

DATA RETENTION POLICY

INTRODUCTION

Enaon is dedicated to the effective and secure management of data, ensuring compliance with all legal and regulatory requirements. This Data Retention Policy outlines the Company's approach to data retention and disposal, emphasizing the importance of retaining data only for the necessary duration and upholding the privacy and security of personal data.

ABBREVIATIONS

GDPR: General Data Protection Regulation

DPO: Data Protection Officer

DEFINITIONS

Personal data: Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special categories of personal data: Personal data which by nature are particularly sensitive in relation to fundamental rights and freedoms and which reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health data, sexual life or sexual orientation.

Processing: Any operation or set of operations which is performed on personal data or on sets of 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 subject: Any individual who is the subject of personal data processed by Enaon, such as employees or customers.

Data controller: 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; where the purposes and means of such processing are determined by union or member state law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data processor: A natural or legal person, public authority, agency or another body which processes personal data on behalf of the Data Controller.

Third party: A natural or legal person, public authority, agency or 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.

Consent: Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to the data subject.

Pseudonymization: The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Anonymization: To process a collection of personal data or information such that a natural person cannot be identified based on the output collection of data or information.

Corporate Document / Record: Any text or file that contains personal data stored in any medium, in digital or printed form.

Retention Period: Refers to the period for which data is retained prior to its destruction or deletion and concerns both electronic and hard copies, regardless of the storage medium.

Data Protection Legislation: All European Union laws and regulations, as applicable, along with any data processing orders and guidelines issued by competent EU authorities protecting the fundamental rights and freedoms of individuals, and particularly their right to privacy with respect to the Processing of Personal Data.

Supervisory Authority: Refers to the independent public authority for the protection of personal data, which has been established by an EU member state in accordance with the Regulation.

SCOPE

The scope of this Policy applies to all data managed by Enaon, including data stored on systems and media owned, leased, or provided by the Company, regardless of the data's physical or electronic location.

PRINCIPLES OF DATA RETENTION

The Storage Limitation principle under Article 5(1)(e) of the GDPR, states that personal data shall be “kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed [...] subject to implementation of the appropriate technical and organizational measures required [...] in order to safeguard the rights and freedoms of the data subject”.

Under the principle of storage limitation, the Company determines a plan of the retention period per each category of personal data it collects and processes.

The categories of data subjects and personal data processed and retained by the Company may be (as further described in detail in the Annex – Data Retention Schedule) employee, candidate, legal representative, shareholder, customer, client, platform user, website user, supplier, vendor, visitor, and third-party data, as well as electronic communication, log files, and physical access records.

The retention period for each category of personal data is determined based on the period needed to fulfill the purposes for which the data is processed, as well as on business needs, contractual obligations, legal claim limitation periods, and legal retention requirements.

In the event that Enaon transfers personal data to third parties, including but not limited to data processors and joint controllers, it is imperative that the measures to be taken regarding the personal data after the expiration of the agreed retention period are established in advance. These measures should include, for example, the deletion or return of all personal data to Enaon, as well as the destruction of any existing copies, unless otherwise required by law or agreed upon in writing.

Enaon employees must not disclose or use confidential personal data from external sources. Inadvertently received confidential information should be returned or securely deleted to maintain confidentiality and data protection compliance.

RETENTION PLAN COMPLIANCE REVIEW

Enaon should review retained data upon reaching the end of its retention period and securely destroying it if it is no longer necessary, considering any legal obligations that may dictate an extension.

In order to review the compliance with the retention plan Enaon should perform periodic reviews at planned intervals in order to identify potential cases where the data retention has lapsed.

DATA DELETION / DESTRUCTION

When the data retention has lapsed, Enaon should securely delete data or dispose / destroy information assets that include data in a way that information cannot be recovered to minimize the risk of confidential information leakage to unauthorized parties.

The method used for data deletion information assets disposal / destruction must depend on the type of information asset and the classification of data that are processed.

Such methods may include software-based data wiping, degaussing, data purging, physical destruction, shredding, incineration, pulping etc.

The deletion, disposal / destruction must be performed either internally via authorized employees or externally by trusted third party service providers. In case third party

service providers perform the deletion, disposal / destruction, a signed declaration of secure deletion, disposal / destruction must be requested by Enaon.

ANONYMIZATION OF PERSONAL DATA

As an alternative of data deletion, Enaon may opt to anonymize personal data. This process involves altering the data to such an extent that the individual data subject becomes unidentifiable, using advanced and effective anonymization techniques.

