results of compliance monitoring activities carried out by the Company's Data Protection Officer. The Company shall independently assess and take the appropriate measures to address any weaknesses or risks identified. The Group Data Protection Officer may monitor the implementation of such measures exclusively for information and reporting purposes, without assuming or replacing the Company's independent responsibility and authority.

7. Duties of Heads of Departments

The heads of departments who hold responsibility for personal data processing activities shall bear operational responsibility for compliance with data protection legislation and monitoring adherence to this Policy. Ενδεικτικά, είναι υπεύθυνοι να:

- a. Informing the Data Protection Officer at an early stage regarding new or amended personal data processing activities, whether arising from strategic planning and/or urgent operational requirements, in order to ensure that any personal data protection issues are examined and assessed.
- b. Ensuring that the staff under their supervision are suitably trained and informed on personal data protection matters.
- c. Entering into data processing agreements in accordance with paragraph 27 of this Policy and supervising processors regarding fulfilment of their obligations for the protection of personal data (e.g. adherence to instructions and implementation of technical and organisational measures for data processing security).
- d. Maintaining up-to-date records of the processing activities for which they are responsible, in accordance with paragraphs 18.2 and 18.3.
- e. Ensuring compliance with the data processing principles stipulated in legislation and in this Policy.
- f. Ensuring that a Data Protection Impact Assessment is conducted where required, prior to commencing any processing that may pose a high risk to the rights of data subjects, and in co-operation with the Data Protection Officer, in accordance with paragraph 29.

- g. Implementing appropriate organisational and/or technical measures for personal data protection and ensuring compliance with obligations deriving from the Company's Cybersecurity policies, in cooperation with the Chief Information Security Officer. Such measures shall indicatively include access control, pseudonymisation or encryption, ensuring availability and integrity of systems, as well as the ability to detect and respond promptly to incidents of data breaches.
- h. Responding fully and accurately within the prescribed timeframes to requests for information made in the context of inspections and investigations carried out by competent supervisory authorities.

8. Employees' Obligations

- 8.1 All employees and service providers to the Company, irrespective of their employment status, are mandated to adhere to the legal framework governing personal data protection and the relevant rules as delineated in this Policy. They are also required to actively contribute to maintaining the requisite level of protection and security of personal data, promoting a culture of responsible and secure data management within the Company.
- 8.2 Employees receive training on the basic principles of personal data protection at least every two years. Participation in this training is mandatory.
- 8.3 Violation of the Policy may result in the consequences provided for in applicable legislation and the Company's regulatory framework.

Part 3 – Core Principles of Personal Data Processing

9. Purpose Limitation

9.1 Personal data are collected for specified, explicit, and legitimate purposes and are not further processed in a manner incompatible with those purposes ("purpose limitation").

9.2 Prior to any further processing for a different purpose, the following criteria are considered:

- *Any correlation between the purposes for which the personal data were collected and the purposes of the intended further processing,*
- *The context in which the personal data have been collected, particularly regarding the relationship between the data subjects and the Company in its role as data controller,*
- *The nature of the personal data, especially concerning special categories of personal data,*
- *The potential consequences of the intended further processing for the data subjects,*
- *The presence of appropriate safeguards, which may include encryption or pseudonymization.*

10. Data Minimization

10.1 The Company processes personal data only if the data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ("data minimization principle").

10.2 When designing new systems, services, or processes involving the processing of personal data, the principle of data minimization is

applied from the design stage. Only the personal data strictly necessary for the defined purpose are collected.

11. Data Accuracy

- 11.1 The Company takes measures to ensure that personal data are accurate and, where necessary, kept up to date ("accuracy").
- 11.2 In the event that personal data are inaccurate with respect to the purposes of processing, the Company takes steps for their immediate deletion or correction.

