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## **PRIVACY AND PERSONAL DATA PROTECTION POLICY for EDP Suppliers**

### **1. Introduction**

The General Data Protection Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 (GDPR) reinforces the rights of natural persons and requires organisations to protect their data.

With the GDPR entering into force on 25 May, 2018, EDP has the duty of informing data subjects how their data are processed.

### **2. Scope of application**

This Privacy Policy applies to suppliers of the EDP Group of companies headquartered in Europe and aims to protect the personal data of natural persons, including those related to employees and business partners of Suppliers, hereinafter referred to as "Data subjects".

Personal data is provided to EDP by suppliers in connection with the purchase of goods and/or the provision of external services through Websites, email or post or any other means of communication and registration.

### **3. EDP's commitment**

EDP is committed to protecting the privacy of data subjects, and to the protection and security of their personal data and, to this end, has drafted this Privacy Policy to demonstrate its commitment to and respect for the privacy and protection of personal data.

### **4. Entity Responsible for the Processing of Personal Data**

The entity responsible for processing the data subject's personal data is the company from the EDP group indicated below:

**EDP Valor - Gestão Integrada de Serviços, SA**, with the single Commercial Registry and legal person number 505938022, headquartered at Av. José Malhoa 25, 1070-157 Lisbon, PORTUGAL, with share capital of €4.550.000,00.

### **5. Contacts for the Party Responsible for Processing Personal Data**

The data subject may contact EDP on any matter related to this privacy policy, through the following focal points:

- EDP Valor Customer Support by phone at: 800 100 113.
- By post to:

[EDP Valor – Gestão Integrada de Serviços, SA](#)  
[Av. José Malhoa, 25](#)  
[1070-157 Lisbon, PORTUGAL](#)



## **6. Duties of Data Subjects**

The data subject or their legal representative must 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 information provided is true, accurate, complete and up to date, and accepts responsibility for any damage or loss, whether direct or indirect, that may emerge as a consequence of a breach of this obligation, also committing themselves to correct or update their personal data or communicate the required changes to EDP, whenever necessary.

If the data communicated belongs 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 their data to EDP under the conditions and for the purposes indicated in this Policy.

## **7. Responsibilities of Subcontractors**

The natural or legal persons that provide personal data about their employees or service providers to EDP as part of a service agreement will inform the data subjects that their data will be provided to EDP under the terms set out in Article 13 of the GDPR, in particular for the purpose, as well as its subjection to the obligation of secrecy, confidentiality and security when processing the data.

## **8. Data Processing Purposes and Legal Basis**

EDP will process the data subject's data collected through websites, platforms, email or postal mail communications, or any other communication and registration processes, for the management of activities related to the purchase of goods and services, for the following specific purposes:

- Environmental, Social & Governance Audits (ESG);
- Activities aimed at improving EDP's relationship with suppliers, particularly EDPartners and the recognition of suppliers;
- Consultation and negotiation of risk transfer contracts, for renewing or underwriting insurance;
- Access management, database maintenance processes and provision of technical support for computer applications/platforms;
- Proposals from suppliers within and outside the scope of the Public Procurement Code;
- Management of master data of suppliers, materials and services, involving the processing of personal data of third-party suppliers and the EDP Group's internal and external entities;
- Qualification, recognition and evaluation of suppliers of products, services or undertakings for contracting supplies, services or undertakings by EDP Group's Business Units;
- Registration, analysis and management of suppliers;
- Processing of invoices, namely their digitalisation and processing, including financial settlement of invoices;
- Evaluation of the quality of goods and the provision of services.

The processing of personal data for said purposes is based on the contractual relationship maintained with suppliers and partners, as well as the legal obligations associated with the operations underlying this relationship.



Providing the data requested in the forms supplied by EDP is mandatory in order to fulfil requests for information and/or services by the data subject or their legal representative, except where two or more data fields may have a similar function, in order to fulfil the contractual or legally established purpose. Such data may be processed manually and/or mechanically.

## **9. Communication of Data to the Group's Companies**

The data subject's personal data may be communicated to the EDP Group of companies in order to comply with the corresponding reasons for processing referred to above, which contractually commit to processing this personal data solely and exclusively for these purposes and respecting the requirements of the GDPR.

## **10. Communication of data to Third Parties and Subcontractors**

As a rule, EDP does not share personal data with third parties with whom it has not established a contractual relationship that provides for the confidential treatment of this data in accordance with the EDP privacy statement.

