

NOTICE ON THE PERSONAL DATA PROCESSING

This notice (hereinafter referred to as the "Notice") explains the scope and manner in which our company Slovenské elektrárne, a. s., with its registered office at Pribinova 40, Bratislava 811 09, Slovak Republic, Company Reg. No.: 35 829 052, registered in the Commercial Register of the City Court Bratislava III, Section: Sa, File No.: 2904/B, <https://www.seas.sk/kontakt>, data protection officer's e-mail address: dpo@seas.sk (hereinafter the „Company“) processes your personal data for the following purposes:

1. Preparation and procurement of goods, works and services

For this purpose, we process your personal data in the event that you are (i) a natural person (including a self-employed person) who is an applicant/tenderer in the procurement, (ii) statutory representative, manager, employee and other representative, official or contact person of the legal person who is the applicant/tenderer, (iii) a natural person who has otherwise participated/participates or intends to participate in the supply of goods, the performance of works or the provision of services to the Company, (iv) a natural person who, in the past or present, has supplied/supplies goods, has performed/performs works, has rendered/renders services or (v) if you are a close person to a natural person who is an applicant/tenderer, employed in the Company, (vi) a person holding the position of senior manager in the Company, (vii) a person holding the position of a permanent auditor of the Company, (viii) a person employed in the Company and being part of the organisation structure of the applicant; or (ix) a close person of the persons listed in (vi), (vii) and (viii) and employed within the Company.

For this purpose, we collect and process following personal data categories: identification data, contact details, employment data, data related to procurement, data related to the assessment of contractors (natural persons, including self-employed persons) for contractual performances, which include personal data in the scope: academic degree, first name, surname, permanent or temporary place of residence, date of birth, place of birth in the Company structure declaration (juridical person) or Individual declaration (natural person), ID card number, or other identification document, rarely also birth identification number, signature, business name, place of business, entry in the register and entry number, company registration number, VAT registration number, contact address, telephone number, e-mail address, department, job position, job function, data on attained education, professional qualification /competence/ certification, previous experience, previous and current job categorisation, profession, employer, other personal data included in CVs, supporting documents (e.g. CVs, diplomas and other educational qualifications, certificates, certificates of professional competence), the relationship of workers to the supplier (employee, subcontractor, self-employed person), previous contracts, references for contractors, other information related to the fulfilment of personal, financial and economic position and, in the context of the verification of position, data from public sources and databases (data on the owners and persons authorised to act on behalf of the contractor, such as on the website of Slovak Republic Company register or Public register and Czech Republic Collection of documents, data on the connection of persons to other companies or close persons on the website Social network of companies at www.foaf.sk, data from the cadastre of real estate at www.cica.vugk.sk, data from the list of entrepreneurs, registers of references, the register of persons banned from activity and the register of end users of benefits at www.uvo.gov.sk, data on debtors at www.dlznik.zoznam.sk, data on payment of public health insurance on the website of health insurance companies, data on payment of social insurance on the Social Insurance Institution website, data on economic status on the website www.registeruz.sk, www.finstat.sk), data from the Financial Administration's information lists on www.financnasprava.sk, tax payment data on the Financial Administration's website www.financnasprava.sk information on integrity in the form of an affidavit in the case of a foreigner and information contained in a criminal record extract, in connection with the Declaration of an individual (natural person) and the Declaration about company structure (juridical person), information on the ownership, control or otherwise close or significant relationship of the data subject to the Company, its statutory bodies, managers is processed, employees or other representatives, or to other companies in its group (for example, information on the name, surname, position/function of a close person employed by the Company, information on the Company's permanent auditor), or identification and contact details

provided in the profiles of candidates/candidates in the electronic platforms for candidates/candidates for supply by the contracting authority or contracting entity.