The anonymization techniques are held to stringent standards to prevent data from being linked to an individual or group, or personal characteristics being inferred from the data.

In order to determine the effectiveness of the anonymization, Enaon should assess the potential for re-identification by considering all conceivable methods that might be employed.

EXCEPTIONS

In case of a specific need, personal data may be retained for a longer period than the specified retention period following a decision by the DPO and the Legal Division for the following purposes:

- For the establishment, exercise, or defense of legal claims or third parties.
- For the protection of the vital interests of the data subject or another person.
- For compliance of the Company with a legal obligation.
- In accordance with an explicit directive from a competent public authority.
- For purposes of scientific or historical research or for statistical purposes.

The exceptional retention of personal data beyond the specified retention period should be limited only to the period necessary for the relevant processing purposes, and only in relation to processing that is necessary for these purposes and the justification of the decision should be documented.

In cases where deletion is not possible e.g. for data included in backup files, compensating technical and organizational controls such as encryption and strict access controls should be implemented.

Athens, 31 October 2024

THE CHIEF EXECUTIVE OFFICER

Barbara Morgante

ANNEX: DATA RETENTION PLAN

The following table refers to Enaon’s defined retention plan for the personal data processed during business operations. Appropriate processes shall be established in order to ensure the relevant retention periods are respected in the context of the storage limitation principle of GDPR.

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Chief Executive Officer (CFO)				
Accounting & Financial Services (ACC& FINSE)	<p>Name: Management of Overdue Liabilities</p> <p>Description: Collecting, storing, and managing personal data necessary for the identification of overdue liabilities, managing the overdue accounts, communicating with the customers about their liability, implementing debt collection strategies, and keeping a record of the actions taken for future reference and auditing purposes.</p> <p>Purpose: Identify, manage and pursue collection of overdue financial liabilities.</p>	5 years	Erasure of data	Greek Civil Code art. 250.
Accounting & Financial Services (ACC& FINSE)	<p>Name: Fulfilling Audit Obligations</p> <p>Description: Collection, storage, and use of personal data and financial data as required for conducting regular audits of annual financial statements.</p> <p>Purpose: Compliance with financial audit obligations.</p>	20 years	Erasure of personal data	Compliance with the current legislative framework
Accounting & Financial Services (ACC& FINSE)	<p>Name: Implementing Accounting Tasks</p> <p>Description: Collecting, storing, and processing personal and financial data to perform core accounting functionalities including</p>	5 years upon the end of the year during which the transaction was performed or the	Erasure of personal data	Greek Civil Code art. 250.

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>payments of suppliers, maintaining account ledgers and associated tasks.</p> <p>Purpose: Management of financial operations.</p>	obligation was marked as overdue.		
Accounting & Financial Services (ACC& FINSE)	<p>Name: Management of Employees' Expenses</p> <p>Description: Collection, storage, and use of employee personal data, along with the substantiating financial data related to expenses incurred by employees in the course of their work.</p> <p>Purpose: Process and reimbursement of employee expenses</p>	During the employment relationship + 5 years	Erasure of personal data	Art. 250 Civil Code
Accounting & Financial Services (ACC& FINSE)	<p>Name: Sales of Company's Assets</p> <p>Description: Collecting, storing, and processing personal data related to the sale of the company's tangible assets, such as laptops and mobile phones, maintaining accurate records of such sales, managing financial transactions related to the sale and ensuring compliance with applicable laws and regulations.</p> <p>Purpose: Management of the Sales of Company's Assets</p>	5 years	Erasure of personal data	Greek Civil Code art. 250
Tax Services (TAXSE)	<p>Name: Issuance of Tax Compliance Certificates</p> <p>Description: Collection, storage, and use of personal data and financial data as required for issuing tax compliance certificates.</p> <p>Purpose: Compliance with financial audit obligations</p>	10 years	Erasure of data	Compliance with the current legislative framework (art. 36 Law. 4174/2013)
Tax Services (TAXSE)	<p>Name: Fulfilling Tax Obligations</p> <p>Description: Collection, storage, and management of necessary financial and personal data to fulfill tax obligations and maintain compliance with tax laws while meeting responsibilities concerning</p>	10 years	Erasure of data	Compliance with the current legislative framework (art. 36 Law. 4174/2013)