12. Storage Limitation

- 12.1 The Company shall take measures to ensure that personal data are kept in a form that permits the identification of data subjects only for the time necessary for the purposes of personal data processing ("storage period limitation").
- 12.2 When the purpose for processing personal data has been achieved, the personal data must be deleted or anonymized, unless otherwise specified in the applicable legal framework.
- 12.3 The retention period for personal data shall be defined based on the purposes for which the data is processed and any applicable legal or regulatory requirement. The retention period must be justified accordingly.
- 12.4 The prescribed retention periods are documented in the Record of Processing Activities of the Company, in accordance with Article 30 of the GDPR.

13. Fairness in Processing

- 13.1 Personal data processing shall be conducted in accordance with the principle of fairness, ensuring that each processing activity is fair, equitable and impartial, towards data subjects.
- 13.2 The Company is committed to maintaining practices that promote transparent and fair treatment of all data subjects,

without discrimination or bias, regardless of gender, age, nationality, religion, political beliefs, or other characteristics.

- 13.3 Fairness shall be ensured both in the design of processing procedures and their implementation, avoiding practices that result in unfair or disproportionate outcomes to the detriment of the data subjects.

14. Lawfulness of Processing

- 14.1 Processing of personal data is lawful only if and to the extent that at least one of the following applies:
- a. The data subject has given consent to the processing of their personal data for one or more specific purposes (GDPR, Art. 6.1(a)).
 - b. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (GDPR, Art. 6.1(b)).
 - c. Processing is necessary for compliance with a legal obligation to which the controller is subject (GDPR, Art. 6.1(c)).
 - d. Processing is necessary to protect the vital interests of the data subject or another natural person (GDPR, Art. 6.1(d)).
 - e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller (GDPR, Art. 6.1(e)).
 - f. Processing is necessary for the purposes of the legitimate interests pursued by the Company as the data controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, especially if the data subject is a child (GDPR, Art. 6.1(f)).
- 14.2 Processing of special categories of personal data is prohibited, unless:
- a. The data subject has given explicit consent to the processing of those personal data for one or more specified purposes (GDPR, Art. 9.2(a)).
 - b. Processing is necessary for the performance of obligations and the exercise of specific rights of the Company, as the data controller or of the data subject in the field of employment and social security and social protection law, in so far as it is authorized by national law or a collective agreement pursuant to

national law providing for appropriate safeguards for the fundamental rights and interests of the data subject (GDPR, Art. 9.2(b)).

- c. Processing is necessary to protect the vital interests of the data subject or of another natural person, where the data subject is physically or legally incapable of providing consent (GDPR, Art. 9.2(c)).
- d. Processing relates to personal data which have been manifestly made public by the data subject (GDPR, Art. 9.2(e)).
- e. Processing is necessary for the establishment, exercise, or defense of legal claims (GDPR, Art. 9.2(f)).
- f. Processing is necessary for reasons of substantial public interest, based on Union or Member State law, provided that it is proportionate to the objective pursued, respects the essence of the right to personal data protection, and includes appropriate and specific measures to safeguard the fundamental rights and interests of the data subject (GDPR, Art. 9.2(g)).
- g. Processing is necessary for the purposes of preventive or occupational medicine, the assessment of employees' working capacity, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional (GDPR, Art. 9.2(h)).
- h. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Union or Member State law, which shall be proportionate to the objective pursued, respect the essence of the right to personal data protection, and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject (GDPR, Art. 9.2(i)).

15. Consent of data subject

- 15.1 When processing is based on the consent of the data subject, the Company must be able to demonstrate that the data subject has consented to the processing activity.
- 15.2 If the data subject's consent is given within the context of a written declaration that also pertains to other matters, the request for consent must be presented in a manner that is clearly distinguishable from the other matters, in an understandable and easily accessible form, using clear and plain language.

