

PRIVACY NOTICE

Last update: 24-02-21

Iberdrola, S.A. has developed a tool to manage its relations with suppliers interested in participating in tender processes for the awarding of contracts with Iberdrola S.A. or any of the companies of its group in accordance with mercantile legislation ("**Iberdrola Group**"). This tool (hereinafter, indistinctly, the "**Portal**" or the "**Register of Potential Suppliers and Suppliers**" or "**Register**") is managed by Iberdrola S.A. and the information that is contained at any time as a result of interactions with third parties (interested suppliers, homologated suppliers, contracted suppliers and, in the case of legal entities, their representatives and contact persons) is accessible to all companies of Iberdrola Group, some of which are outside the European Economic Area. The list of such companies is accessible through https://www.iberdrola.com/wcorp/gc/prod/es_ES/corporativos/docs/IB_Informe_Financiero_Anual.pdf

Therefore, for the purposes of personal data protection laws and regulations, we inform you that any information about suppliers and potential suppliers (and, in the case of legal entities, their representatives and contact persons) that we obtain as a result of a request to register in the Portal or any preliminary contact or initiative with Iberdrola, S.A. or any of the companies of the Iberdrola Group for the purposes of qualifying as a supplier, entails the inclusion of such information in the Portal and its access and awareness by any of the referred companies that belong to the Iberdrola Group.

Iberdrola, S.A and the companies that form part of the Iberdrola Group (hereinafter, any of them, "**Iberdrola**") undertake to protect your privacy and guarantee compliance with personal data protection legislation, in particular, the General Data Protection Regulations ("**GDPR**"), the Organic Law on the Protection of Personal Data and guarantee of digital rights ("**LOPDGDD**") and any local laws of the territories in which Iberdrola group companies operate. Your personal data will be treated lawfully, fairly and transparently, according to specific explicit and legitimate purposes; only if they are adequate, relevant and limited to what is necessary in relation to those purposes. In addition, we will keep your data accurate and up to date, retaining them in such a way that your identification is permitted only for the time necessary to fulfil the purposes of the processing.

Iberdrola has implemented technical and organizational measures to protect your personal data from accidental loss and from unauthorized modification, access, use and disclosure. We have established procedures to respond in the event of a security incident that affects your personal data.

By means of this Privacy Policy we inform you about the processing of the personal data of a Supplier (or, in the case of legal entities, their representatives and contact persons) while remains registered in the Register and, if applicable, during the contractual relationship with Iberdrola.

If we update this privacy notice we will notify you through the Iberdrola website in a timely manner.

If, as a consequence of your contractual relationship with Iberdrola, you provide us with third parties data, such as name, positions and contact details of your employees, directors, officers, shareholders or representatives, you must, prior to providing such data, inform such third parties about the processing of them in the terms set out in this Privacy Policy.

Who is responsible for processing your personal data?

The data controllers of your personal data are (i) the company of the Iberdrola Group with whom you have a contractual relationship and whose identification appears in the contractual documentation and (ii) Iberdrola, S.A. with registered office at Plaza Euskadi 5, Bilbao, Spain as holder of the Register of Potential Suppliers and Suppliers of the Iberdrola Group and as the provider of purchasing services to the other companies of the Iberdrola Group.

Likewise, any of the companies of the Iberdrola Group is or may become responsible for the processing of the data to the extent that (i) the information incorporated in the Portal of Suppliers and Potential Suppliers is produced through the same or (ii) said companies access the content of the Portal.

The companies of the Iberdrola Group have designated Data Protection Delegates. You may contact them at the following email addresses, when applicable:

- Iberdrola, S.A.: dpo@iberdrola.com
- Rest of the Iberdrola Group companies in Spain: dpo@iberdrola.es
- Iberdrola Energía Internacional, S.A.U., Iberdrola Clientes Internacional, S.A.U. and Iberdrola Renovables Internacional, S.A.U.: dpoiei@iberdrola.com
- Iberdrola Group companies in UK: dataprotection_corporate@scottishpower.com
- Iberdrola Group companies in Italy: dpo@iberdrola.it
- Iberdrola Group companies in Portugal: dpo@iberdrola.pt
- Iberdrola Group companies in Ireland: dataprotection@iberdrola.ie
- Iberdrola Group companies in France: dpo@iberdrola.fr
- Iberdrola Group companies in Germany: datenschutz@iberdrola.de
- Iberdrola Group companies in Brazil: dpo@neoenergia.com

What personal data do we collect and process from you?

The personal data that we may collect from you belongs to the following categories:

- Data of an identifying nature: name, surname, national identity document, tax identification number, foreigners' identity number, passport or other identity document, postal address, landline/mobile telephone, email, image and signature. In case of the contact person, also their professional email, for the purposes of the double authentication factor detailed in the section relating to the purposes of the processing.
- Data related to personal characteristics: civil status, family data, date and place of birth, age, gender, nationality, languages. In addition, where legally permissible, Avangrid, Inc. and its subsidiaries and other entities of the Iberdrola Group established in the USA may collect information regarding race, ethnicity, veteran and disability status for compliance with small business concerns regulations, equal employment opportunity reporting and other legal and compliance purposes.
- Academic and professional data: professional activity, training, qualifications, professional experience, memberships in professional associations, occupation and job title and work center.
- Economic, financial and insurance data: Bank data for transfers and payments and tax and social security certificates.
- Business activities: services provided.