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	tax payments and reporting and maintaining accounting and tax records. Purpose: Compliance with tax obligations.			
Human Resources & Organization (HRO)				
Human Resources & Organization (HRO)	Name: Recruitment of New Employees Description: <ul style="list-style-type: none"> - Manage the CVs of potential employees. - Communicate with potential employees candidates and arrange the interview. Purpose: Selection and evaluation of potential employees.	<ul style="list-style-type: none"> - During the evaluation of the potential employees or their employment relationship in case they are hired. - 24 months or more (based on the candidates' decision). 	Erasure of personal data	Not applicable.
Human Resources & Organization (HRO)	Name: Hiring of Employees Description: Communicate with new employees, send and receive signed offers and contracts of employment, enter the information of new employees into HR systems and prepare the onboarding process of new employees. Purpose: Conclude to a contract of employment with new employees.	During the employment relationship + 20 years	Erasure of personal data	<ul style="list-style-type: none"> - Art. 250 Civil Code - Art. 914, 937 Civil Code
Human Resources & Organization (HRO)	Name: Termination of Employment Relationship Description: Manage termination of employment, including the exit process, the exit interview and the return of any Organization's	20 years after termination of employment	Erasure of personal data	<ul style="list-style-type: none"> - Art. 7 Law.3762/2009 - Art. 6 Law 3762/2009

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>equipment (e.g., mobile phone, laptop, etc.) that employees may have in their possession.</p> <p>Purpose: Manage and document the termination of employment in a manner that complies with relevant labor laws and regulations, respects the rights of the employee, and protects the company's interests and assets.</p>			<ul style="list-style-type: none"> - Art. 657 & 658 Civil Code - Art. 2 N.Δ. 515/1970 - 914 Civil Code - Art. 250 Greek Civil Code - Art. 6 L. 4997/2022
Human Resources & Organization (HRO)	<p>Name: Employee Time Tracking</p> <p>Description: Record and monitor the working hours of employees via personalized access cards.</p> <p>Purpose: Accurately monitor and record employees' working hours to ensure proper compensation and comply with relevant labor laws and regulations.</p>	During the employment relationship	Erasure of personal data	<ul style="list-style-type: none"> - Art. 250 Civil Code - Art. 914, 937 Civil Code
Human Resources & Organization (HRO)	<p>Name: Management of Employees' Payroll</p> <p>Description: Maintain up-to-date employee records, tax deductions and insurance premiums, handle payroll discrepancies, process of overtime payments as well as ensure compliance with labor laws.</p> <p>Purpose: Accurate and timely payment of the employees' salary, bonuses and deductions, in accordance with contractual agreement and legal obligations.</p>	10 years	Erasure of personal data	According to Art. 6(1) L. 4997/2022
Human Resources & Organization (HRO)	<p>Name: Management of employment relationship</p> <p>Description: Collection, storage and transmission of personal data necessary for the ongoing management of the employment relationship in order to facilitate communication with employees, manage and resolve conflicts, provide assistance etc.</p>	During the employment relationship + 20 years	Erasure of personal data	<ul style="list-style-type: none"> - Art. 7 Law.3762/2009 - Art. 6 Law 3762/2009 - Art. 657 & 658 Civil Code

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>Purpose: Maintain a constructive, compliant, and efficient relationship with employees.</p>			<ul style="list-style-type: none"> - Art. 2 N.Δ. 515/1970 - 914 Civil Code - Art. 250 Greek Civil Code - Art. 6 L. 4997/2022
Human Resources & Organization (HRO)	<p>Name: Provision of Leaves</p> <p>Description: Accept or reject leave requests, verify their legitimacy, record leave duration, and ensure that this information is accurately reflected in the payroll.</p> <p>Purpose: Management of employees leaves (annual leave, sick leave, marriage leave, maternity leave etc.) and provision of leaves in accordance with legal obligations.</p>	During the employment relationship	Erasure of personal data	According to Art. 6(1) L. 4997/2022
Human Resources & Organization (HRO)	<p>Name: Provision of Benefits</p> <p>Description: Collection, storage, and management of personal data necessary for the enrollment to and administration of benefits to employees (medical plans, savings plan, insurance plan, meal voucher program etc).</p> <p>Purpose: Provision of benefits to employees</p>	Until the withdrawal of the Subject's consent, otherwise During the employment relationship	Erasure of personal data	According to Art. 6(1) L. 4997/2022
Human Resources & Organization (HRO)	<p>Name: Training of Employees</p> <p>Description: Collection, storage, and analysis of personal data related to the training and professional development activities undertaken by employees in order to manage and track employee training, identify skills gaps, plan for future training requirements.</p> <p>Purpose: Manage the participation of employees in professional development and training programs.</p>	Until the withdrawal of the Subject's consent, otherwise During the employment relationship	Erasure of personal data	<ul style="list-style-type: none"> - Art. 250 Civil Code - Art. 914, 937 Civil Code