- 15.3 Consent must be given by a clear affirmative act that indicates a freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of personal data relating to them, for instance by a written statement, including by electronic means (e.g., ticking a box when visiting a website), or by an oral statement.
- 15.4 When processing has multiple purposes, consent must be given for all of them.
- 15.5 If the data subject's consent is to be obtained by electronic means, the request for consent must be clear, concise, and not unnecessarily disruptive to the use of the service for which it is provided.
- 15.6 The data subject has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- 15.7 Prior to providing consent, the data subject is informed at least about the purpose of personal data processing and the identity of the Controller.
- 15.8 Withdrawal of consent is as easy as providing it.
- 15.9 In assessing whether consent is freely given, utmost account is taken of whether, among others, the execution of a contract, including the provision of a service, is made conditional on consent to the processing of personal data that is not necessary for the execution of that contract.
- 15.10 To ensure that consent is freely given, consent should not form a valid legal basis where there is a clear imbalance between the data subject and the data controller.
- 15.11 Evidence of consent must be easily accessible and available in order to respond to the exercise of data subjects' rights and prove compliance.

16. Information to be provided regarding processing of personal data

- 16.1 The Company, in its capacity as data controller, must provide the data subject with the following information:
- a. The identity and contact details of the Company
 - b. The contact details of the Data Protection Officer
 - c. The purposes of processing for which the personal data are intended as well as the legal basis for the processing
 - d. The source from which the personal data originates, and, if applicable, whether they originate from publicly accessible sources
 - e. If the processing is based on the legal basis of legitimate interests, description of the legitimate interests pursued by the controller or by a third party
 - f. The recipients, or the categories of recipients of personal data, if any
 - g. Where applicable, information about transfers of personal data outside the European Economic Area
 - h. The period for which the personal data will be stored, or, when that is not possible, the criteria used to determine that period.
 - i. The right to request from the Company access to, correction or erasure of personal data, or restriction of processing relating to the data subject, or object to processing, as well as the right to personal data portability.
 - j. In cases where processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
 - k. The right to lodge a complaint with the supervisory authority.
 - l. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and the possible consequences of failure to provide such data.
 - m. The use of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject
- 16.2 When the Company intends to further process personal data for a purpose other than that for which they were collected, the

Company shall provide the data subject, prior to that further processing, with information on that other purpose with any other necessary information, as referred to in paragraph 16.1.

17. Automated Decision-Making, Including Profiling

- 17.1 The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects for them or similarly significantly affects them.
- 17.2 Exceptionally, automated decision-making that produces legal effects or significantly affects the data subject is permitted when the decision:
 - a. Is necessary for entering into, or performance of, a contract between the data subject and the Controller,
 - b. Is authorized by law, or
 - c. Is based on the explicit consent of the data subject.
- 17.3 In the abovementioned cases, the Company:
 - a. Implements appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, at least the right to obtain human intervention on the part of the Company, to express a point of view and to contest the decision.
 - b. Provides information on the logic, as well as the significance and the envisaged consequences of the processing.
- 17.4 Furthermore, the decisions taken should not concern children or be based on special categories of data, unless, in the latter case, the Company has the explicit consent of the data subject.

18. Record of Processing Activities

- 18.1 The Company keeps a record of all processing activities it undertakes.
- 18.2 For activities where the Company acts as a data controller, the record includes:
 - a. The name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the Data Protection Officer

- b. The purposes of the personal data processing.
 - c. A description of the categories of data subjects and the categories of personal data.
 - d. The categories of recipients, including recipients in third countries.
 - e. Where applicable, transfers of personal data to a third country, including identification of said third country and documentation of appropriate safeguards.
 - f. Where possible, the envisaged time limits for erasure of the different categories of personal data.
 - g. Where possible, a general description of the technical and organizational security measures.
- 18.3 For activities where the Company acts as a data processor, the record includes
- a. The name and contact details of the Company, and the data controllers on whose behalf it acts, as well as the Data Protection Officer.
 - b. The categories of processing activities carried out on behalf of each data controller.
 - c. Where applicable, transfers of personal data to a third country, including identification of said third country and documentation of appropriate safeguards.
 - d. Where possible, a general description of the technical and organizational security measures.
- 18.4 The record of processing activities is updated when changes in processing activities occur, while its accuracy and completeness are periodically reviewed by the Departments' Managers.

