

## PRIVACY AND PERSONAL DATA PROTECTION POLICY

### For EDP Group Suppliers

#### 1. Scope of application

This Privacy Policy is addressed to natural persons who provide services or are Potential Suppliers to EDP Group companies based in Europe (hereinafter "EDP"), together with their employees, legal representatives and beneficial owners, hereinafter referred to as "Data Subjects", and refers to the processing of personal data of those Data Subjects by EDP in accordance with the General Data Protection Regulation (EU Regulation 2016 /679 of the European Parliament and Council of 27 April 2016 - "GDPR").

For the purposes of this Policy, "Suppliers" or "External Service Providers" ("ESP") means entities that provide or intend to provide goods and/or services or works to any EDP Group company.

#### 2. EDP Commitment

The EDP Group is committed to protecting the privacy of Data Subjects by protecting and securing their personal data, and in this context has drawn up this Privacy Policy to demonstrate its commitment in this respect.

#### 3. Suppliers' Responsibilities

The Data Subject or their legal representative should carefully read this Privacy Policy, which has been drafted in a clear and simple manner to facilitate its understanding.

The Data Subject or their legal representative warrants that the data communicated is true, accurate, complete and current, and is liable for any damage or loss, direct or indirect, that may arise as a result of breach of such obligation, and undertakes to rectify or update their personal data or to communicate the necessary changes to EDP whenever necessary.

If the data communicated to EDP belong to a third party, it is the responsibility of the person who communicates the data to ensure they are legally entitled to provide such data and to inform the third party of the conditions set out in this document and to ensure they are authorised to provide this data to EDP under the conditions and for the purposes indicated in this Policy.

#### 4. Data Controller

The following are responsible for the processing of personal data:

- **The EDP Group Company with which the Supplier has or intends to have a contractual relationship.** The identification of the companies in the EDP Group can be found in Annex I.
- **EDP Global Solutions – Gestão Integrada de Serviços, SA**, with the unique Commercial Registry registration and legal person number 505938022, with its registered office at Av<sup>a</sup> José Malhoa, n<sup>o</sup> 25, 1070-157 Lisbon, PORTUGAL

Each of the responsible parties identified above will process personal data for their own purposes and shall in no way act as joint controllers.

#### 5. Data Controller contact details

The Data Subject may contact any company in the EDP Group on any matter related to this Privacy Policy through the following contact points:

- By calling the EDP Global Solutions Customer Service Line on: **800 100 113**.
- Post:  
**EDP Global Solutions – Gestão Integrada de Serviços, SA**  
**Av<sup>a</sup> José Malhoa, 25**  
**1070-157 Lisbon, PORTUGAL**
- Suppliers Channel, via the EDP website (<https://www.edp.com/pt-pt/formulario-fornecedores>) or by calling: **210 016 333**.

## 6. Personal Data Processed

For their proper purposes, personal data processed shall be taken to mean all (i) data reported to EDP by the Data Subjects or by the entities they represent, through the different features available on the Suppliers page on the EDP corporate website, such as the Corporate Supplier Registration System, the Supplier Accreditation System, the PSE Accreditation System and the Suppliers Channel, via email or by post or any other means and all (ii) data collected by EDP from publicly available sources, including institutional sites.

Data collected from the previously described sources may belong to the following categories of personal data:

- Identification details;
- Contact details;
- Professional data;
- Educational data;
- Data resulting from the analysis of the presence in lists of sanctions, accreditation as a Politically Exposed Person (“PEP”) or association with persons qualified as PEP, adverse news, identification of ongoing legal proceedings or convictions and identification of any conflicts of interest;
- Banking and/or Fiscal data;

The data requested on the forms made available by EDP must be completed so the request for information and/or service by the Data Subject or their legal representative can be followed up, unless expressly indicated otherwise – for example, in cases where two or more data fields may have a similar function which allows them to fulfil the contractual or legally established purpose. Such data may be processed manually and/or automatically.

