



PRIVACY POLICY FOR PROVISIONAL & FINAL CONTRACTORS

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A. General Information and Data Controller

The company operating under the name “Hellenic Electricity Distribution Network S.A.” and the distinctive title “HEDNO S.A.” or “HEDNO” (hereinafter “the Company”) with registered office in the Municipality of Athens, Perraivou 20 & Kallirrois 5, 117 43 Athens, with Company Registration no. 41268/01/B/98/411 and TAX ID no.: 094532827 , Tax Office: Commercial Companies Athens Office (FAE Athinon) is prioritizing the protection of the personal data they are processing, acting in their capacity as Data Controller. To this end, the Company always complies with the applicable laws on data protection.

This Privacy Policy (or “Policy”) has the purpose of providing information to provisional and final contractors and bidders regarding the personal data that the Company collects and processes as part of calls for tenders and the performance of relevant contracts and projects as well as the purposes and the means for the collection, storage, use and transfer of these data. It also has the purpose of informing you about your rights under the law on personal data protection.

This Policy may be reviewed from time to time, if necessary. To stay informed about any updated versions of this Policy, please check the portal of the Company regularly. For any questions, please contact us at data_privacy@deddie.gr.

B. Short clarifications - Definitions.

- Personal Data: Means any information relating to an identified or identifiable natural person (“Data Subject”) Identifiable natural person means the person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number or their physical characteristics.
- Processing: Means any operation or set of operations which is performed on 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.
- Data Controller: means 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.
- Data Processor: means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller.



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- Third Party: means any natural or legal person, public authority, agency or other body other than the Data Subject, Data Controller, Data Processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorized to process personal data.

C. Categories of Data Subjects whose data are processed as part of calls for tenders and the performance of relevant contracts and projects.

1. Cooperators, provisional and final contractors, subcontractors and bidders as part of calls for tenders and the performance of relevant contracts and projects, provided that they are natural persons, sole traderships or general partnerships or limited partnerships.
2. Members of Boards of Directors, operators and legal representatives of provisional and final contractors, subcontractors and bidders as part of calls for tenders and the performance of relevant contracts and projects.
3. Employees at the provisional and final contractors, subcontractors and bidders as part of calls for tenders and the performance of relevant contracts and projects.

D. Purposes of the collection and processing of personal data.

The Company shall process personal data acting in its capacity as contracting authority, as part of calls for tenders and the performance of relevant contracts and projects, for the following purposes:

1. To confirm that all required and legal conditions for the submission of bids to each tender are met by the bidders and to verify their general compliance with the legal requirements and the conclusion and performance of the contract.
2. To confirm that all required and legal conditions are met by the members of Boards of Directors, operators and legal representatives of the provisional and final contractors, subcontractors and bidders as part of calls for tenders and the performance of relevant contracts and projects.
3. To confirm that all required and legal conditions for the timely and full payment of employee fees are met by the contractor-employer and that the latter generally complies with the legal requirements arising from the contract and the law.

E. Categories of data processed by the Company.

1. Personal data and documents which are submitted as part of the requirements of each call for tender, including, but not limited to, full name of natural person or company name, company address, Tax ID number, Tax Office, registration number, General Commercial Registry (GEMI) number.
2. Full name, capacity/position of the members of boards of directors, operators and legal representatives of the provisional and final contractors, subcontractors and bidders, Tax ID



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number, Tax Office, criminal record details. For this category of subjects, the Company shall provide, through their cooperator or the bidder, extra information on the processing of their data and their rights.

3. With regard to the employees of contractors and the bidders, the Company processes the personal data which are submitted, as required by each call for tender, such as full name, financial information, such information on payments and the insurance of the employees by the contractor-employer, including the payment of salaries, bonuses, overtime, expenses and allowances which have been paid or agreed to be paid. Similarly, for this category of subjects, the Company shall provide, through their cooperator or the bidder, extra information on the processing of their data and their rights.

F. Lawfulness of processing of the personal data of the employees per category of subjects:

The processing of the personal data of the employees of the Company is based on the following legal bases:

- 1.** The processing associated with the assessment of bidders/subcontractors and their entering in the contract with the Company is necessary for the performance of the contract or the taking of measures at the request of the data subject prior to entering into this contract (article 6. paragraph 1b, GDPR)
- 2.** The processing of the data of members of boards of directors and the employees of the cooperators or bidders of the Company is necessary for the purposes of the legitimate interests pursued by the controller or by 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 (article 6, paragraph 1f, GDPR).

