

CUSTOMER PERSONAL DATA PROTECTION POLICY OF EYDAP S.A.

EYDAP S.A., which is headquartered in Galatsi, Attica (156, Oropou Street), is bound by the provisions of the Regulation (EU) 2016/679 and the Greek legislation to its customers, by respecting their privacy and being vigilant to ensure the confidentiality and safety of their personal data.

The purpose of this privacy policy is to provide information regarding the nature of personal data collected by EYDAP S.A., the way these are processed (collection, storage, use, distribution), their protection means and the rights of the users against this process, which, in any case, is carried out in a reliable and transparent way.

In order to ensure the transparency of the collection, use and exchange of personal data as well as to disclose the purpose and means of processing, EYDAP S.A. provides its customers with the following information:

- ***Data Controller and Processing Purposes***

The company EYDAP S.A., as legally represented, water and sewerage services supplier, as the data controller has the right to proceed to the necessary customer personal data processing, solely for the purposes of implementing and supporting the water supply and/or sewerage contract between each party, as well as for the fulfillment of its contractual and legal obligations.

Customer personal data are collected from the customers themselves and are provided freely by themselves or by an authorised person.

Indicatively and not restrictively, EYDAP S.A. processes the personal data of its customers indicatively for the following purposes: conclusion of a water supply/sewerage contract, bill statements to mailing, communication with customers, customer data update, assignment of overdue debts to EYDAP Legal Services, telephone service, website management, SMS customer update, invoice issuing finalisation, bill cross-checking, request for special pricing, pricing of water theft, pricing of connection rights, forwarding of overdue payments from connection rights, bills reduction, debt allocation, record keeping of wrongly paid returns, water-metering, control and registration in the Company's system, complaints management, census purposes, ex-ante controls, management of requests for customers registration in the EYDAP website, cooperation with Committees for the evaluation of debt claims settlement, debts reduction, offering of special discounts, mail handling of EYDAP, mail records, water theft, customer pricing and costing etc.

- ***What information we collect and in which cases***

All personal data processed by EYDAP have been disclosed to it by the Subject itself or by a person authorised by the Subject, or as a result of a clearly publicly disclosed data or Public Authorities to which we have legitimate access for the purposes of connecting the sewerage of the property or of investigating the property ownership. (Municipalities, Land Registry, Cadastres etc.)

The personal data collected by EYDAP, within the context of its cooperation with customers, and their particular claims provided either before its Regional Customer Service Centers or its competent Departments, or through 1022 Call Center or at www.eydap.gr, as the case may be for the contract and the request made by you, are being aggregated and not per case, the following: name, surname, maiden name, ID number, VAT number, Tax Office, home address, district, zip code, telephone number, e-mail address, date and place of birth, form E9, form E1, copy of the lease, declaration of subject and/or owner in case of lessor, marital status certificate, tax clearing, commencement of occupation. In exceptional cases, e.g. the issuing of special tariffs (Law 4839/2016) or special discounts or special arrangements, we ask your Social Security Number (AMKA) and the KEPA disability certificate.

In the event that on your own initiative you submit supporting documents which include other categories of simple personal data or data of special categories, which are not provided for in the above paragraph, those are provided freely and with your explicit consent to the attached of the present request and will be co-submitted for processing as part of the above purposes.

EYDAP collects the following data online through the website 'eydap.gr' in the following cases - online services:

- i. *Online bill payment:* in the case of online payment, EYDAP S.A. does not keep your bank account number, but redirects you to the Bank of your choice
- ii. *Call Center 1022:* In the 'clicktocall' option we collect from you your name, telephone number, topic choice and time of communication with you and in the option of 'report a problem or malfunction' we collect a water supply or sewerage malfunction category, municipality, address, number, vertical street, district, name and surname, telephone number, email address, water meter number, water supply meter registration number and comments - description of the malfunction.
- iii. *Requests for Social Tariffs:* In case of a request for an extraordinary special tariff, we collect your VAT Number, your Social Security Number (AMKA) and, where appropriate, the KEPA certificate, whereas in the case of free concession/hospitality, an extra copy of the bill, a photocopy of ID or other proof of identity, as well as a copy of form E1 with the permanent residence address being visible, must be submitted.
- iv. *Requests for debts settlement:* we collect EYDAP registration number of the water supply meter, ID card number, VAT number, email and status as owner or tenant, as well as per case, we collect the attachments of copy of proof of identity, authorisation or proxy, statute or Government Gazette, recent form E9 or property contract, lease contract from taxisnet and signed declaration with the consent of the owner in the case of tenant.

v. *Correction of data*: EYDAP registration number of the water supply meter, water meter number, signed declaration, photocopy of ID card and per case the form E9, lease contract and/or relevant authorisation.

vi. *My water supply meters*: To sign up for the online services regarding the bill and consumption tracking service, EYDAP S.A. collects a declaration whereas for registration in the telemetry, it collects the company name, company VAT number, representative, name and surname, telephone number, email address and registration number of the water supply meters.

- ***What is the legal basis for the processing***

The legal basis for the processing of your data on behalf of the EYDAP S.A. is the water supply/sewerage contract and the contractual obligations arising from it, the compliance with the legal obligations of the Company, the public interest as well as any legitimate interests of the Company against which your rights are not overriding.

- ***Notification to third parties***

In special cases, customer information is also disclosed to third parties when necessary, such as entities and Public Authorities. In special cases (e.g. 1022, mail forwarding) customer information is disclosed and processed by third-party partners of the 'EYDAP S.A.' acting in the direction of the latter as processors, with which the Company is bound by contract which ensures the protection of the personal data in accordance with Article 28, paragraph 3 of the Regulation, such as, for example, companies that undertake the use and management of its IT systems, the communication with its customers, the mailing of bills and updates, the cooperation with whom is deemed necessary for the effective implementation of our relationship. You can learn more about the names of our associates upon relevant request.

- ***Retention of data***

The retention and processing of your personal data will take place throughout your contractual relationship with EYDAP and its individual contractual commitments depending on the nature of your request and for twenty (20) years after eliminating it in any way (e.g. transfer of property, change of lessor, termination of debt settlement, etc.), subject to the extension of the retention period in the event of any claim being made and for as long as it is maintained.

If your claim is accepted, the supporting documents you submit will be retained throughout your contractual relationship with EYDAP and its individual contractual commitments depending on the nature of your request and for twenty (20) years from any way of termination, subject to prolongation of the retention period in the event of any claim being made and for as long as it is retained. After the above period, these will be deleted in a non-recoverable manner.

In the occasion of your claim rejection, the supporting documents you submit will be retained for five (5) years from the notification of disapproval to you in order to safeguard the interests

of EYDAP in case of relevant claim revival by you, which after the expiration of five years will be deleted in a non-recoverable manner.

- ***Customer rights and rights exercise***

In any case, you have control over the processing of your personal data. In particular, the European Union's General Data Protection (GDPR) 2016/679 recognises and safeguards your following rights:

- ✓ The right to transparent information, announcement and arrangements for the exercise of your rights (Article 12, 13, 14 GDPR), i.e. your right to be informed on how your personal data is being used (as detailed in the Privacy Policy disclosed on the EYDAP website)
- ✓ Right to access (Article 15 GDPR) to personal data collected by you. Note that EYDAP S.A. will provide a copy of the personal data upon relevant request; however for any additional copies it reserves the right to charge a reasonable cost.
- ✓ Right to rectify (Article 16 GDPR) any inaccurate personal information.
- ✓ Right to deletion ("right to erasure") (Article 17 of the GDPR) of your data. The right to deletion - right to erasure cannot be applied to the extent that processing is necessary to comply with a legal obligation, for public interest purposes, to establish, exercise or support legal claims or archiving purposes, scientific or historical research or for statistical purposes on behalf of EYDAP S.A.
- ✓ Right to restrict the processing of your personal data (Article 18 GDPR)
- ✓ Right to oppose (Article 21 GDPR) in the processing of your personal data
- ✓ Right to withdraw your already granted consent (Article 7 of the GDPR), i.e. to withdraw your consent for processing being implemented under your consent at any time. The legitimacy of your data processing is not affected by the withdrawal of your consent until the time you requested the withdrawal.
- ✓ Right to file a complaint to the relevant supervisory authority, the Personal Data Protection Authority (1-3, Kifissias Avenue, Athens, zip code: 115 23, +30 210 6475600, contact@dpa.gr)

