



## EYDAP S.A.'s PRIVACY POLICY FOR CONSUMERS

In its dealings with consumers EYDAP S.A., whose registered offices are in Galatsi, Attica at 156 Oropou St.), is bound by the provisions of Regulation (EU) 2016/679 and Greek law to respect their privacy and ensure the confidentiality and security of their personal data.

The purpose of this privacy policy is to provide information about the type of personal data EYDAP S.A. collects, saves, uses and transfers, the means of protection and the rights users have in relation to such processing, which in all events is done in a reliable and transparent manner.

In order to be transparent about how personal data is collected, used and exchanged and to disclose the purpose and means of processing, EYDAP S.A. provides consumers with the following information:

- ***Controller and purposes of processing***

EYDAP S.A., as duly represented, is entitled as data controller to process the necessary personal data of its consumers exclusively for the purpose of implementing and supporting the water supply and/or sewerage contract which exists between them, examining and handling user requests, and for the purpose of discharging its contractual and legal obligations.

Consumer personal data is collected from consumers themselves and is freely provided by them or by authorised persons.

EYDAP S.A. processes the personal data of its consumers for the following indicative purposes:

Contract signing

water supply/sewage, dispatch of bills, communication with customers, updating of customer data, forwarding of debts to EYDAP's Legal Services, telephone customer service, managing the website, informing customers via SMS, finalising the issuing of bills, checking that bills are correct, handling special billing issues, billing illegally obtained water, billing connection fees, handling overdue debts from connection fees, reducing bills, allocating debts, keeping a file of amounts to be refunded as having been wrongly paid, taking meter readings, checking and entering data to the system operated by EYDAP, complaint management, stock-taking, preventative checks, managing customer registration requests on EYDAP's website, collaborating with committees to evaluate requests for debt settlements, debt reduction, special discounts, dispatch of correspondence from all of EYDAP, keeping of correspondence files, identifying illegal supply of water during metering, billing and costing of customers, etc.

- ***What information is collected and in what cases***

All personal data processed by EYDAP has been disclosed to it by you (the Data Subject) or a person authorised by you or is clear from clearly published data or public authorities to which we have lawful access for the purpose of connecting up the property's sewage system or investigating the property's ownership regime. (municipalities, land registries, cadastral offices, etc.)

The personal data collected by EYDAP in the context of its collaboration with consumers and their specific requests submitted either to its Regional Centres or to its competent departments or via its call centre 1022 or its website [www.eydap.gr](http://www.eydap.gr)), which relate to the contract in each case and the request submitted by you, fall into the following categories overall (rather than to any specific case): name-surname, father's name, mother's name, ID Card No., Tax Reg. No., tax office, home address, area, postcode, phone number, address email, date and place of birth, E9 form, E1 form, copy of lease, solemn declaration from the data subject and/or owner in the case of the lessor, family status certificate, statement of tax payable, statement of start of business activity. In exceptional cases, such as special tariffs (under Law 4839/2016) or special discounts or special arrangements we request your national insurance number and a certificate of disability from the Disability Certification Centre.

If you submit supporting documents on your own initiative which contain other categories of ordinary personal data or special categories of data which have not been specified in accordance with the provisions of the foregoing paragraph, be aware that you are providing that data freely and with your express consent so that the request submitted can be handled, and will be processed in the context of those purposes.

EYDAP collects the following types of data via the website "eydap.gr" in the following cases:

- i. *Online bill payment:* in the case of online payment, EYDAP S.A. does not retain your bank account number but redirects you to the Bank of your choosing.
- ii. *Call centre 1022:* If you select the "clicktocall" option we collect your name-surname, phone number, choice of topic and contact time and under the 'report problem or fault' we collect the relevant water or sewerage damage category, municipality, address, number, perpendicular road, area, name-surname, phone number, email, meter No. register No. and comments – description of fault.
- iii. *Applications for social tariffs:* If you request an extraordinary special tariff, we collect your Tax Reg. No. and national insurance number and any certificate from the Disability Certification Centre as appropriate, while in the case of gratis concession/hosting, you must submit an additional copy of the bill, a photocopy of the ID card or other ID document and a copy of the E1 form with the permanent address clearly displayed.
- iv. *Debt repayment plan applications:* We collect your EYDAP Reg. No., ID Card No., Tax Reg. No., email and capacity as tenant or owner, with the following attachments as appropriate: a copy of the ID Card, authorisation or power of attorney, Articles of Association or Government Gazette issue, recent form E9 or ownership agreement, lease from taxisnet and attested solemn declaration with the consent of the owner in

- the case of a tenant.
- v. *Correction of data:* EYDAP Reg. No., meter number, signed solemn declaration, copy of ID Card and, as appropriate in each case, the E9 form, lease and/or suitable authorisation.
  - vi. *My connections:* To register you for the online bill and consumption monitoring service, EYDAP S.A. collects a solemn declaration while to register you for remote metering it collects your corporate name, company Tax Reg. No., representative, name-surname, phone number, email and connection number.

- ***What is the legal basis for processing?***

EYDAP S.A.'s legal basis for processing your data in this context is the water supply / sewerage contract and contractual commitments deriving from it, compliance with the Company's legal obligations, public interest and any legitimate interests of the Company, over which your rights do not take precedence.

- ***Disclosure to third parties***

Consumer data in special cases is also disclosed to other third parties when necessary, such as public bodies and authorities. In special cases (e.g. 1022, transmission of correspondence) data are disclosed to and processed by third party associates of EYDAP S.A. acting on the latter's instructions as processors, whom the Company has placed under obligation by a contract which ensures the protection of personal data by them in accordance with Article 28(3) of the Regulation. These include companies which undertake to use and manage our IT systems, to communicate with consumers, to send out bills and updates, collaborate with which is considered necessary to effectively implement the relationship between you and us. You can find out more about the names of our associates by submitting a request to that effect.

- ***Data retention***

Your personal data will be retained and processed during the entire contractual relationship with EYDAP and the individual contractual commitments it has entered into, depending on the nature of your request, and for 20 years from termination thereof in any manner (e.g. transfer of property, change of lessor, expiry of debt repayment plan, etc.) subject to an extension in the retention period in the case where any type of claim is made, for such time as that claim remains active.

If your request is accepted, the supporting documents you have submitted will be retained for the entire duration of your contractual relationship with EYDAP and the individual contractual commitments it entails, depending on the nature of your request, and for 20 years from the date on which it is terminated in any manner, subject to an extension in the retention period in the case where any type of claim is made, for such time as that claim remains active. After that time period elapses, they shall be deleted in a non-recoverable manner.

If your request is rejected, the supporting documents you have submitted will be retained for 5 years from notification of the rejection result to you to safeguard the interests of EYDAP in the case where you make a claim to that effect, and will be deleted in a non-recoverable manner after the end of the 5-year period.

- ***Consumer rights and exercise thereof***

In all events, you have control over the processing of your personal data. More specifically, the European Union's General Data Protection Regulation (GDPR) (Reg. (EU) 2016/679) recognises and safeguards the following rights:

- The right to transparent information, announcements and arrangements to exercise your rights (Articles 12, 13, 14 of the GDPR), in other words your right to learn about how your personal data is used (as is done in detail in the Privacy Policy posted on the EYDAP website).
- The right of access (Article 15 of the GDPR) to personal data collected from you. Note that EYDAP S.A. will provide a copy of the personal data after the relevant request is submitted, but for any additional copies it reserves the right to require payment of reasonable costs.
- The right to correct any inaccurate personal information (Article 16 of the GDPR).
- The right to erase your data (the right to be forgotten) (Article 17 of the GDPR). The right to erasure - right to be forgotten cannot be implemented by EYDAP S.A. insofar as processing is necessary to comply with a legal obligation, for reasons of public interest, to establish, exercise or defend legal claims or for archiving purposes, scientific or historical research purposes or statistical purposes.
- The right to limit the processing of your personal data (Article 18 of the GDPR)
- The right to object (Article 21 of the GDPR) to the processing of your personal data
- The right to withdraw your consent already given (Article 7 of the GDPR), in other words to withdraw your consent at any time for processing done based on consent. The legality of personal data processing done during the time period prior to withdrawal is not affected by the withdrawal of consent.
- The right to lodge a complaint with the competent supervisory authority, which in our case is the Hellenic Data Protection Authority (1-3 Kifissias Ave., Athens, GR- 11523, +30 210 6475600, [contact@dpa.gr](mailto:contact@dpa.gr))