## 7. Purpose and Legal Basis of Data Processing

The **EDP Group company with which the Supplier has or intends to have a contractual relationship** or EDP Global Solutions – Gestão Integrada de Serviços SA, as subcontractor of the former, will process the Subjects' data for the following purposes:

- Registration of suppliers, risk analysis, monitoring of contract activity and identification of partner opportunities between the EDP Group and its partners;
- Examination of suppliers' bids under and outside the Public Procurement Code;
- Contract execution, liaison and management;
- Consultation and negotiation of insurance contracts;
- Dealing with invoices, particularly digitisation and processing, including financial settlement of invoices;
- Response to requests for information, clarification or doubts;
- The assignment of access credentials to buildings, spaces or other sites owned by EDP or in which EDP is active, or to EDP information systems, for the performance of the data subject's functions;

- Activities aimed at enhancing EDP's relationship with suppliers, such as surveys, events, training, webinars, among others;
- Application and equipment management and maintenance;
- Accreditation, recognition and evaluation of suppliers;
- Environmental, Social & Governance (ESG) audits.

The processing of personal data for those purposes is based on the contractual relationship with suppliers and the legal obligations associated with the transactions underlying that relationship.

Processing of personal data for the allocation of access credentials to buildings, spaces or other sites owned by EDP or in which EDP is active, or EDP information systems, is based on EDP's legitimate interest in protecting the security of persons and goods, as well as its information networks and systems.

The processing of personal data for the management and maintenance of applications and equipment is based on EDP's legitimate interest in the availability of its information systems.

The data may also be processed by the EDP Group company with which the Supplier has or intends to have a contractual connection or EDP Global Solutions – Gestão Integrada de Serviços, SA, as a subcontractor of the former, for the purpose of the Due Diligence procedure to assess the integrity of the third parties with which the Company has a relationship. In particular, efforts are made to identify:

- i) The presence on lists of international sanctions;
- ii) Qualification as a Politically Exposed Person (PEP) or possible association with persons classified as PEP;
- iii) The existence of references in terms of adverse media with potential negative reputational impacts for the EDP Group;
- iv) Involvement in ongoing legal proceedings and/or convictions, and
- v) Identification of any conflicts of interest.

The processing of personal data in the context of Due Diligence procedures is justified by: (i) compliance with legal obligations, in cases where EDP qualifies as an obliged entity under Law No. 83/2017 of 18 August (Money Laundering and Terrorist Financing Law), and is carried out for the purpose of preventing money laundering and terrorist financing; (ii) the pursuit of EDP's legitimate interests in ensuring the relationship with third parties that comply with internal integrity requirements and policies, and for this purpose a balancing test between EDP's legitimate interests and the rights and freedoms of data subjects is carried out. The Due Diligence procedure will not involve any decision taken solely on the basis of automated processing of personal data, but will always be dependent on a human decision and intervention.

**EDP Global Solutions – Gestão Integrada de Serviços, SA, as controller**, will process the Data Subjects' data for the following purposes:

- Replying to requests for information, clarification or doubts raised by data subjects with no contractual relationship with EDP.

The processing of personal data for that purpose shall be carried out at the request of the data subject to ensure the requests are answered.

## **8. Passing data to Subcontractors and Third Parties**

The data subjects' personal data may be passed to EDP Group companies in order to comply with the corresponding purposes of processing referred to in the previous paragraph, with the contractual commitment to process the personal data solely and exclusively for these purposes and in compliance with the requirements of the GDPR.

As a rule, EDP does not share the Data Subjects' personal data with third parties with whom it has not entered into a contractual relationship providing for the confidential processing of these data in accordance with EDP's privacy policy.

The processing of the Data Subjects' data may be carried out by suitable external service providers contracted by EDP on its behalf and on its account to fulfil the purposes for which the data are processed or part thereof, with the obligation to take the necessary technical and organisational measures to protect personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access or any other unlawful form of processing.

These service providers will process the data exclusively for the purposes established by EDP, on the basis of a contract or service provision agreement, in observance of the instructions issued by the latter for strict compliance with the legal regulations in force on the protection of personal data.

## **9. International Data Transfer (Outside the European Economic Area)**

The Data Subjects' personal data will preferably be processed by EDP within the European Economic Area (EEA). In cases where there is a need to transfer personal data outside the EEA and to a country that does not guarantee a level of protection equivalent to that of the European Union, EDP will make its best efforts to ensure that such transfers review the appropriate safeguards to make sure the level of protection for individuals is not compromised, as required by the applicable data protection rules.

