



GDPR Annexes (from ANNEX 1 to ANNEX 4)



Description of the processing of personal data

With reference to art. [insert reference to art. of the Contract] of the Contract [insert reference to the number of the Contract] and in particular to the appointment of the company [insert name of the company that is appointed as Data Processor] as Data Processor, with this Annex it is intended to specify that the aforementioned processing will involve the following types of data and categories of data subjects.

A. Categories of Personal Data

- Biographical data¹
- Particular Categories of Personal Data²
- Judicial data
- economic and financial Personal Data³
- Data relating to Contracts with Customers⁴
- Contact Data or Access Data ⁵
- Profiling Data
- Data relating to identification / recognition documents⁶
- Geolocation data
- Statistical data
- Categories of personal data (free text) _____

B. Categories of Data Subjects

- Business Partner
- Supplier
- Client, Prospect
- External Subject
- Underage
- Employees
- Executives Employees
- Shareholders
- Executives Employees of other companies
- Other Categories (free text) _____

¹ For example: name, surname, sex, date of birth, place of birth, social security number, other

² For example: political views, religion, racial origin, health, sexual orientation, other

³ For example: bank account number, credit card, other ...

⁴ For example: POD- PDR-

⁵ For example: postal or e-mail address, mobile landline number

⁶ For example: identity card, passport, driving license, CNS, other ...



Annex 2 GDPR

SELF DECLARATION

of Appointment of Persons Authorized to Process Personal Data pursuant to art. 29 of EU Regulation 2016/679 (GDPR)
(Presidential Decree 28 December 2000, n.445) (D.P.R. 28 dicembre 2000, n.445)

Dear
ENEL

The undersigned (surname) (name).....

born in(.....) on.....

resident..... (.....) (street/square) n.

As legal representative of the Company

with headquarter in(.....) (street/square) n.
.....

Tax CodeVAT.....

in relation to Contract no.

as Data Processor, aware of the criminal sanctions referred to in Article 76 of the Presidential Decree 28.12.2000 n.445, in case of false declarations and formation or use of false documents, on its own responsibility

DECLARES

- a) that it has appointed his employees / collaborators in relation to the activities referred to in the aforementioned contract, as "Authorized Persons" to process personal data according to art. 29 of the GDPR and that this appointment includes the minimum requirements set out at the bottom of this declaration;
- b) that the Sub Processor, if any, which carry out the activities referred to in the aforementioned contract, have appointed their employees and collaborators "Authorized Persons" to process personal data according to art. 29 of the GDPR;
- c) that a copy of the appointments is available for ENEL.

ATTACH

The list of Authorized Persons who must be approved to operate directly or indirectly on Enel's systems;

UNDERTAKES

to update the documentation before the start of activities:

- in case of new employees / collaborators will process personal data,; and
- within five working days from the moment the employees / collaborators will not process any more personal data.

Date

Signature



Annex 2 GDPR

Information and minimum instructions for the performance of tasks relating to the processing of personal data by Authorized Persons

In particular, it is specified that:

- The processing of personal data must be carried out lawfully and correctly;
- Personal data must be collected solely for purposes related to the activity carried out, exclusively during working hours and in any case no later than the necessary time;
- Without prejudice to the above, in the exceptional hypothesis of processing personal data carried out outside working hours, the Authorized Person must ensure that he has closed the work session ("log-off") so that the credentials of access for subsequent use;
- It is necessary to constantly check the data and update them;
- Constant verification of the completeness and accuracy of the data processed is necessary;
- The possible phase of consent collection must be preceded by specific information and by the release of the consent of the data subjects, which must be free, specific and in writing or in any case specifically documented;
- In the event of interruption, even temporary, of work, it is necessary to ensure that the data processed are not accessible to unauthorized third parties, by making a specific log-off;
- Your authentication credentials must be confidential and as such used only by the Authorized Person;
- Maximum confidentiality must be guaranteed in each processing operation.

In particular, Authorized Persons are required to:

- a) access only personal data whose knowledge is strictly necessary to fulfill the assigned tasks and no later than the necessary time;
- b) do not leave company documents unattended or exposed to the vision of subjects in any case unrelated to processing, with particular reference to those containing sensitive and judicial data, take care of the necessary confidentiality of the data in question, implementing - also on the basis of the provisions issued by Company - suitable precautions to prevent others, unauthorized, from accessing the aforementioned data;
- c) not to disclose, communicate the data it has come into possession, outside of the cases permitted by law or provided for by contractual regulations and to maintain due confidentiality with regard to the information that has come to knowledge during the course of the assignment even when the assignment itself has ceased;
- d) not to massively download personal data without prior communication and authorization from the Data Controller or Data Processor;
- e) in any case, keep with care and appropriate diligence the paper documentation entrusted in carrying out the work activity, containing sensitive data and those relating to registrations of criminal record, in cabinets or drawers equipped with locks and observe the procedure provided (indication in the " special register of one's name, time and date of access, retrieval / return of the document) for access to the archives that store the aforementioned data;
- f) adopt and scrupulously comply with the requirements dictated by the Data Controller or the Data Processor regarding technical and organizational measures adequate to ensure a level of security appropriate to the risk (pursuant to art. 32 of the GDPR);
- g) in particular, for data processing to be carried out with electronic or in any case automated tools, comply with any specific authorizations / qualifications and the storage methods and tools provided by the Data Controller or Data Processor;
- h) inform the Processor in case of accidents involving the personal data being processed, in particular if sensitive and / or judicial.