Part 4 – Data Subject Rights

19. Right to Access (Article 15 GDPR)

- 19.1 Data subjects have the right to access the information referenced in paragraph 16 of this Policy.
- 19.2 The related information should be made available to the data subject in a comprehensible format and within a reasonable time frame. This is generally achieved through printed or electronic communication.
- 19.3 In any case, the data subject should be informed within one month from the receipt of the request. This period may be extended by two additional months where necessary, considering the complexity and number of requests. The data subject should be informed of any such extension.
- 19.4 The Company provides a copy of the personal data undergoing processing. For any additional copies requested by the data subject, the Company may charge a reasonable fee for administrative costs.

20. Right to Rectification (Article 16 GDPR)

The data subject has the right to request the rectification of inaccurate personal data, or the completion of incomplete personal data concerning them

21. Right to Erasure (“Right to be Forgotten”, Article 17 GDPR)

- 21.1 The data subject may request the erasure of personal data, particularly when the data is no longer necessary, when the data subject withdraws consent, or objects to the processing.
- 21.2 Erasure does not apply in cases where processing is necessary for compliance with a legal obligation that requires processing, or for the establishment, exercise, or defense of legal claims.

22. Right to Restriction of Processing (Article 18 GDPR)

The data subject may request the restriction of processing mainly when:

- a. The accuracy of personal data is contested by the data subject, for a time period allowing the Company to verify the accuracy of the personal data,
- b. The processing is unlawful, and the data subject opposes to the erasure of personal data and requests the restriction of their use instead,
- c. The Company no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims,
- d. The data subject has objected to the processing, while the verification of whether the legitimate grounds of the controller override those of the data subject remains pending.

23. Right to Object (Article 21 GDPR)

- 23.1 The data subject has the right to object, at any time and on grounds relating to their particular situation, to the processing of their personal data, which is based on legitimate interests.
- 23.2 The Company shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.
- 23.3 If personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of their personal data for the specific marketing purposes, which may include profiling to the extent that it is related to such direct marketing.
- 23.4 When data subjects object to the processing for direct marketing purposes, their personal data shall no longer be processed for such purposes.

24. Right to Personal Data Portability (Article 20 GDPR)

- 24.1 The data subject has the right to receive the personal data concerning them, which they have provided to the data controller, in a structured, commonly used, and machine-readable format, when processing is based on consent or a contract and carried out by automated means.
- 24.2 In exercising the right to personal data portability pursuant to paragraph 26.1, the data subject has the right to have personal data transmitted directly from one controller to another, where technically feasible.

25. Right to Withdraw Consent (Article 7 GDPR)

- 25.1 When processing is based on the data subject's consent, data subjects retain the right to withdraw consent at any time, without affecting previous processing based on consent.
- 25.2 The data subject has the right to object at any time to the use of their personal data if such data are used for purposes not mandated by law.
- 25.3 The right to object applies even if the data subject had previously given consent for the use of their personal data.

26. Exercising Data Subject Rights

- 26.1 The Company manages data subjects' requests following specific procedures.
- 26.2 The Company responds to data subjects' requests without undue delay and in any event within one month of receipt of the request. This deadline may be extended by two further months where necessary, considering the complexity of the request and the number of requests made.

- 26.3 In the event of a delay, the Company informs the data subject of the extension within one month from the receipt of the request, along with the reasons for the delay.
- 26.4 If the data subject submits the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.
- 26.5 The Company uses all reasonable measures to verify the identity of a data subject requesting access, retaining identification data only for the time needed. The Company must not retain personal data solely for the purpose of responding to potential future data subject requests.
- 26.6 The Company reserves the right to refuse, wholly or partially, a data subject's request only when it falls under a GDPR exception or a national law provision. In any case, the data subject is informed in writing and with reasoning about the decision not to satisfy their request, as well as about their right to file a complaint with the Data Protection Authority (DPA).