If the Data Subject wishes to obtain further information on the processing of personal data outside the EEA, they can contact the Data Controller via the contacts in point 6 of this Privacy Policy.

## **10. Data Retention Period**

The personal data processed as part of the management of the contractual relationship are retained by EDP during the term of the contract plus the limitation and prescription periods of the associated rights, without prejudice to EDP being able to retain them beyond these periods to comply with legal obligations and for statistical purposes.

Personal data processed in the course of carrying out bill handling, in particular digitisation and processing, including financial settlement of bills, decision-support documents or decision-support evidence and data processed in connection with supplier qualification and recognition, shall be retained for 10 years.

Personal data processed in the course of the Due Diligence procedure will be retained by EDP, when the Company is an obliged entity under the Money Laundering and Terrorist Financing Law, for the periods of time defined, or in other cases for a period of 7 (seven) years after the end of the relationship between EDP and the Third Party, after which they will be deleted and/or anonymised.

The personal data processed in the course of the Due Diligence procedure will be retained by EDP on the basis of legitimate interest for a period of 5 (five) years after the end of the relationship between EDP and the Third Party, after which they will be deleted and/or anonymised. Data may be retained for longer periods if this is necessary for EDP to exercise rights or prove its compliance with obligations, in which case they may be retained for the period of limitation of the respective rights or the legally determined period, respectively.

Personal data processed for the allocation of access credentials to buildings, spaces or other sites owned by EDP or in which EDP is active, or to EDP information systems, as well as personal data processed for the management and maintenance of applications and equipment, shall be retained by EDP for the duration of the contract plus 1 (one) year after termination.

The data processed in the context of requests for information, clarification or doubts and their response, through the Suppliers Channel or service channels, will be retained for 1 (one) year.

## **11. Exercise of Rights by Data Subjects**

The Data Subject of personal data processed by EDP, or their legal representative, shall have the right of access, rectification, restriction, portability, erasure and the right to object to the processing of personal data in certain circumstances, which may be exercised in accordance with this chapter of the Privacy Policy:

**Right to information** – this means the Data Subject has the right to obtain clear, transparent and easily understandable information on how EDP uses their personal data and what their rights are.

**Right of access** – this means the Data Subject has the right to obtain information about the personal data EDP processes and certain information about how these data are processed. This right allows the Data Subjects to know and confirm that EDP processes their data in accordance with data protection laws. EDP may, however, refuse to provide the requested information when by doing so it must disclose the personal data of another person or the information requested prejudices the rights of another person.

**Right of rectification** – means the Data Subject has the right to ask EDP to take reasonable steps to correct incorrect or incomplete personal data.

**Right to erasure**, also known as the "right to be forgotten", means the Data Subject may request the erasure or deletion of their data, provided there are no valid grounds for EDP to continue to use them, or where their use is unlawful.

**Right to restriction of processing**, means the Data Subject has the right to have their data only processed, with the exception of data retention, as follows: **(i)** upon giving their consent or for the purpose of a declaration, exercise or defence of a right in legal proceedings, **(ii)** in defence of the rights of another natural or legal person, or **(iii)** for serious reasons in the public interest of the EU or of a Member State, while EDP evaluates a request for rectification or as an alternative to erasure.

**Right to data portability** means the Data Subject has the right to obtain and reuse certain personal data for their own purposes. This right shall apply only to personal data that have been supplied to EDP by the Data Subject directly, on the basis of a contract or consent and which are processed by automated means.

**Right to object** – this means the Data Subject has the right to object to certain types of processing, for reasons related to their particular circumstances, at any time during which such processing takes place.

**Right of complaint** means the Data Subject has the right to lodge a complaint with the competent supervisory authority, the National Data Protection Commission (CNPD), if they consider the processing carried out on the personal data infringes their rights and guarantees and, consequently, the applicable data protection laws.