The data subject's data may be processed by suitable service providers hired by EDP to perform, for and on behalf of EDP, for the purposes of processing all or part thereof, with the obligation to adopt the necessary technical and organisational measures in order to protect personal data against accidental or unlawful destruction, accidental loss, alteration, dissemination or unauthorised access or any other form of unlawful treatment.

These service providers will process the data exclusively for the purposes established by EDP, based on a contract or service agreement, in accordance with the instructions issued by EDP to ensure strict compliance with the regulations in force for the protection of personal data.

## **11. Transfer of Personal Data to third countries (outside the European Economic Area)**

Where the processing of personal data involves their communication to third parties operating in countries outside the EEA, EDP shall ensure that it receives adequate guarantees for how the personal data is processed, taking into account the risk of the data subject being exposed.

More specifically, international data transfers to the United States will be based on an appropriate decision by the European Commission, which establishes the Privacy Shield principles, according to which organisations that receive data are recognised for guaranteeing a suitable level of protection.

Where there is no appropriate decision by the European Commission, international data transfers to a third country, in particular to countries outside the EEA, in which an EDP Group company is located, will be made within the framework of the implementation of a contract.

## **12. Retention Period**

The length of time during which data is stored and retained varies depending on the purpose for which the information is processed and in accordance with the applicable laws and obligations. Where there is no specific legal obligation, the data may be kept only for the minimum time necessary for the purposes that led to it being collected and processed, following which it will be deleted.

## **13. User Rights**



Data subject or its legal representative, has the right of access, rectification, restriction, portability and deletion, as well as the right to object to the processing of personal data in certain circumstances, which may be exercised under the terms and conditions set forth by this section of the Privacy Policy:

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

**Right of access** means the data subject has the right to obtain information about the personal data processed by EDP and certain information about the way such data is processed. This right allows the data subject to be aware of and confirm that EDP processes their data according to data protection laws. EDP may, however, refuse to provide such information whenever the request implies disclosing someone else's personal data or whenever the requested information damages the rights of another person.

**Right to rectification** means that the data subject has the right to ask EDP to take reasonable steps to correct their inaccurate or incomplete personal data.

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

**Right to restriction of processing**, means that the data subject has the right to block or prevent further processing of their data, with the exception of its preservation, by consent, or for the purposes of declaration, exercise, or defence of a right in a legal proceeding, or for defending the rights of another natural or legal person, or for weighty reasons of public interest within the Union or a Member State, while EDP assesses requests 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 applies solely to personal data which has been directly provided to EDP by the data subject based on an agreement or permission, and which EDP processes by means of automated mechanisms.

**Right to object** means that the data subject has the right to object to certain types of processing, due to their specific situation, at any time during said processing.

**Right to complain** means the data subject has the right to complain to the relevant supervisory authority, the Comissão Nacional de Protecção de Dados (CNPd), if they believe the processing of their personal data has violated their rights and/or applicable data protection laws.

The data subject may exercise their rights by using the following channels:

- EDP Valor Customer Support by phone at: 800 100 113 or
- By post:  
[EDP Valor – Gestão Integrada de Serviços, SA](#)  
[Av José Malhoa, 25](#)  
[1070-157 Lisbon, PORTUGAL](#)



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If the requests made 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 reasonable fee that takes the administrative costs of supplying the information, of communications and of the requested measures, or may refuse to comply with the request.

In any case, the data subject shall be informed that if they believe EDP has violated their rights under the applicable data protection legislation, they may lodge a complaint with the suitable Control Authority.

For any queries related to this privacy policy, the data subject, or their legal representative, may contact EDP's Data Protection Officer (DPO) by email at: [dpo.pt@edp.com](mailto:dpo.pt@edp.com).

#### **14. Security and Integrity**

Personal data will only be processed by EDP in the context of the purposes described in this Privacy Policy, pursuant to the policies and internal rules of EDP, and using technical and organisational measures designed to address the risks associated with the specific processing of personal data.

To the maximum extent possible, these technical and organisational measures ensure the security and integrity of the subject's personal data, in particular with regard to unauthorised or unlawful processing, loss, destruction, or accidental damage.

#### **15. Changes to the Privacy Policy**

EDP reserves the right to change, expand or repeal this Privacy Policy, in whole or in part, at any time, without prior notice and with immediate effect, but without prejudice to the data subject's legal rights. Any changes will be immediately announced via the usual communication channels.

This Privacy Policy was last updated on 6 August 2018.