Part 5 – Commissioned Data Processing and Personal Data Transfers Outside the EEA

27. Due Diligence and Contractual Requirements

- 27.1 Whenever the Company assigns personal data processing to a processor or undertakes personal data processing on behalf of a controller or jointly processes personal data with another controller, it must demonstrate due diligence in regulating the lawful and fair processing of personal data before concluding the corresponding agreement.
- 27.2 The Company shall only use data processors who provide sufficient guarantees to implement appropriate technical and

organizational measures in such a manner that processing meets the requirements of the GDPR and ensures the protection of the rights of the data subjects.

27.3 The engagement of a data processor shall be governed by a data processing agreement, which is legally binding on the processor with respect to the Company acting as data controller and clearly sets forth the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects involved, as well as the rights and obligations of the Company. In particular, the agreement shall stipulate that the data processor:

- a. Processes personal data solely on documented instructions from the Controller, including instructions regarding transfers of personal data to a third country or an international organization, unless required to do so by Union or Member State law to which the processor is subject. In such cases, the processor shall inform the Company of the legal requirement before processing, unless the law prohibits such information on important grounds of public interest.
- b. Ensures that persons authorized to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.
- c. Takes all necessary technical and organizational measures.
- d. Does not engage another processor without prior specific or general written authorization from the Controller. In the case of general written authorization, the processor informs the Controller of any intended changes regarding the addition or replacement of other processors, thereby giving the Controller the opportunity to object to such changes.
- e. When the processor engages another processor for carrying out specific processing activities on behalf of the Controller, the same personal data protection obligations as set out in the agreement between the Controller and the processor are imposed on that other processor by way of a contract, in particular, providing sufficient guarantees to implement appropriate technical and organizational measures so that processing will meet the requirements of the GDPR.
- f. Takes account of the nature of the processing and assists the Controller by appropriate technical and organizational measures, insofar as this is possible, for fulfilling the Company's obligation to respond to requests for exercising the data subject's rights.

- g. Assists the Controller in ensuring compliance with obligations regarding the security of processing, management of personal data breach incidents, and conducting impact assessments, considering the nature of processing and the information available to the processor.
 - h. At the choice of the Controller, deletes or returns all personal data to the Company after the end of the provision of processing services and deletes existing copies, unless Union or Member State law requires the storage of the personal data.
 - i. Makes available to the controller all information necessary to demonstrate compliance with the obligations set forth and allows for and contributes to audits, including inspections conducted by the Controller or another auditor mandated by the Company.
- 27.4 The Company must implement appropriate monitoring mechanisms to ensure that services provided by processors are in compliance with the obligations set out in the agreed contracts.
- 27.5 In cases where the Company acts as a joint controller with another legal entity, an agreement must be made between the parties, transparently setting out their respective responsibilities for compliance with GDPR obligations, particularly regarding the exercise of the data subjects' rights and corresponding duties to provide information to data subjects. The agreement may specify a point of contact for data subjects.

28. Personal Data Transfers Outside the EEA

- 28.1 Any transfer of personal data to a country outside the European Economic Area (EEA)¹ or to an international organization shall only occur only if the conditions set forth in the GDPR are met, ensuring that the level of protection of natural persons guaranteed by the GDPR is not undermined.
- 28.2 Personal Data transfer outside the EEA may occur under the following circumstances:

¹ EU Countries, Iceland, Norway and Liechtenstein

28.2.1 The European Commission has issued an Adequacy Decision confirming that the level of personal data protection in a country outside the EEA or in an international organization is essentially equivalent to that in the European Economic Area.