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Human Resources & Organization (HRO)	<p>Name: Evaluation of Employees <i>[processing activity not currently performed]</i></p> <p>Description: Collection, storage, and analysis of personal data related to the job performance of employees in order to evaluate employee performance, identify areas for improvement, determine suitability for promotion or bonuses.</p> <p>Purpose: Assessment of the performance of employees.</p>	20 years	Erasure of personal data	<ul style="list-style-type: none"> - Art. 250 Civil Code - Art. 914, 937 Civil Code
Human Resources & Organization (HRO)	<p>Name: Storage of Company Doctor's Archive</p> <p>Description: Maintain individual medical records of the employees (access only by the occupational doctor). The Occupational Doctor issues and shares the certificates of job qualification to the Organization.</p> <p>Purpose: Health and safety in the workplace.</p>	20 years	Erasure of personal data	<ul style="list-style-type: none"> - Art. 14 and 17 L. 3850/2010 - Art. 14 § 4 L. 3418/2005
Human Resources & Organization (HRO)	<p>Name: Notification and Investigation of Work Accidents</p> <p>Description: Collection, storage, analysis, and sharing of personal data related to workplace accidents in order to support the employees, to identify and rectify potential hazards in the workplace to prevent future accidents, and to comply with health and safety regulations which require reporting of workplace accidents.</p> <p>Purpose: Health and safety in the workplace.</p>	10 years	Erasure of personal data	<ul style="list-style-type: none"> - Art. 43(2b) L. 3850/2010 - Law 551/1915 (physical damage) - Civil Code 932, 937 (moral damage)
Human Resources & Organization (HRO)	<p>Name: Management of Personal Protection Equipment</p> <p>Description: Collection and storage of data related to the employees to whom personal protection equipment in order to verify that each employee has the appropriate safety equipment as</p>	No retention period	Erasure of personal data	Not applicable

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>required for their role, to manage inventory, and to comply with workplace health and safety regulations.</p> <p>Purpose: Provision of required personal protection equipment.</p>			
Human Resources & Organization (HRO)	<p>Name: Management of Organizational Structure</p> <p>Description: Collection, storage and periodic update of data related to the company's workforce and its structure including the employees CVs.</p> <p>Purpose: Maintenance of an up-to-date record of the company's organizational structure and employee profiles.</p>	No retention period	Erasure of personal data	Not applicable
Human Resources & Organization (HRO)	<p>Name: Teleworking</p> <p>Description: Collection, storage, and management of personal data needed for providing and monitoring teleworking.</p> <p>Purpose: Provision and management of remote working.</p>	During the employment relationship	Erasure of personal data	Civil Code 914
Legal Services (LEGAL)				
Legal Services (LEGAL)	<p>Name: Support of Corporate Bodies</p> <p>Description: Legal Record Keeping (legal archive, Minutes of Meetings (MoMs) of the General Assemblies (GAs), Board of Directors (BoD), Committees, Company's books, Shareholders' data etc.).</p> <p>Purpose: Ensuring Corporate Governance.</p>	No retention period	Not applicable	Not applicable
Legal Services (LEGAL)	<p>Name: Legal Representation</p> <p>Description: Legal representation of the Company.</p>	20 years after termination of the representation.	Erasure of data	- Common practice - Art. 249 CC