We may request that you provide original documentation and deliver a copy of it, as evidence to support the information you have submitted.

How do we collect your personal data?

You provide us with your personal data through the information you communicate to us when registering in the Register of Potential Suppliers and Suppliers of Iberdrola and, where applicable, through the contracting process and during the contractual relationship with you or with the legal entity you represent or acts as contact person.

If you do not provide us with the requested personal data, we may not be able to register you or the legal entity you act as representative or contact person) as a supplier, comply with the contractual relationship or with our legal obligations and manage our activities.

We ask that you update your personal data as it changes and to always provide truthful information, as we must have your current information.

For what purposes do we process your data?

Iberdrola will only process your personal data in accordance with the following purposes:

- a) Periodically verify that the supplier complies with the requirements that were required during the supplier qualification process undertaken when you registered as an Iberdrola supplier.
- b) Manage your participation in purchasing processes.
- c) Maintenance, development and control, in all its aspects, of the contractual relationship.
- d) Internal management of suppliers.
- e) Preparation of surveys, statistics and internal reports.
- f) Sending communications related to sustainability, ethics and compliance.
- g) Collection and payment management.
- h) Administrative management.
- i) Management of the coordination of business activities and prevention of occupational hazards of contractors and health and safety.
- j) Submission of tax information.
- k) In connection with administrative and judicial proceedings and actions before public authorities.
- l) Management of complaints and inquiries in the supplier ethical channel, analysis of possible conflicts of interest and analysis of solvency, anti-corruption, fraud or related risks.
- m) Control of access to facilities and other security activities.
- n) In case of the professional email of the contact person with the Iberdrola Group, to apply a dual authentication factor in the access to the information systems consisting of adding a second method of user verification.
- o) Invitation to information sessions and supplier awards.
- p) To keep the track record of previous agreements entered into between Iberdrola and the supplier for assessment purposes in relation to future contracts.
- q) To comply with applicable legal or regulatory requirements or orders from regulatory agencies and responding to government, judicial or regulatory requests.
- r) External audit.

In relation to the purpose indicated in section l), specifically in relation to risk analysis, it is reported that in order to carry out said analysis it is possible that personal data of individuals (representatives, directors or shareholders) linked to the supplier company of the Iberdrola Group company legitimately obtained from public registers or some companies as Refinitiv

<https://www.refinitiv.com/en/products/world-check-kyc-screening/privacy-statement>, Dow Jones <https://dilogin.dowjones.com/privacy/default.aspx?fcpi1=en> or Informa. The Supplier or Potential Supplier agree to inform such persons in accordance with these privacy notices and to indemnify the Iberdrola Group company with which you have a contractual relationship from any damages that may result from failure to comply with this obligation.

What is the legal basis for the data processing?

The legal basis for the processing of your data, for the purposes indicated in sections a), b), c), and g), if the personal data belongs to the contact persons or representatives of a supplier that is a corporate entity, it is the legitimate interest of Iberdrola in managing existing and future relations with such supplier. If the personal data belongs to a supplier that is an individual, the legal basis for the processing is the performance of the contractual relationship.

The legal basis for the processing of your data for the purposes indicated in sections i), j) and q) is to comply with legal obligations.

The legal basis for the processing of personal data for the purpose indicated in section l) is the public interest and the legitimate interest of Iberdrola in the creation and maintenance of information systems through which the company can be made aware by the commission, within it or by third parties who contract with it, of acts that may be contrary to applicable law or internal rules of Iberdrola, respectively.

The legal basis for the processing of personal data for the purposes indicated in section m) is the public interest in preserving the security of people and property, as well as of the facilities of Iberdrola and the legitimate interest in controlling access to such facilities to guarantee their security and the security of people and property.

The legal basis for the processing of personal data in accordance with the purposes indicated in sections d), e), f), h), k), n), o) and p) is the legitimate interest of Iberdrola in, respectively, (i) managing and adequately organizing its relations with suppliers, (ii) improving such relations and obtaining statistics in this regard, (iii) promote awareness regarding sustainability, ethics and compliance, (iv) maintain adequate internal management of Iberdrola Group, (v) exercise its rights to effective judicial protection of the right and defence, (vi) ensure the security of its computer networks, ethical compliance, fraud prevention and money laundering; (vii) invite you to events, acts and contests organised by Iberdrola and (viii) to keep a track record of prior contracts for the purposes of facilitating the formalization of future agreements with the supplier.

The processing of data detailed in section r) is to comply with the audit legal obligations for those companies that have to fulfillment an external audit or Iberdrola's legitimate interest to review the annual accounts of those companies of Iberdrola group that don't have that legal obligation.

How long do we store your data?

