

# PERSONAL DATA PROTECTION STATEMENT

In ELPEDISON, having as our strategic objective to ensure the optimal protection of our customers' personal data, we consider that it is our duty to inform you about our practices, choices, as well as your rights concerning personal data collection and processing.

## I. Our principles and values

- We fully respect our customers and make the protection of your privacy our company's priority.
- We handle your personal data in full transparency.
- We collect and process your data for lawful, legitimate, explicit and predetermined purposes only.
- We handle all our customers' information as confidential, applying every technical and organisational means necessary for their protection.
- We do not disclose or transmit your personal data to third parties without your consent, unless so permitted by Law or by our agreement.
- We fully respect the legislation applicable in general and comply with all our responsibilities arising from it, as competent data controllers.

## II. What personal data do we collect?

The kind of data that we collect depends on the products or services that you select to be provided to you. More specifically, within the framework of performance of our electricity supply agreement or natural gas agreement, we collect the following personal data:

- Your personal details (e.g. full name, sex, date of birth, ID no., TIN or any other identification element).
- Your contact information (e.g. phone number, address, e-mail address and fax).
- Credit, debit or other charge cards (e.g. card holder name, card number, billing address, expiry date), provided that you choose credit card as your method of payment.
- Connection data (previous statements, amount, meter number, etc.)
- Assets (e.g. lease)
- Data from recorded calls
- Energy profile data (level of consumption, monetary amount, existence of heat accumulators, etc.)
- Vulnerable Customer data

## III. How do we collect your personal data?

We collect our customers' personal data in various ways, including:

- When you fill in our application for an electricity supply agreement
- When you contact one of our partners - call centre
- When you contact us in order to create or to manage your residential or professional electricity or natural gas account.
- Following collaboration with third parties, such as with TIRESIAS S.A., in order to check your credit rating.

## IV. For what purposes do we collect and process your personal data?

In the framework of the conclusion and operation of your contract with our company or in the framework of our legal interests, we collect and process your personal data, as well as information pertaining to the consumption of electricity or natural gas and/or other product you have chosen, in order to be able to provide you with the requested services, to issue your bill and to inform you about the consumption, and to manage, provide, customise and improve our services and business activities. In particular, your personal data may be collected and processed by our company for the following purposes, which are considered necessary for the performance of our agreement and our legal rights:

- To issue and forward you the bills for the consumption of electricity and/or natural gas and/or other product you have chosen.
- To provide you with the products and/or services required based on the specific provisions of our agreement.
- To notify you about important modifications or developments as regards already provided services.
- To contact us via e-mail, fax, telephone or other means, for any matter arising out of the performance of our agreement, including indicatively response to your questions or complaints concerning our products and services provided.
- To carry out controls in the TSEK system of TIRESIAS S.A. and assess or reassess the trading risk assumed in the framework of this agreement.
- To assign a search for any arrears in case of an irregular development of our contractual relation to a debt collection company.
- To protect our rights before any Court and any Authority, as well as for court decision performance and compliance purposes or the provisions of Law, Directives, Regulations, circulars.
- For account protection insurance, in case this is provided by the relevant product you have chosen.
- To promote to you products and services via SMS, telephone, e-mail, fax, correspondence, social media and/or any other appropriate communication channels.
- To formulate your energy profile in order to meet your needs and provide you with the appropriate products and/or services. You can find basic information on the formulation of your energy profile on our website (<https://www.elpedison.gr/en/customer-service/faq/>).

During your pre-contractual service, we collect and process your personal data to contact you upon your request. In case you contact us to settle your arrears, we process your personal data on your demand.

Additionally, and if you so expressly wish and consent, our company may process your data for the following additional purposes:

- To conduct a research and/or analysis in order to better understand your needs, preferences, interests, experiences and/or habits as a consumer.
- For the operation and management of any loyalty programs and/or reward schemes.

## V. Who do we disclose and/or transmit your personal data to?

In order to facilitate the attainment of our objectives, which are referred to in point "IV. For what purposes do we collect and process your personal data?", we may transmit, disclose, grant access to your personal data or share it with third parties. In this case, third parties may be:

- Any third-party providing management, trading, research, distribution, data processing, teleshopping, telecommunications, payment or card storage services and tokenization or other services or supporting the operation of our company's activities.
- Any third-party providing customer care services.
- Other partners providing data centres or, servers or software products to our company.
- Promotion companies or market research companies.
- Financial institutions.
- Lawyers, law firms and legally operating debt collection companies, in accordance with the specific provisions of the applicable legislation.
- Insurance companies.
- TIRESIAS S.A.
- Public agencies, Legal Persons Governed by Public Law, Legal Persons Governed by Private Law, judicial authorities, regulatory institutions and bodies, regardless of jurisdiction or instance, as long as this is required by Law, Judicial Decision, Regulation, Directive, order, opinion, circular etc.
- Auditors, accountants, notaries, lawyers, court bailiffs or other financial or professional advisors.
- Third suppliers under the provisions in force as regards the electricity or natural gas supply.
- Our special or general successors, in case of sale, disposal, winding up, liquidation of our company.

## VI. How do we safeguard the protection of your personal data?

In order to ensure the proper use and integrity of the collected personal data, as well as prevent unauthorised or random access, processing, deletion, distortion or other use thereof, our company implements different internal policies, while adopting all the necessary organisation, technical, physical, electronic and procedural safety measures, as well as technological standards in accordance with the applicable Laws and Regulations.

## VII. How long do we keep your personal data for?

We keep your personal data for as long as needed for the purposes that they were collected and in any case for a period no longer than five years after the termination or expiration of the agreement, excluding the case of pending lawsuits or administrative procedures, in which case this period is extended until the adoption of a final decision or the completion of the procedure before the Administrative Authority. Subsequently, they are removed from our files and system, in compliance with the policy of our company and under the provision that their retention is no longer required for the fulfilling of the purposes that we have described above or for the coverage of our operational, tax or accounting requirements or for the protection of our rights before any Court or any Authority.

In case you do not conclude a contract with us, we keep your personal data for a period of ten (10) days.

## VIII. What are your rights?

As our customers you have the right to request and to be given access, information and transfer to another data controller and a copy of your personal data, that we collect and process. If you wish to receive a copy of part or of all of your personal data, please contact us using the contact details of our company listed on the relevant section hereof "IX. How to contact us?".

In any case, we wish to ensure the accuracy of your personal data. Therefore, in case you realise that some of your personal data are inaccurate or incomplete, do not hesitate to request the correction or completion of these data.

Furthermore, we would like to inform you that you have the right to request the deletion of your personal data if (a) they are no longer necessary for the fulfilment of the purposes of our contractual relation, (b) they have been unlawfully processed and beyond the purposes described in detail herein, (c) it is required by Law.

Moreover, you have the right to revoke your consent provided to us for certain process purposes and oppose the collection and processing of your personal data by our company.

In any case, you have the right to appeal to the Personal Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) if you consider yourself wronged by the processing of your personal data.

## IX. How to contact us?

For more information or clarifications concerning our company's policy for the protection of your personal data, contact us either by post at the address listed in the contact information below: ELPEDISON S.A., to the attention of the Data Protection Officer (DPO), 18-20 Amaroussiou-Chalandriou St., 15125 Maroussi, tel. +30 2103441000

or via e-mail at the address [dpo@elpedison.gr](mailto:dpo@elpedison.gr). We will be happy to accommodate you.

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