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Purpose: Ensuring Corporate Governance.			
Legal Services (LEGAL)	<p>Name: Dispute Resolution</p> <p>Description: Judicial cases management.</p> <p>Purpose: Ensuring judicial representation and dispute resolution between the organization and its customers/other parties.</p>	<p>Until the lapse of 20 years from the issuance of a final and irrevocable court decision, or</p> <p>Until the completion of the enforcement of the final and irrevocable court decision, or</p> <p>Until the lapse of the limitation period (within the litigation period), in accordance with the provisions of Greek Procedural Code.</p>	Erasure of data	<ul style="list-style-type: none"> - Common practice - Storage Limitation [Art. 5(1) point (e) GDPR] - Art. 249 CC
Legal Services (LEGAL)	<p>Name: Third-Parties Management</p> <p>Description: Implementation of tender procedures, Review of contracts with third parties.</p> <p>Purpose: Contract drafting, review and execution.</p>	During the contractual agreement + 5 years.	Erasure of personal data	<ul style="list-style-type: none"> - Common practice - Storage Limitation [Art. 5(1) point (e) GDPR]
Legal Services (LEGAL)	<p>Name: Compliance & Anti-Corruption Management</p> <p>Description: Anticorruption procedures in order to ensure implementation of Company internal reporting policy for whistleblowing and harassment.</p>	No retention period.	Not applicable	<ul style="list-style-type: none"> - Common practice - Storage Limitation [Art. 5(1) point (e) GDPR]

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Purpose: Ensuring compliance with the current regulatory framework (Whistleblowing Law 4990/2022 & Harassment Law 4808/2022).			
Data Protection Officer (DPO)	Name: Data Subjects Requests Management Description: Handle and fulfill data subjects' requests to exercise their rights under the General Data Protection Regulation (GDPR). Purpose: Management of data subjects requests.	For as long as is necessary for the purposes for which the personal data are processed	Erasure of data	- Art. 5 of General Data Protection Regulation - Art. 45 of Law 4624/2019
Data Protection Officer (DPO)	Name: Management of Requests and Complaints from Authorities Description: Handle and fulfill requests and complaints received from Authorities, e.g. from the Data Protection Authority. Purpose: Management of requests and complaints received from Authorities	For as long as is necessary for the purposes for which the personal data are processed	Erasure of data	- Art. 5 of General Data Protection Regulation - Art. 45 of Law 4624/2019
Procurement (PROC)				
Procurement (PROC)	Name: Tender management and evaluation Description: Collection, storage and use of tender applications and proposals from vendors, including opening and evaluating the submitted bids in cooperation with the interested Division, awarding the project and notifying the winning vendor. Purpose: Oversee and assess tender applications for the procurement of services, hardware, software etc.	- During the evaluation of potential vendors + 5 years upon the termination of evaluation. - During the contractual agreement + 5 years in case the vendors are selected	Erasure of personal data	- Art. 250 Civil Code - Art. 914, 937 Civil Code - Art. 36(2) L. 4174/2013 as applicable
Procurement (PROC)	Name: Vendor Contract Management	During the contractual agreement + 5 years	Erasure of personal data	- Art. 250 Civil Code - Art. 914, 937 Civil Code

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>Description: Collecting, sharing and storing signed contracts with vendors.</p> <p>Purpose: Supervise, document, and administer the signing and ongoing management of contracts with vendors.</p>			- Art. 36(2) L. 4174/2013 as applicable
Procurement (PROC)	<p>Name: Vendor Reputation Review</p> <p>Description:</p> <ul style="list-style-type: none"> - Collection and evaluation of personal and non-personal data related to vendors to conduct a comprehensive review of their reputation and operational practices, including information on a vendor's business practices, financial health (including credit ratings), sustainability efforts, ESG scores, and any public records or reports related to their reputation and operations. - Development of a register of vendors that meet specific predefined criteria on the aforementioned areas. <p>Purpose:</p> <ul style="list-style-type: none"> - Evaluate operational controls, sustainability metrics, ESG (Environmental, Social, and Corporate Governance) standards, and credit status of vendors to ensure their alignment with the company's values, ethical standards, and financial risk management. - Manage and maintain an up-to-date register of preselected vendors. 	During the contractual agreement + 5 years	Erasure of personal data	Not applicable
Communications & Sustainability (COM&SUST)				
Communications & Sustainability (COM&SUST)	Name: Media Relations Management	No retention period.	Not applicable	Not applicable