The legal basis for the processing of your personal data is the legitimate interest of the Company. The legitimate interest lies in the rapid and efficient completion of the most advantageous - in terms of economics and quality - business transactions (delivery of goods, provision of works and services) and in the use of qualified and reliable suppliers to ensure quality performance. The procurement of goods, works and services by the Company as a contracting authority in accordance with the procedure laid down in Act No. 343/2015 Coll. on Public Procurement, as amended (hereinafter referred to as the Public Procurement Act or "PPA"), implies the legitimate interest of the Company to process your personal data as per PPA, in particular based on § 38 in conjunction with § 32 to 36, § 40 of the said Act, which lay down the terms and conditions for participation which may relate to personal, financial and economic status, as well as technical or professional qualifications. Details of data related to finding somebody guilty for crimes and misdemeanours / minor offences, we process on the basis of a generally binding legal regulation of the Slovak Republic, namely as. Art. 32 of Act No. 343/2015 Coll. on Public Procurement as later amended.

In the event that you are a natural person (including a self-employed person) who is an applicant/tenderer, we shall collect the personal data to be processed from you. Personal data of statutory representatives, managers, employees and other representatives, officers and contact persons of legal entities are obtained by the Company from legal entities that are candidates/tenderers. Personal data of natural persons who otherwise participate, have participated or intend to participate in the delivery of goods, performance of works or provision of services to the Company may be obtained by the Company from the candidate/tenderer. Company may obtain personal data of natural persons, who are bidders from public sources or databases (for example, Slovak Republic Company register, Public register and Collection of documents of Czech Republic, data on the connection of persons to other companies or close persons on the website Social network of companies at www.foaf.sk, data on debtors at www.dlznik.zoznam.sk, data from the cadastre of real estate at www.cica.vugk.sk, data on payment of public health insurance on the website of health insurance companies, data on payment of social insurance on the Social Insurance Institution website, data from the Financial Administration's information lists on www.financnasprava.sk, tax payment data on the Financial Administration's website www.financnasprava.sk). Personal data of a person close to a natural person who is a candidate/tenderer employed by the Company; personal data of a person holding the position of senior manager in the Company or the position of permanent auditor of the Company; personal data of a person who is employed by the Company and is involved in the organisation structure of the candidate or personal data of their close persons employed in the Company; shall be provided to the Company by the candidate/tenderer in a Statement on the structure of the company (juridical person) or in a Statement provided by the individual (natural person).

As part of the above activities, we shall provide personal data to the companies providing external services and solutions for procurement processes (e.g. auction portals, procurement systems), to the state authorities (e.g. the Public Procurement Office), to the operator of the public central register of procurement documents (www.uvo.gov.sk), law enforcement agencies, courts, and to the contractual partners of the Company, whose contracts oblige our Company to collect and process personal data in the context of procurement. Your personal data being processed shall not be transferred to a third country nor shall it be transferred to any international organisation. We shall process personal data in the procurement documentation for a period of 10 years, commencing from the end of the procurement process. We shall process personal data included in the procurement requirements and in connection with the qualification of suppliers for a period of 5 years from the end of the procurement process.

Provision of your personal data is not a statutory nor contractual requirement, nor a requirement necessary for concluding a contract. In the event that the Company announces public procurement using procedure as per Act No. 343/2015 Coll. on Public Procurement as later amended, the provision of your personal data related to the integrity of Company is a legal obligation and refusing to provide your personal data may result in failure to participate in public procurement organized by the Company.

2. Verification of the economic, sanction and other status of persons in potential and existing contractual relationships with the Company

It is for this purpose that we process your personal data, in the event that you are (i) a natural person - entrepreneur, (ii) a member of the company's statutory body, (iii) a member of the company's supervisory body, (iv) the final beneficiary, (v) the owner of the company or (vi) a high-ranking manager of the company with which the Company has a contractual relationship or plans to enter into one, or if you are (vi) an employee of the Company.

For this purpose, we collect and process the following categories of personal data: identification data, data relating to the performance of the function, information regarding verification of the persons' status, contact data and - as part of the above data - personal data including the title, first name, family name, date of birth, position or relationship to the company being audited, residence address, activity in other companies, nationality, presence in the list of sanctions, telephone number, e-mail address, information on the performance of a significant public function (PEP).