Annex 3 GDPR

List of Sub-processors

| COMPANY | COUNTRY AND ADDRESS OF THE REGISTERED OFFICE | PRODUCT OR SERVICES PROVIDED | CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED | ADEQUATE GUARANTEES AND EXCEPTIONS FOR THE INTERNATIONAL TRANSFER OF PERSONAL DATA |
|----------------|---|-------------------------------------|--|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Date

Signature of the Processor.....



Annex 3 GDPR

SELF DECLARATION

(to be filled only in cases where the adequate guarantee for the transfer consists of Standard Contractual Clauses)

Dear
ENEL

The undersigned (surname) (name).....

born in(.....) on.....

resident..... (.....) (street/square) n.

As legal representative of the Company

with headquarter in(.....) (street/square) n.
.....

Tax CodeVAT.....

in relation to Contract no.

as Data Processor, aware of the criminal sanctions referred to in Article 76 of the Presidential Decree 28.12.2000 n.445, in case of false declarations and formation or use of false documents, on its own responsibility

DECLARES

With reference to the Sub-Responsible Officers listed above

- a) to arrange for a prior Data Transfer Impact Assessment ("DTIA") to be carried out in relation to the transfer of personal data underlying the Contract and to take all necessary additional security measures where required;
- b) to enter into Standard Contractual Clauses with the Sub-Contractors it may use to perform the activities under the Contract;
- c) to update and re-evaluate the DTIA at regular intervals, checking whether there have been any changes in the specific circumstances of the transfer and/or regulatory changes in the legislation of the country of destination of the transferred data that may affect the level of security of the transfer
- d) to make available a copy of the signed SCCs and of the DTIA carried out, upon ENEL's simple request.

Date

Signature of the Processor.....



Annex 4 GDPR

REF. CONTRACT NO. _____

ANNEX 4 GDPR

**REQUEST FOR AUTHORISATION OF APPOINTMENT OF SUB-PROCESSOR(S) PURSUANT TO ARTICLE 28 OF EU
REGULATION 2016/679 (HEREINAFTER REFERRED TO AS "GDPR")**

The Company [*insert the name of the company appointed as Processor*], in its capacity as Processor appointed by [*insert the name of the Controller company*], Controller

WHEREAS:

- for the performance of specific processing activities related to the execution of the above-mentioned Contract, it needs to engage subjects external to its organization;
- for these purposes, the Company/Companies [*insert name of the company/companies appointed as Sub-Processor/s*] has/have been identified;
- pursuant to Article 28 of the GDPR, such Company/Companies must be appointed as Processor/s.

REQUESTS

to [*insert the name of the Controller company*], in its capacity of Controller, the authorization to appoint the Company/Companies [*insert name of the company/companies appointed as Sub-Processor/s*] as Sub-Processor/s and

DECLARES

- that such appointment shall contain the same instructions given by the Controller for the performance of specific processing activities related to the performance of the Contract;
- declares that, together with this Annex, it will provide the Controller with the duly updated list of Sub-Processors, by filling in the section "*Communication of amendments to the list of Sub-Processors*" of this Annex;

[Date] _____,

The Processor

For authorization

The Controller



Annex 4 GDPR

COMMUNICATION OF AMENDMENTS TO THE LIST OF SUB-PROCESSORS

(to be filled in when there is a need to update the list of Sub-Processors set out in Annex 3 GDPR, notifying the addition of new Sub- Processors or the deletion of some of those previously indicated)

The Supplier hereby gives notice that it no longer makes use of the following Sub-Processors:

[*]

Below is the updated list of Sub-Processors.

| COMPANY | COUNTRY AND ADDRESS OF THE REGISTERED OFFICE | PRODUCT OR SERVICES PROVIDED | CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED | ADEQUATE GUARANTEES AND EXCEPTIONS FOR THE INTERNATIONAL TRANSFER OF PERSONAL DATA |
|----------------|---|-------------------------------------|--|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Date

Signature of the Processor



Annex 4 GDPR

SELF DECLARATION

(to be filled only in cases where the adequate guarantee for the transfer consists of Standard Contractual Clauses)

Dear
ENEL

The undersigned (surname) (name).....

born in(.....) on.....

resident..... (.....) (street/square) n.

As legal representative of the Company

with headquarter in(.....) (street/square) n.

Tax CodeVAT.....

in relation to Contract no.

as Data Processor, aware of the criminal sanctions referred to in Article 76 of the Presidential Decree 28.12.2000 n.445, in case of false declarations and formation or use of false documents, on its own responsibility

DECLARES

With reference to the Sub-Responsible Officers listed above

- a) to arrange for a prior Data Transfer Impact Assessment ("DTIA") to be carried out in relation to the transfer of personal data underlying the Contract and to take all necessary additional security measures where required;
- b) to enter into Standard Contractual Clauses with the Sub-Contractors it may use to perform the activities under the Contract;
- c) to update and re-evaluate the DTIA at regular intervals, checking whether there have been any changes in the specific circumstances of the transfer and/or regulatory changes in the legislation of the country of destination of the transferred data that may affect the level of security of the transfer
- d) to make available a copy of the signed SCCs and of the DTIA carried out, upon ENEL's simple request.

Date

Signature of the Processor