28.2.2 Appropriate safeguards are provided regarding the recipient organization according to Article 46 of the GDPR (e.g., EU standard contractual clauses, binding corporate rules), while simultaneously, the legal entity acting as the exporter conducts a Transfer Impact Assessment to determine whether the legislation or practices of the non-EEA country prevent the effectiveness of the appropriate safeguards (for example, due to legislation compelling access to personal data). If the assessment indicates that third-country laws or practices affect the effectiveness of the transfer tool, then the transfer can occur only if the exporter establishes additional measures to ensure that the level of protection of the transferred personal data approaches the EU standard of substantive equivalence.

28.2.3 The transfer takes place based on one of the derogations provided in Article 49 of the GDPR as follows:.

- a. the data subject has expressly consented to the proposed transfer, having been informed of the potential risks that such transfers pose to the data subject rights in the absence of an adequacy decision and appropriate safeguards,
- b. the transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken at the request of the data subject,
- c. the transfer is necessary for the conclusion or performance of a contract concluded for the benefit of the data subject between the data controller and another natural or legal person,
- d. the transfer is necessary for important reasons of public interest,
- e. the transfer is necessary for the establishment, exercise or defence of legal claims,
- f. the transfer is necessary to protect the vital interests of the data subject or of other persons where the data subject lacks the physical or legal capacity to give consent,
- g. the transfer is carried out from a registry which, in accordance with EU or State Member State law, is intended to provide



information to the public and is open for consultation either by the general public or by any person who can rely on a legitimate interest, but only if the conditions laid down in Union or Member State law are met in each case.

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Part 6 – Data Protection by Design & Security in Processing

29. Data Protection Impact Assessment (DPIA)

- 29.1 When a type of processing, particularly with the use of new technologies, considering the nature, scope, context, and purposes of processing, is likely to result in a high risk to the rights and freedoms of natural persons, the Company shall conduct, prior to processing, an assessment of the impact of the envisaged processing operations on the protection of personal data.
- 29.2 An assessment may cover a set of similar processing operations that present similarly high risks.
- 29.3 A Data Protection Impact Assessment is required in particular in cases of:
- a. Systematic and extensive evaluation of personal aspects relating to natural persons, based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person.
 - b. Large-scale processing of special categories of data or personal data relating to criminal convictions and offenses.
 - c. Systematic monitoring of a publicly accessible area on a large scale.
 - d. Any processing operation included in the list established by the competent Data Protection Authority regarding the types of processing operations subject to the requirement for a DPIA.
- 29.4 The assessment contains at least:
- a. A systematic description of the envisaged processing operations and the purposes of processing, including, where applicable, the legitimate interests pursued by the Controller.
 - b. An assessment of the necessity and proportionality of the processing operations in relation to the purposes.
 - c. An assessment of the risks to the rights and freedoms of data subjects.
 - d. The envisaged measures to address the risks, including safeguards, security measures, and mechanisms to ensure the protection of personal data and to demonstrate compliance with

the legislative framework, taking into account the rights and legitimate interests of data subjects and other stakeholders.

- 29.5 The DPIA is conducted under the authority of the Division Head responsible for overseeing the relevant processing activities. When conducting a DPIA, the opinion of the Data Protection Officer is sought regarding:
- a. Whether or not a DPIA is required for the personal data processing.
 - b. Which methodology should be followed for conducting the DPIA.
 - c. Whether the DPIA will be conducted internally or it shall be outsourced to an external partner. In the case of outsourcing, the external party selection is done with the approval of the Data Protection Officer
 - d. The type of safeguards (including technical and organizational measures) the Company should apply in order to mitigate risks to the rights and interests of data subjects.
 - e. Whether the DPIA was correctly conducted and whether its conclusions (regarding whether or not to proceed with the processing and what safeguards to implement) are consistent with relevant legislation.
- 29.6 If the DPIA indicates that the processing operation would result in a high residual risk, the Company must, according to Article 36 GDPR, consult the competent supervisory authority prior to processing.