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>Description: Prepare all official press releases, statements, and responses to media enquiries, distribution of the documents to the media representatives, promote a positive image of the organization in the media and respond to inaccurate or misleading reports regarding the organization, ensure that the media and the public are well-informed about the organization's activities and decisions.</p> <p>Purpose: Develop relationships with media, journalists etc., manage external communications to ensure consistency and accuracy, and create communication strategy.</p>			
<p>Communications & Sustainability (COM&SUST)</p>	<p>Name: Social Media Management</p> <p>Description: Managing content across social platforms such as Facebook, Twitter, Instagram, LinkedIn etc. In more detail, monitor the Company social media accounts, or other posts, for comments addressed to or mentioning the organization, in order to appropriately respond to social media users.</p> <p>Purpose: Implementation of marketing strategy, as well as public relations and reputation management.</p>	<p>No retention period</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Communications & Sustainability (COM&SUST)</p>	<p>Name: Stakeholders' Engagement for Materiality Analysis</p> <p>Description: Circulation of questionnaire to specific stakeholders, such as employees, regulatory authorities, relevant Ministries, consumers, industry representatives etc., to identify factors and issues in order to develop the organization's materiality analysis.</p> <p>Purpose: Identify and prioritize the environmental, social and governance issues that could potentially impact the organization's operation and reputation.</p>	<p>No retention period</p>	<p>Not applicable</p>	<p>Not applicable</p>

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Communications & Sustainability (COM&SUST)	<p>Name: Organization of Corporate Events</p> <p>Description: Plan, manage and execute corporate events, in form of conferences, seminars, team-building events, employee recognition events, company anniversaries etc. and capture photographs or video footage, management of distribution of external communication related to events, wishes, corporate newsletters.</p> <p>Purpose: Promotional purposes and implementation of marketing strategy.</p>	No retention period	Not applicable	Not applicable
Information & Communications Technologies (ICT)				
Information & Communications Technologies (ICT)	<p>Name: Logical Access Management</p> <p>Description: Create / disable user accounts, grant, modify and / or revoke user access rights and perform periodic access rights reviews.</p> <p>Purpose: Grant access to the organization's information systems and ensure protection from unauthorized access.</p>	No retention period	Not applicable	<ul style="list-style-type: none"> - Proper and effective execution of work duties - Security reasons regarding the information systems
Information & Communications Technologies (ICT)	<p>Name: Security / system logs management</p> <p>Description: Collection of logs from the Organization's information security systems, monitoring and analysis of logs and alerts.</p> <p>Purpose: Monitoring of system and user activity and identification of abnormal activity and information security incidents.</p>	<p>4 months "online"</p> <p>1 year "offline"</p>	Deletion of logs	<ul style="list-style-type: none"> - Security reasons regarding the information systems
Information & Communications Technologies (ICT)	<p>Name: Incident Management</p>	No retention period	Not applicable	<ul style="list-style-type: none"> - Proper and effective execution of work duties

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<p>Description: Analysis, classification, prioritization, escalation, containment, response actions, gathering and handling of evidence, root cause analysis, resolution measures, recovery from information security incidents.</p> <p>Purpose: Handling of information security incidents.</p>			<ul style="list-style-type: none"> - Security reasons regarding the information systems
<p>Information & Communications Technologies (ICT)</p>	<p>Name: Backup Management</p> <p>Description: Backup copies of information systems are maintained and regularly tested.</p> <p>Purpose: Ensure business continuity and prevent data loss.</p>	<p>This is according to the system. Not the same for all systems/applications</p>	<p>Erasure of data</p>	<ul style="list-style-type: none"> - Proper and effective execution of work duties - Security reasons regarding the information systems
<p>Information & Communications Technologies (ICT)</p>	<p>Name: Asset Register Maintenance</p> <p>Description:</p> <ul style="list-style-type: none"> - Documentation of the company assets that are assigned to the employees, update of the inventory in case of changes to the assigned assets or upon termination of employment. Periodic review of the asset register. - Implementation and operation of a Mobile Device Management solution to secure, monitor, manage and support mobile devices deployed across the organization such as mobile phones, tablets and laptops etc. <p>Purpose:</p> <ul style="list-style-type: none"> - Up-to-date and accurate recording of the company assets that are assigned to the employees. - Manage and secure mobile end point devices (e.g. mobile phones, tablets, laptops). 	<p>No retention period</p>	<p>Not Applicable</p>	<ul style="list-style-type: none"> - Proper and effective execution of work duties - Security reasons regarding the information systems