The Data Subject may exercise their rights through the following channels:

- By calling the EDP Global Solutions Customer Service Line on: **800 100 113**.
- Post:  
**EDP Global Solutions – Gestão Integrada de Serviços, SA**  
**Av<sup>a</sup> José Malhoa, 25**  
**1070-157 Lisbon, PORTUGAL**
- Suppliers Channel, via the EDP website (<https://www.edp.com/pt-pt/formulario-fornecedores>) or by calling: **210 016 333**.

With regard to the processing of data for the purpose of preventing money laundering and terrorist financing under the Money Laundering and Terrorist Financing Law, the Data Subject may request access to their personal data and the rectification of any data that is imprecise or incomplete, as well as their erasure or restriction of processing, through the National Data Protection Commission, in accordance with and subject to the restrictions laid down in that Law.

If the requests submitted by the Data Subject or their legal representative are manifestly unfounded or excessive, in particular because of their repetitive nature, EDP may require payment of a fee taking into account the administrative costs of providing the information, communicating and taking the requested measures, or refuse to comply with the request.

In any event, the Data Subject will be informed that if they consider EDP to have infringed their rights, they have, under the applicable data protection law, the right to lodge a complaint with the National Data Protection Commission.

For any matter relating to this privacy policy, the Data Subject or their legal representative may also contact EDP's Data Protection Officer or DPO by email at [dpo.pt@edp.com](mailto:dpo.pt@edp.com). For E-Redes, please use the email address [dpo.edpdistribuicao@edp.com](mailto:dpo.edpdistribuicao@edp.com). For SU Eletricidade, please use the email address [dpo@sueletricidade.pt](mailto:dpo@sueletricidade.pt).

## **12. Security and Integrity**

The personal data will be processed by EDP for the purposes identified in this Policy, in accordance with EDP's internal policies and standards, and using technical and organisational measures designed according to the risks associated with the specific processing of personal data.

The technical and organisational measures set out will, to the maximum extent possible, ensure the security and integrity of personal data, in particular in relation to the unauthorised or unlawful processing of the personal data of the Data Subjects and their loss, destruction or accidental damage.

### **13. Privacy Policy Changes**

EDP reserves the right to partially or totally change, add to, or revoke this Privacy Policy at any time, without prior notice, with immediate effect and without prejudice to the legal rights granted to the Data Subjects. Any changes will be immediately disclosed through the existing communication channels.

This Privacy Policy was last updated on 14 November 2023.

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## ANNEX I – LIST OF EDP GROUP COMPANIES

- EDP – Energias de Portugal, SA.
- EDP – Gestão da Produção de Energia, S.A.
- E-REDES – Distribuição de Eletricidade, S.A.
- EDP Global Solutions – Gestão Integrada de Serviços, S.A.
- Labelec – Estudos, Desenvolvimento e Actividades Laboratoriais, S.A.
- EDP Comercial – Comercialização de Energia, S.A.
- SU ELETRICIDADE, S.A.
- EDP Gás – Serviço Universal, S.A.
- EDP Inovação, S.A.
- Fundação EDP
- Sãvida – Medicina Apoiada, S.A.
- EDP – Estudos e Consultoria, S.A.
- CNET – Centre for New Energy Technologies, S.A.
- EDP Internacional, S.A.
- Effizency, S.A.
- Greenvouga – Sociedade Gestora do Aproveitamento Hidroeléctrico de Ribeiradio–Ermida, S.A.
- Empresa Hidroeléctrica do Guadiana, S.A.
- TERGEN – Operação e Manutenção de Centrais Termoeléctricas, S.A.
- Enernova – Novas Energias, S.A.
- EOLISER
- IE2 Portugal
- Save to Compete, S.A.
- EDP GEM Portugal, S.A
- EDP Ventures – Sociedade de Capital de Risco, S.A.
- EDP VENTURES, SGPS, S.A.
- EDP Renováveis Portugal, SA
- FISIGEN–Empresa de Cogeração, S.A.
- EMPRESA HIDROELÉCTRICA DO GUADIANA, S. A
- EDP IS – Investimentos e Serviços, Sociedade Unipessoal Lda.
- Fundo Edp Cleantech Fcr
- Ocean Winds EDP Cross Solutions