DATA RETENTION POLICY

INTRODUCTION

Enaon EDA 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 EDA, 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 are 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 EDA, 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 are determined based on the period needed to fulfill the purposes for which the data are processed, as well as on business needs, contractual obligations, legal claim limitation periods, and legal retention requirements.

In the event that Enaon EDA 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 EDA, as well as the destruction of any existing copies, unless otherwise required by law or agreed upon in writing.

Enaon EDA 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 EDA 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 EDA 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 EDA 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 singed declaration of secure deletion, disposal / destruction must be requested by Enaon EDA.

ANONYMIZATION OF PERSONAL DATA

As an alternative of data deletion, Enaon EDA 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 EDA 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

Francesca Zanninotti

ANNEX: DATA RETENTION PLAN

The following table refers to Enaon EDA'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.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Commercial (COMM)				
Commercial (COM)	**Name:** Management of New Connection Applications **Description:** Collection, storage, and processing of personal data provided by customers who submit request for interest for connection with the natural gas network or a new connection application. **Purpose:** Manage and processing of applications from potential new customers.	- In case of existing customers, the retention period is during the contractual agreement + 20 years after the expiration of the agreement.	Erasure of personal data.	- Greek Civil Code art. 249. Greek Civil Code art. 914, 937.
Commercial (COM) Engineering & Construction (for main Greece)	**Name:** On-site Technical Inspections **Description:** Collection, storage, and processing of personal data in order to schedule, organize and conduct the on-site technical inspections, communicate with the applicant concerning inspection details and results, make decisions on the feasibility of the connection.	- The retention period is 20 years from the termination of the contract.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937. - Fulfillment of the Organization's duties as the Operator of the

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Purpose: Management and execution of on-site technical inspections to determine the feasibility of implementing new connection applications.			Gas Distribution Network in accordance with the Gas Distribution Network Management Code as well as security reasons of the Gas Distribution Network.
Commercial (COM)	**Name:** Issuance of Connection Quote or Rejection Notification **Description:** Document and provide to the potential customers connection quotations or rejection notifications. **Purpose:** Provision of a quote for the proposed connection or communicate the rejection.	The retention period is 20 years from the termination of the contract.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.
Commercial (COM)	**Name:** Contract Signing and Management **Description:** Conclusion of the Contract including the delivery of the necessary supporting documents, such as the	The retention period is 20 years from the	Erasure of personal data	- Greek Civil Code art. 249.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	receipt of the Connection Fees payment, the written authorization submitted by the interested party for the execution of the necessary works on behalf of the owner or the person authorized to manage the property or, in any other case, of the person having legal right to issue such authorization, as well as any other documents stipulated by Law. **Purpose:** Management of the signing of contracts.	termination of the contract.		- Greek Civil Code art. Art. 914, 937. - Fulfilment of the Organisation's obligation for the conclusion of the contracts.
Commercial (COM)	**Name:** Management of Requests for Prioritization and Time Extension **Description:** Collection, storage, and processing of personal data associated with requests to expedite the delivery point building process or with requests asking for additional time for the building of the internal installation. **Purpose:** Manage requests related to construction and installation timeline.	The retention period is 20 years from the termination of the contract.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937 Fulfillment of the contractual agreement's obligations.
Commercial (COM)	**Name:** Management of Requests for Prioritization and Time Extension **Description:** Collection, storage, and management of personal data required to handle and respond to various request types from existing customers (e.g. supply request,	- The retention period is 20 years from the termination of the contract.-The necessary medical	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	representation request, change of representation request, succession request) in order to identify the customer, process their request, communicate with the customer regarding their request, and provide the requested service or support. **Purpose:** Management and response to requests from existing customers	data are retained for one year after collection.		- Common practice and storage Limitation [Art. 5(1) point (e) GDPR]
Commercial (COM)	**Name:** Management of Complaints **Description:** Collection, storage, and management of personal data required to handle and respond to complaint of customers and non-customers in order to process their complaint and communicate with and respond to the applicant regarding their complaint. **Purpose:** Management and response to complaints	- In case of existing customers, the retention period is 20 years from the termination of the contract - In case of third parties complaints, the retention period is 20 years.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.
Commercial (COM)	**Name:** Issuance of User License **Description:** Collection, storage, and processing of personal data necessary for the validation of technical studies and the issuance of a User License. Review and validate the technical	- The retention period is 20 years from the termination of the contract.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	study, schedule and conduct a site visit by the inspection engineer, complete the internal installation inspection form, finalize the review of the supplementary technical report documents, ensure the conformity of the technical report with applicable legislation and regulation, and issue the User License for the installation. **Purpose:** Certification of the safe and compliant implementation and operation of natural gas installations.			
Commercial (COM)	**Name:** Sample On-site Technical Inspections of Internal Installation **Description:** Collecting, storing, and using necessary personal data for performing sample on-site inspections of the internal natural gas installations evaluate the state of the installation and whether the necessary maintenance work is being carried out, communicate the results and any required actions to the customer, and record these inspections for future reference and compliance verification. The sample is selected based on specific criteria and the customer is informed regarding the upcoming inspection. **Purpose:** Verification of regular customer maintenance	- The retention period is 20 years from the termination of the contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Commercial (COM)	**Name:** Management of Requests and Complaints Related to the Internal Installation **Description:** Collection, storage, and processing of personal data necessary to handle and manage customer requests and complaints, such as requests for a copy of the technical study, requests for transfer of ownership, requests for reactivation etc. **Purpose:** Provision of customer service	The retention period is 20 years from the termination of the contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.
Commercial (COM)	**Name:** Validation of Gas Fuel Design **Description:** Collecting, storing, and processing personal data necessary for the validation of gas fuel design submissions of new building, in order to issue the certificate of proper and complete implementation of the gas design. **Purpose:** Issuing of the certificate of proper and complete implementation of the gas design of new buildings.	- The retention period is 20 years from the termination of the contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.
Engineering & Construction (ENG&CON)				
Engineering & Construction (ENG&CON)	**Name:** Delivery Point Construction **Description:** Constructs the natural gas delivery point, which includes the entire installation from the Organization's gas	- The retention period is 20 years from the	Erasure of personal data.	- Greek Civil Code art. 249.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	distribution network up to the metering device. In more detail, install all individual components that are necessary for the construction and operation of the External Installation as well as install the pressure reduction station and for any adjacent installations. **Purpose:** Construct the natural gas delivery point in accordance with the request of new connection to the Organization's gas distribution network, submitted by the owner or the end customer.	termination of the contract..		- Greek Civil Code art. Art. 914, 937.
Engineering & Construction (ENG&CON)	**Name:** Management of Customer Complaints **Description:** Receive customer complaints relevant to road and sidewalk rehabilitation, update of expected delivery date of delivery point construction, consult and ensure that all replies to the customer are in accordance with the current legal framework. **Purpose:** Resolve disputes between the Organization and its customers relevant to new connections.	- In case of existing customers, the retention period is 20 years from the termination of the contract. In case of third parties complaints, the retention period is 20 years upon receiving the complain.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937
Network Management (GEST)				