You are entitled to exercise your rights by sending an email to the email address [dpo@eydap.gr](mailto:dpo@eydap.gr) or by letter to 9 Ilission St., Athens GR-15771 by filling out the relevant "exercise my rights" form provided to you. You can find the "exercise my rights" form both on the EYDAP website [www.eydap.gr](http://www.eydap.gr)) and at EYDAP Regional Centres.

We ask that requests be accompanied by appropriate evidence to identify you, and EYDAP S.A. expressly reserves the right to request additional information to identify you and confirm your particulars.

- **Technical and organisational measures**

The company ensures that suitable and necessary technical and organisational measures are taken to safeguard personal data from a technological and physical safety perspective in accordance with Article 32, such as encryption and regular testing, access restrictions, installing cameras in specific areas, issuing special codes to authorised personnel to access databases, etc. and it complies with the processing principles in accordance with the letter of the Regulation, namely the principles of legality, objectivity and transparency, restricted processing purposes, data minimisation, accuracy, limited storage periods and data integrity and confidentiality (Article 5). To safeguard privacy, we implement best personal data security practices, by adopting the necessary technical and organisational measures specified in the GDPR. Data are safeguarded against loss of availability and to ensure the integrity and confidentiality of the information.

Lastly, we apply the Secure Sockets Layer (SSL) to interactive websites (My account, Data Correction, My Connections, remote metering) with 128-bit encryption which ensures the confidentiality and inviolability of your transactions and personal data.

EYDAP is engaged in a continuous process of bringing its practices into line with and complying with the terms of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of data, and is constantly making concerted efforts to ensure compliance.

- **What happens if your data is breached**

Despite EYDAP S.A.'s due diligence when it comes to the processing of your personal data, it is ready to address any breaches in good time, to safeguard you as best as possible.

If your personal data is breached you are obliged to promptly inform EYDAP once you realise that there is a potential personal data breach, by notifying us of the nature of the personal data breach. Some examples include: 1) *Loss of correspondence or correspondence being read by unauthorised recipients*, 2) *hacking*, 3) *malware such as viruses or ransomware*, 4) *phishing*, 5) *erroneous publication/disclosure of data*, 6) *revealing / providing / sending the wrong person's data*, and 7) *erroneously spreading information orally*.

Check whether the breach was due to your own fault and collect all information needed which EYDAP S.A. can use to manage the incident.

- **Contact details**

**Useful contact phone numbers:**

**A) Particulars of the Controller:**

EYDAP S.A.  
Address: 156 Oropou St.  
Tel.: 1022  
Email [grammateia@eydap.gr](mailto:grammateia@eydap.gr)

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**B) Details of the Personal Data Protection Officer (DPO):**

Marianna Alboura

Tel.: +30- 2107495156 & +30-2107495356

e-mail: [dpo@eydap.gr](mailto:dpo@eydap.gr)

**C) Particulars of Hellenic Data Protection Authority:**

Offices: 1- 3 Kifissias Avenue, GR-115 23, Athens

SWITCHBOARD: +30- 2106475600

Fax: +30- 2106475628

Email [contact@dpa.gr](mailto:contact@dpa.gr)

Having read this document, consumers take cognizance of the said processing which is in accordance with Regulation (EU) 2016/679 and the recitals thereto, solely for the purposes stated above and for the purposes compatible with them.