30. Security of processing

- 30.1 Taking into account the state of the art, the costs of implementation, and the nature, scope, context, and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Company implements appropriate technical and organizational measures to ensure an appropriate level of protection of personal data against risks.
- 30.2 When assessing the appropriate level of security, particular consideration is given to the risks presented by processing, particularly from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.

30.3 Measures should include, inter alia:

- a. Measures to prevent unauthorized individuals from accessing personal data processing systems.
- b. Measures to ensure that authorized persons for personal data processing systems have access only to personal data they are authorized to handle.
- c. Measures to ensure that personal data cannot be read, copied, altered, or deleted by unauthorized persons during processing (e.g., encryption or pseudonymization).
- d. Measures to ensure that personal data processed by third parties/processors are processed only in accordance with the instructions of the controller.
- e. Measures to ensure that personal data are protected against accidental destruction or loss (e.g., backups, system recovery plans, etc.).
- f. Measures to ensure that personal data collected for different purposes are processed separately.

30.4 Additionally, the Company applies appropriate technical and organizational measures to ensure that, by default, only personal data necessary for each specific purpose of processing are processed. This obligation applies to the amount of personal data collected, the extent of processing, the storage period, and their accessibility. Specifically, these measures ensure that, by default, personal data are not made accessible without personal intervention to an indefinite number of persons.

31. Personal Data Breach

- 31.1 Each Company must be able to assess the risk arising from a personal data breach incident concerning the rights and freedoms of natural persons. Within this context, it must have procedures for timely and effective identification and management of data breach incidents.
- 31.2 When assessing the risk of an incident to the data subject's rights and freedoms, the specific circumstances of the breach are examined, including its severity and potential impacts. The assessment must particularly consider the following criteria:

- a. Type of breach,
- b. Nature, sensitivity, and volume of affected personal data,
- c. Degree of identifiability of the data subject,
- d. Severity of consequences for the data subject,
- e. Special characteristics of the data subject,
- f. Number of data subjects affected.

32. Notification of Personal Data Breaches

- 32.1 In the event of a personal data breach, the Company, acting as Controller, must notify the relevant supervisory authorities according to the GDPR and national law.
- 32.2 When the personal data breach is likely to result in a high risk to the rights and freedoms of individuals, the Company must promptly notify the data subject of the personal data breach.
- 32.3 If the Company is acting as a processor, it shall notify the controller without undue delay after becoming aware of a personal data breach.

33. Documentation of Personal Data Breaches

- 33.1 The Company maintains an appropriate record of personal data breach incidents.
- 33.2 This record includes all details regarding the incident (date, actions, involved parties, action plan, etc.) as well as details about its assessment and the notification to supervisory authorities and/or data subjects.

Appendix

A. Definitions

Controller

The legal or natural person or other entity that determines the purposes and means of processing personal data and assigns the personal data processing to the Company.

Processor

The legal or natural person or other entity that processes personal data on behalf of the Controller.

Joint Controller

The natural or legal person who, along side with the Controller, determines the purposes and means of processing personal data.

Personal data

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 Personal Data

These are personal data related to:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Sex life or sexual orientation of a natural person

Data Subject

An identified or identifiable natural person to whom the data refers to.

Processing of Personal Data

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

Profiling

Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

Personal Data Breach

A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Pseudonymization

Processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

Recipient

A natural or legal person, public authority, agency or another body to which personal data are disclosed, whether it is a third party or not.

Third Party

A 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 authorized to process personal data.

Consent of the Data Subject



Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Supervisory Authority

An independent public authority established by a Member State responsible for monitoring the application of personal data protection law in order to protect the fundamental rights and freedoms of data subjects concerning processing and to facilitate the free flow of personal data within the Union.

Encryption

The process of converting personal data from its original form into a coded form that can only be read by those who possess the appropriate cryptographic key to decrypt it.

B. Document Information

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