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Network Management (GEST)	**Name:** Management of End Customers' Requests **Description:** Receive and address customer request (e.g., new connections, deactivation and reconnection of installation) submitted via e-mail, call center and / or online form in the Organization's website. **Purpose:** Manage requests of new connections, deactivation and reconnection of installation.	The data are retained for 20 years upon receiving the requestyears	Erasure of personal data.	- .Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937.
Network Management (GEST)	**Name:** Management of Emergency Network Operation Incidents **Description:** Ensure and / or immediately restore safety and, if technically feasible, smooth operation of the gas distribution service in case of malfunction (leakage or shortage of gas) of the distribution network, or safety in case of gas leakage after the delivery point, i.e. in the consumer's internal installation. **Purpose:** Manage emergency network operation incidents, aiming to ensure the safety of end customers and the Organization's gas distribution network.	The retention period is 20 years from the termination of the contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937
Network Management (GEST)	**Name:** Planning and Assignment of Technical Work Orders	Employee data are kept for 5 years	Erasure of personal data.	- Greek Civil Code art. 250 par.17,

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Description: Schedule and assign technical work orders based on the criticality of the orders as well as the availability of technicians and vehicles. Assign technical work orders in case of emergency network operation incidents based on the list of technicians on standby and on shift duty as well as their location and distance from the address of the reported emergency incident. **Purpose:** Processing of technical work orders.	starting from January 1st of the year following the year in which the work was performed (for non-tax and non-insurance data). For tax and insurance-related data, it is retained for 10 years starting from January 1st of the year after the employment occurred. Consumer data are retained for 20 years starting from the termination of the technical work.		art.249, Art. 6(1) L. 4997/2022, Art. 36(2) L. 4174/2013 as applicabl.
Network Management (GEST)	**Name:** On Site Technical Inspection	The retention period is 20 years from the	Erasure of personal data.	- Greek Civil Code art. 249.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Description: Perform on site technical inspection of the Organization's gas distribution gas network as well as the delivery point and the end customers' internal installation. **Purpose:** Perform necessary on-site technical inspection actions to ensure the safety of end customers and the Organization's gas distribution network.	termination of the contract		
Network Management (GEST)	**Name:** Granting License for Construction Projects Affecting the Gas Distribution Network **Description:** Manage requests, submitted via e-mail, the Organization's website by completing the relevant form or correspondence, from third parties (e.g. electricity suppliers, telecommunications suppliers etc.) whose construction projects that may affect the Organization's gas distribution network. Inspect the area of construction projects and grant license to the of third parties, based on the Organization's current gas distribution network.	Data are retained for 20 years after the termination of contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. Art. 914, 937