G. Retention period for personal data.

The above data shall be retained by the Company for the amount of time which is necessary for the assessment of the bidder, insofar they enter into a contract with the Company, for the period in which the contract is effective, whilst after the expiration of the contract, the processing of data shall continue to the extent where this is necessary for the fulfillment of the obligations of the Company towards services/third parties or for its protection against legal actions.

H. Personal data transfers.

We publish personal data insofar this is imposed by the law and insofar there are legal conditions for tender transparency purposes.

Additionally, to ensure that we comply with our legal obligations, we shall transfer personal data to fiscal or judicial authorities. Recipients of personal data can also be authorized employees of the Company, accountants, legal partners etc.



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The Company shall not transfer personal data outside the European Union or countries or international organizations for which the European Commission has declared that they do not offer an adequate level of protection. In the case of need for such a transfer, information shall be provided and the procedure specified by the GDPR shall apply.

I. Security of Personal Data:

The Company shall take the appropriate technical and organizational measures for the security of your personal data, to ensure the confidentiality of their processing and their protection against accidental or unlawful destruction/loss/alteration, unauthorized disclosure or access and any other form of unlawful processing. Furthermore, we are binding with non-disclosure agreements and confidentiality compliance obligations all persons who have access to or are processing personal data on our behalf.

While every effort is made to ensure the protection of personal data, the Company cannot guarantee the absolute safety of the data stored in its information system. In the case of personal data breach, the Company shall implement the procedures stipulated in legislation to ensure that such incidents are handled properly and that the associated risk has been dealt with effectively.

With CEO decision (33/2018), HEDNO implements the Information Security Management System (ISMS) pursuant to the requirements of ISO 27001:2013 which the information systems of the Company have been certified with. The ISMS includes the main security policy as well as individual policies and procedures which specify the measures taken for ensuring high-level information security, as per the standard.

J. Your rights as data subject.

- Right to information & access: You have the right to information about and access to your data as well as additional information regarding their processing.
- Right to rectification: You have the right to ask for the rectification, modification, completion and updating of your data.
- Right to erasure: You have the right to ask for the erasure of your retained personal data insofar this right is not subject to limitations pursuant to the applicable laws or any other limitations.
- Right to restrict processing: You have the right to ask for the restriction of the processing of your personal data when: (a) you contest the accuracy of your personal data, for a period enabling the controller to verify the accuracy of the personal data; (b) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims, and (d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override yours.



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- Right to object: You have the right to object, at any time, to the processing of your personal data under specific conditions as per the provisions of the law.
- Right to data portability: You have the right to receive your personal data in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transmitted directly to another controller. This right applies for data which you have provided and whose processing is carried out by automated means with your consent.
- Right to withdraw consent: You have the right to withdraw your consent, to the extent this was received for the purposes of the processing, at any time.

To exercise any of the above rights, please contact us at: dpo@deddie.gr

Right to file complaints at the Hellenic Data Protection Authority: You have the right to file a complaint at the Hellenic Data Protection Authority (www.dpa.gr), at any time. Call Center: +30 210 6475600, Fax: +30 210 6475628, E-mail: complaints@dpa.gr.

The Company undertakes to respond to Data Subject requests within 30 days and always without unjustified delay, in a comprehensive manner and by using the language which is comprehended by the data subject, mainly by electronic means, unless the data subject requests otherwise.

Please note that requests which do not meet the requirements of the applicable laws or the procedures of the Company, may have to be re-composed or may be rejected, particularly these requests that we believe are excessive or manifestly unfounded, and that certain personal data may be exempted from access, rectification and erasure requests and other laws and regulations.

However, according to the Hellenic Personal Data Protection Authority website, prior to exercising your above rights, you shall first contact the Data Controller (the Company) or the Company's Data Protection Officer, to ensure that every effort has been made to resolve the issue internally.

K. Communication

For more information on exercising the above rights and any other matter pertaining to the processing of personal data, please contact the Data Protection Officer at: data_privacy@deddie.gr ή dpo@deddie.gr