You have every right to exercise your rights by sending an e-mail to the e-mail address dpo@eydap.gr or by mail to 9, Ilission Street, Athens, zip code: 157 71, by completing the relevant rights exercise application form provided to you. You can find a relevant rights

exercise application form on the EYDAP website at www.eydap.gr and in the Regional Customer Service Centers of EYDAP.

Please, accompany your relevant requests with appropriate evidence of your identification, with EYDAP's explicit reservation to request additional information in order to identify and confirm your personal details.

- ***Technical and organisational measures***

The Company takes relevant precaution for the provision of adequate and necessary technical and organisational measures in order to safeguard both technological and physical security in accordance with Article 32, including encryption and regular testing, restricted access, camera installation in special locations, special codes in authorised people to access the database etc.) and respects the Principles of processing in accordance with the Regulation, i.e. the principle of legitimacy, objectivity and transparency, the principle of purpose limitation, the principle of data minimisation, the principle of accuracy, the principle of storage period limitation and the principles of integrity and confidentiality (Article 5). Driven by the aim to secure your privacy, we apply best practices to safeguard your personal data by implementing the necessary technical and organisational measures as they are defined in the GDPR. Data are secured from loss of availability, integrity and confidentiality of the information.

Lastly, we apply the Secure Sockets Layer protocol (SSL) with 128-bit strong encryption to the interactive websites (Your Account, Data Correction, Your Water meter, Telemetry), which ensures the confidentiality and inviolability of your transactions and personal information.

EYDAP is in constant harmonisation and compliance with the provisions of General Regulation (EU) 2016/679 regarding the protection of individuals against the processing of personal data and against the free movement of data and is constantly making every effort to comply with this.

- ***What happens if your data is being violated***

Despite due diligence applied by EYDAP S.A. regarding the processing of your personal data, it is prepared to deal timely with any violation in order to ensure your best possible assurance.

In the event of any violation of your personal data, you must notify EYDAP as soon as you become aware of possible violation of personal data, by disclosing the nature of the personal data violation. Indicative examples: 1) *Loss of mail or it being read by an unauthorised recipient*, 2) *Hacking*, 3) *Malicious software (e.g. virus, ransomware)*, 4) *Phishing email*, 5) *Publishing of data inadvertently*, 6) *Demonstration / allowance / transmission of wrong person data*, 7) *Oral dissemination of data inadvertently*.

Please, check whether the violation has occurred at your own risk and collect all necessary information that EYDAP will use to address the incident.

Contact details

Useful contact numbers:

A) Data Controller

EYDAP S.A.

Address: 156 Oropou Str.

Telephone number: 1022

E-mail: dpo@eydap.gr

B) Data Protection Officer (DPO):

Marianna Alboura

Phone number: + 30- 210 749 5155 & + 30-210 749 556

E-mail: dpo@eydap.gr

C) Hellenic Data Protection Authority

Office address: 1-3 Kifissias Avenue, 115 23, Athens

Call Center: +30-210 6475600

Fax: +30-210 6475628

E-mail: contact@dpa.gr

By reading this note, the customer is aware of the above processing, which is in accordance with Regulation 2016/679 and its reasoning, solely for the purposes stated above and for purposes compatible with them.