The personal data processed for the purposes detailed in sections b), c), d), g), h), i), j), k), l) and n) will be kept for the period of time necessary to comply with the purpose for which they were collected and in any case until the end of the contractual relationship. The data may be kept at a later date, duly blocked, until the expiry of the prescription periods of the possible obligations to which Iberdrola is subject and of the possible responsibilities deriving from the processing of said data.

Personal data processed for the purposes envisaged in paragraph a) shall be kept for as long as the supplier maintains the status of authorized supplier and provided that it has not notified Iberdrola its decision not to participate in future tenders organized by Iberdrola.

Personal data processed for the purposes set for in letter e) will be kept until finalisation of the survey, statistic or report and in the case of purpose r) until the end of the external auditory adding to it the established legal periods.

Personal data processed for the purposes set forth in letters f) and o) will be kept until the time you exercise your right to oppose to the processing.

Personal data processed for the purposes of complying with the purposes set forth in letter m) will be kept in accordance with our security procedures and practices. In the case of Iberdrola Group companies established in Spain, for data derived from video vigilance cameras, such data will be deleted within a month of being collected, unless it is necessary for it to be retained to accredit the commission of acts against the integrity of persons, possessions or facilities.

Iberdrola Group companies established in Spain will keep in the Ethics Mailbox the personal data processed for the purposes set forth under letter l) in the Ethics Mailbox for a maximum period of three months from their arrival therein. Other group companies may keep such personal data for longer periods in accordance with internal procedures and practices.

Personal data collected for the purposes intended in paragraph p), shall be kept by Iberdrola beyond the termination of the agreement and for as long as the supplier has an interest in being engaged by Iberdrola provided that, accordingly, it has not objected to such use of the personal data.

Who will receive your data?

Your personal data (or the personal data of the representative or contact person in the case of legal entities) may be communicated to third parties and public authorities (i) when necessary for the management, performance or enforcement of the contractual relationship, including compliance with our obligations or the exercise our rights, (ii) if we are required to do so by law or regulation, or (iii) to comply with court orders, legal process or government, judicial or regulatory requests. Your data may be communicated to insurance and reinsurance companies, insurance intermediaries, in necessary cases and external auditors.

We may share the data in connection with corporate transactions, including during the course of due diligence processes related to such transactions.

The personal data of the Supplier (or the personal data of its representatives or contact persons in case of legal entities) may be communicated to Iberdrola Group companies that may be interested in contracting with you. Such companies of the Iberdrola Group are those listed on the corporate website:

https://www.iberdrola.com/wcorp/gc/prod/en_US/corporativos/docs/IB_Annual_Financial_Information.pdf

In this context, in the event that the communication of your personal data occurs to Iberdrola Group companies located outside the European Economic Area, in countries that do not offer an adequate level of protection of personal data equivalent to that established in the European Union, we inform you that such transfers will be made in accordance with applicable data protection laws and our binding corporate rules ("**BCR**"). Having BCRs in place means that all

entities in our group that subscribe to them have to comply with the GDPR and the same internal rules. It also means that you have the same rights regardless of where Iberdrola processes your data. You can download a copy of the Iberdrola Group BCRs <https://www.iberdrola.com/privacy-policy/binding-corporate-rules>

Your personal data will be accessible by affiliates and third parties that provide services related to the contractual relationship such as information services on creditworthiness or credit risk, billing and payment services, accounts payable management, consulting services and preparation of reports and reporting, computer services, training services, surveillance and security services. We sign contracts required by GDPR with third party service providers which regulate their obligations as data processors. In these contracts, when the companies are located in a third country that does not offer an adequate level of protection of personal data equivalent to that established in the European Union, Iberdrola will ensure that it has the appropriate measures in place so that your data is protected in the country and organization of destination in identical or similar terms to those provided for in European and Spanish regulations. You may contact Iberdrola at any time to learn about the specific guarantees that have been implemented for the adequate and appropriate protection of your data.

What are your rights?

You have the right of access to your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its erasure when data is no longer necessary for the purposes for which it was collected, in addition to exercising the right to object and restrict the processing and data portability. If we rely on your consent to process your data, you may withdraw consent at any time without retroactive effect. You can exercise these rights by writing to the following addresses:

- For Iberdrola Group companies located in the European Union: - Dirección de Administración, Plaza Euskadi 5, 48009 Bilbao. By e-mail: Gestionterceros@iberdrola.es
- To ScottishPower group companies: dataprotection_corporate@scottishpower.com or Data Protection Officer, Scottish Power UK Plc, 320 St Vincent Street, Glasgow, G2 5AD.
- To Iberdrola México Group companies: mx.protecciondatos@iberdrola.com or Boulevard Manuel Ávila Camacho No. 24, piso 19, Col. Lomas de Chapultepec, C.P. 11000, Ciudad de México.
- To Avangrid Group companies: VendorMaintenance_AdminUSA@avangrid.com or AVANGRID General Administration, 162 Canco Road, Portland, Maine 04103

You may file a complaint with the Spanish Data Protection Agency, or equivalent supervisory authority.