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Purpose: Ensure the safety of the Organization's gas distribution network and comply with the current legal and regulatory framework.			
Network Management (GEST)	**Name:** Meter Calibration and /or Inspection **Description:** Receive and the address the an end customer's request regarding the volume of gas passing through network, by the performing check on the correct recording of the volume of gas. Replace the meter and send it to special calibration laboratories. In case the meter is found not to be working according to the specifications, the cost of the calibration will be assumed by the Organization, otherwise the calibration service will be charged to the applicant (e.g., the end customer). **Purpose:** Perform necessary on-site technical inspection actions to ensure the safety of end customers and the Organization's gas distribution network.	Data are retained for 20 years after the termination of contract	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Perform checks check on the correct recording of the volume of gas passing through network.			
Metering & Billing (MET&BIL)				
Metering & Billing (MET&BIL)	**Name:** Management of Contract with Distribution Users **Description:** Receive personal data from Suppliers legal representative. **Purpose:** Communicate with third parties regarding the contractual agreement.	The data are retained for 20 years after the termination of the contract.	Erasure of personal data.	- Greek Civil Code art. 249 - Greek Civil Code art. 914, 937.
Metering & Billing (MET&BIL)	**Name:** Management of Distribution Users' Requests **Description:** Receive and address Gas suppliers requests (e.g., supply request, representation request, change of representation request, succession request). **Purpose:** Manage the request submitted by the Gas Suppliers' on the behalf of the customers.	Data are retained for 20 years after the termination of contract.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937.
Metering & Billing (MET&BIL)	**Name:** Development of Customer Register **Description:** Create the customer register via exporting a file from the Organization's CRM/ERP including only the Electronic Delivery Point Identification Code and technical	The data are kept for 20 years after the registration.	Erasure of personal data.	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	data regarding the gas supply connection and uploading the data to MyPortal/FTPServer. **Purpose:** Provide information regarding the active gas supply connections using the Electronic Delivery Point Identification Code.			
Metering & Billing (MET&BIL)	**Name:** Management of Metering Information **Description:** Sent and receive files that include the meter readings of non-hourly-metered end consumers in collaboration with third party. Manage smart meter, including the installation of smart meter and the register of meter readings. Manage the meter readings that have been submitted via the Organization's website, by using the relevant form. Import meter readings to the system of metering management. **Purpose:** Register of meter readings to ensure accurate billing based on the actual consumption of each customer.	20 years	Erasure of personal data	- Greek Civil Code art. 249 - Greek Civil Code art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
Metering & Billing (MET&BIL)	**Name:** Management of Gas Theft Incident **Description:** Perform audits by sampling. In case an incident of gas theft is detected, the Organization informs both the gas distribution supplier and the customer, with the relevant Electronic Delivery Point Identification Code, regarding the incident and the extra fees. In case the employees of Engineering & Construction Division are not able to access the meter (due to customer's fault) for longer than a year, the Organization takes legal actions. In addition the Organization installs smart meters to reduce the incidents of gas theft, so as to preserve the security of its gas network and the infrastructure. **Purpose:** Ensure that the Organization's gas network and infrastructure are secure.	The Costumer data are retained for 20 years after the incident.	Erasure of personal data	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937.
Metering & Billing (MET&BIL)	**Name:** Billing of Ancillary Services and Gas Theft Incidents **Description:** Manage the billing of all ancillary services, such as connection of new Delivery Points to the distribution network, installation and maintenance of smart metering systems, emergency technical inspections at the pressure metering and regulating stations of the Delivery Points etc.	The data related to Tax Obligation are retained for 10 years from the end of the physical year The remaining data related to Costumers	Erasure of personal data	- Art. 36(2) L. 4174/2013 as applicable - Greek Civil Code art. 249 - Greek Civil Code art. 914, 937.

Division	Processing Activity	Maximum Retention Period	Action at the End of the Retention Period	Contract Clause/ Legal Provision
	Manage the billing of extra fees due to gas theft incident. **Purpose:** Ensure accurate billing of ancillary services gas theft incidents.	are retained for 20 years from the termination of the contract.		
Metering & Billing (MET&BIL)	**Name:** Communication with Customers **Description:** Sent letters and viber messages to end customers so as to inform them regarding the audit of inactive meter, the day of metering in order to ensure access to the meter, latest zero meter readings etc. **Purpose:** Serve and inform the end customers regarding issues relevant to metering and billing.	During the contractual agreement + 20 years after the termination of the contract.	Erasure of personal data	- Greek Civil Code Art. 249. - Greek Civil Code art. 914, 937.
Metering & Billing (MET&BIL)	**Name:** Management of Customer Complaints **Description:** Receive customer complaints relevant to metering and billing issues, consult and ensure that all replies to the customer are in accordance with the current legal framework. **Purpose:** Resolve disputes between the Organization and its customers relevant to metering and billing issues.	20 years after the termination of the contract.	Erasure of personal data	- Greek Civil Code art. 249. - Greek Civil Code art. 914, 937.