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Information & Communications Technologies (ICT)	<p>Name: User support regarding technical issues</p> <p>Description: Manage request from organization's employees and the employees of the organization's suppliers for technical support regarding for the company's information systems.</p> <p>Purpose: Provide technical support to the employees.</p>	No retention period	Not Applicable	<ul style="list-style-type: none"> - Proper and effective execution of work duties - Security reasons regarding the information systems
Information & Communications Technologies (ICT)	<p>Name: Data Leakage Prevention <i>[processing activity not currently performed - to be updated upon implementation of the DLP solution]</i></p> <p>Description:</p> <ul style="list-style-type: none"> - Implementation and operation of DLP solution to detect and prevent the unauthorized disclosure of personal data. - Use pop up warning in case of suspicious behavior and/or block user actions. <p>Purpose: Detect and prevent the unauthorized disclosure of personal data.</p>	No retention period	Erasure of personal data	Not applicable
Regulatory & Institutional Affairs (REG&INSTA)				
Regulatory & Institutional Affairs (REG&INSTA)	<p>Name: Customer Complaints Management</p> <p>Description: Receive customer complaints, consult and ensure that all replies to the customer are in accordance with the current regulatory framework.</p> <p>Purpose: Resolve disputes between the organization and its customers.</p>	5 years after the end of the term of service	Erasure of personal data	Greek Civil Code art. 250

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Regulatory & Institutional Affairs (REG&INSTA)	<p>Name: Mediation Processing in Energy Disputes</p> <p>Description: Collecting, storing, and utilizing personal data necessary for the management of mediation procedures. Sharing of specific data with the Hellenic Energy Ombudsman.</p> <p>Purpose: Administer and document mediation processes involving the company and its customers or business partners, in compliance with EU regulations</p>	5 years from the resolution of the dispute	Erasure of personal data	Greek Civil Code art. 250.
Regulatory & Institutional Affairs (REG&INSTA)	<p>Name: Report to Regulatory Authority for Energy (RAE)</p> <p>Description: Regularly report to RAE, including the aggregated data regarding metering and billing of the customers as well as information that indicate the performance of the organization regarding its services.</p> <p>Purpose: Compliance with the regulatory and legal obligations.</p>	5 years	Erasure of personal data	Not applicable
New Business Opportunities (NBUSOP)	<p>Name: Application Submission to Energy Sustainability Projects</p> <p>Description: In order to facilitate the participation of the Organization in energy sustainability projects, the personal data of the designated project administrator is included within the application for these projects.</p> <p>Purpose: Participation in energy sustainability projects such as the GreenMeUp project.</p>	No retention period	Erasure of personal data	Not applicable
Security & Real Estate (SECUR&RE)				
Security & Real Estate (SECUR&RE)	<p>Name: Physical Access Management</p> <p>Description: Recording and management of physical access of employees to via personalized access cards.</p>	1 month	Erasure of personal data	Not applicable

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Purpose: Protection of the employees and the Organization's premises and assets.			
Security & Real Estate (SECUR&RE)	Name: Visitors' Register Description: Management of visitors' register and visitors' access cards. Purpose: Protection of the employees, visitors as well as of the Organization's premises and assets.	1 month	Erasure of personal data	Not applicable
Security & Real Estate (SECUR&RE)	Name: CCTV System Description: Operation and monitoring of CCTV system that monitors the Organization's premises. Operation of cameras for counting the number of employees that enter/exit each floor of the Organization's premises. Purpose: Monitoring and protection of the organization's premises and employees.	- 15 days. - 24 hours in case of cameras used for counting the number of employees	Erasure of personal data	- Hellenic Data Protection Authority Guidelines 1/2011 - Storage Limitation [Art. 5(1) point (e) GDPR]
Security & Real Estate (SECUR&RE)	Name: Management of Corporate Vehicles Description: Assignment of corporate vehicles to the Organization's management. Purpose: Provision of car benefits to employees.	No retention period	Erasure of personal data	Not applicable
Security & Real Estate (SECUR&RE)	Name: Geographical Vehicle Fleet Tracking Description: - Recording of fuel usage and pollutant emissions through 24/7 GPS tracking of each vehicle, with the goal of enhancing sustainability.	No retention period	Erasure of personal data	Not applicable

Function	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	<ul style="list-style-type: none"> - The Organization utilizes the GPS locations of vehicles operated by employees servicing gas infrastructure. - The Organization may access GPS locations of vehicles used by executives solely in situations of theft, and only with prior approval. <p>Purpose: Monitoring and protection of the organization's vehicle fleet, tracking the usage of fuel and the release of emission of pollutants.</p>			
Security & Real Estate (SECUR&RE)	<p>Name: Fuel Cards Management</p> <p>Description: Assignment of fuel cards to those employees within the Organization who have been designated a company car.</p> <p>Purpose: Provision of fuel card benefits to employees.</p>	Until the withdrawal of the Subject's consent	Erasure of personal data	GDPR