

## Privacy Policy

Privacy policy pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR") and the Privacy Code

### Data Controller

Open Power Grids Association, with registered office in Rome, via Mantova 24, fiscal code No.96533350581 ("**OPG**" or the "**Controller**"), as the Data Controller, will process your Personal Data in accordance with the provisions of the applicable Personal Data protection legislation and this notice.

### Data processed and method of processing

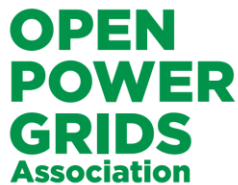
The Controller will process your personal data ("**Personal Data**") communicated by you or lawfully obtained by the Controller, for example through the **Open Power Grids** portal ("**Portal**") or within the relationship with the company or organization you belong to. Specifically, the following data can be processed:

Contact Data: such as name, surname, country, e-mail, SAP id e-mail, telephone number (optional), role and company or organization you belong to. The processing of this data is necessary to identify you as the reference person of the company/organization, to communicate with the company/organization and to allow the collaboration between the participants of the Open Power Grids initiative.

Navigation data: the IT and electronic communications systems and software procedures put in place to allow the Website to function, will, in the course of their normal work, collect certain data (e.g. access date and time, pages visited, name of the Internet Service Provider and Internet Protocol (IP) address you use to access the internet, the internet address from which you connect to our Portal, etc.), the transmission of which is implicit in the use of web communications protocols or is pertinent to effective management or optimisation of the data or email sending system.

Cookies: technical cookies and cookies comparable to technical ones, to assure the proper functioning of the Portal.

In the context of this privacy policy, Personal Data processing refers to any operation or group of operations carried out using automated processes and applied to Personal Data, such as collection, recording, organisation, structuring, conservation, adaptation or modification, extraction, consultation, use, communication through transmission, dissemination or any other available means, comparison or interconnection, restriction, erasure or destruction.



Please be informed that this Personal Data will be processed manually and/or using IT or electronic support.

### **Purposes and legal bases of processing**

The purposes of processing of your Personal Data and its legal basis are described in the following table

<b>Purposes of processing</b>	<b>Legal basis</b>
To allow the participation to the Open Power Grids initiative, using the Portal in all its functionalities, in particular to register and use the restricted area, pursuant to the Terms and Conditions of the Portal, which regulate the collaboration between the subscribers of the Open Power Grids initiative.	Performance of a contract
To check that the Portal is functioning correctly	Performance of a contract
To establish responsibility in the case of cybercrime that has caused damage to the Website; the detection, prevention, mitigation or verification of fraudulent or illegal activities relating to the services provided on the Website; the performance of security controls required under law.	Legitimate interest
To send communications relating to the initiative Open Power Grids and similar initiative or events	Performance of a contract, Legitimate interest
To respond to a query or a request from the Data Subject	Implementation of pre-contractual measures adopted at the request of the Data Subject

The identification and contact data are necessary to use the Portal. If you refuse to provide such data you won't be able to register to it.

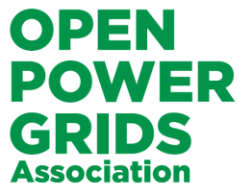
### **Recipients of Personal Data**

Your Personal Data may be made accessible for the abovementioned purposes, to:

- a) employees and staff of the Controller who, for that purpose, have been tasked with data processing, or to Enel Group companies in the European Union for the implementation of organisational, administrative, financial and accounting activities.
- b) to third party companies or other subjects to which the Controller outsources activities, in their role as external Data Processors.

### **Transfer of Personal Data**

Your Personal Data will be processed within the European Union and stored on servers located within the European Union. The same data may be processed in countries outside the European Union, provided that an adequate level of protection is guaranteed, recognized by a specific adequacy decision of the European Commission.



Any transfers of Personal Data to non-EU countries, in the absence of a European Commission adequacy decision, will only be possible if Data Controllers and Data Processors involved provide adequate guarantees of contractual nature, including Binding Corporate Rules and Standard Contractual Clauses.

The transfer of your Personal Data to third countries outside the European Union, in the absence of an adequacy decision or other appropriate measures as described above, will be made only if you have explicitly consented to it or in the cases provided for by the GDPR and will be processed in your interest. In these cases, we inform you that, although the Enel Group adopts operating instructions common to all the countries in which it operates, the transfer of your Personal Data may be exposed to risks related to the peculiarities of local legislation regarding the processing of Personal Data.

#### **Period of retention of Personal Data**

The Personal Data being processed for the abovementioned purposes will be conserved in observance of the principles of proportionality and necessity and, in any case, until the purposes of the processing have been achieved.

In particular, your contact and identification data will be stored until the Open Power Grids initiative will be active, until your account will be disabled or until the Portal will be closed, notwithstanding any further processing activity necessary to comply with legal obligation of pursue a legitimate interest of the Controller.

#### **Data subject rights**

Pursuant to Articles 15 to 21 of the GDPR, in relation to the Personal Data provided, you have the following rights, when applicable:

- access them and request a copy;
- request amendment;
- request cancellation;
- obtain processing limitation;
- oppose processing;
- receive your data in a structured, commonly used and machine-readable format

For more information relating to your Personal Data or to exercise your rights, you can write to the e-mail address [openpowergrids@enel.com](mailto:openpowergrids@enel.com), indicating in the header of the e-mail “*Open Power Grids – Data Protection request*”

You also have the right to submit a complaint to the Italian Data Protection Authority, with its office in Rome, Piazza Venezia, 11, Tel. (+39) 06.696771 and certified electronic mail address [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)