The legal basis for the processing of your personal data is the legal obligation of the Company and the legitimate interest of the Company. The legal obligation of the Company to process your personal data arises from Act No. 289/2016 Coll. on the implementation of international sanctions, as amended, and on the applicable legally binding acts of the European Communities and of the European Union concerning restrictive measures. A current list of these regulations can be found in the Legislation column at <https://www.sanctionsmap.eu/#/main> (including Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine). During the processing of your personal data, it is in the Company's legitimate interests to: (i) ensure that the Company does not enter into or maintain business or other relationships with third parties (whether these include individuals, companies, institutions, organizations or states) which are in violation of the sanctions which the Company must comply with, (ii) prevent establishing relations with unreliable or malicious entities and protect the activities of the Company, its representatives, employees and business partners against economic or reputation damage; and (iii) apply the principles of responsible and transparent business adopted by the Company.

If you are a natural person - entrepreneur, we shall collect the processed personal data directly from you. In other cases, if you are a member of the statutory body in a company, a member of the company's supervisory body, a final beneficiary, an owner of the company and a high-ranking manager of the company with which the Company has established contractual relationship or plans to enter into one; we shall collect your personal data from that company. We shall obtain the data regarding the presence in the sanction lists of the persons concerned, by examining the sanction lists issued by the sanction authorities that are relevant from the point of view of the Company. The Company examines the lists of the following sanction authorities: the Slovak Republic, EU, United Nations, United Kingdom, United States of America (OFAC, Department of Commerce, Department of State), World Bank, European Bank for Reconstruction and Development, European Investment Bank, Netherlands and the Czech Republic.

As part of these activities, we shall provide your personal data to the Slovak Information Service and to the relevant state administration authority. Your personal data being processed shall not be transferred to a third country nor shall it be transferred to any international organisation. We shall process your personal data for a period of 10 years from the date of termination of the Company's relationship with the subject under review.

Providing your personal data is required by law in cases where the verification of the economic, sanction and other status of persons with the aim to ensure compliance with sanctions is required by the EU and Slovak law (i.e. when verifying the lists of sanction authorities, such as the Slovak Republic, EU, UN). Refusal to provide your personal data may result in the Company's inability to enter into or to maintain a contractual relationship with the entity subject to the Company's review. In cases where the verification of the economic, sanction and other status of persons with the aim to ensure compliance with sanctions is not required by the EU and Slovak law, as well as in cases of verification of the counterparty in view of the commercial, reputation, security, economic or other similar risks, the provision of your

personal data is not required by law but it is a necessary requirement to conclude a contract with the entity which is subject to review by the Company.

3. Preparation and implementation of contractual relations including determination of authorised and contact persons

For this purpose, we process your personal data if you are (i) a member of the statutory body of a company, (ii) a person authorized to act on behalf of the company, (iii) a natural person (including a self-employed person) if it is a party to the contract and (iv) an employee of the company (in particular, a contract manager, contact person, or an executive).

For this purpose, we collect and process the following categories of personal data: identification data, employment data, contact data, payment data and - as part of the above data - personal data including the title, first name, family name, date of birth, permanent address, ID card number, business name, place of business, registration and registration number, business ID number, VAT ID number, signature, job position, function, company identification information, personal number, phone number, email, account number, and bank code.

The legal basis for the processing of your personal data shall be the contract and pre-contractual relations, the legal obligation of the Company and the legitimate interest of the Company.

The legal obligation of the Company to process your personal data results from § 20, § 22, § 31 and § 415 of Act No. 40/1964 Coll. The Civil Code, as amended, and from § 13 of Act no. 513/1991 Coll. Commercial Code, as amended. The legitimate interest of the Company in the processing of your personal data shall be the effective performance of contractual obligations by the parties.

We shall collect your personal data directly from you if you are a member of the Company's statutory body, a person authorized to act on behalf of the Company, natural person - contracting party - or an employee of the Company. If you are a member of the statutory body of the other contracting party, a person authorized to act on behalf of the other contracting party, a contact person or an employee of the other contracting party, we shall collect your personal data from the contracting party.

As part of these activities, we shall provide your personal data to our contract partners, lawyers, courts, including courts of arbitration, Public Procurement Office, provider of the information system for procurement management, and to the cloud service provider. We shall process your personal data for a period 10 years from the expiry of the contract.

When processing your personal data (if relevant in a particular case), the data shall be transferred to a third country on the basis of the Commission's Decision No 2021/1772 on adequate protection of personal data (United Kingdom of Great Britain and Northern Ireland), Commission Decision No. 2000/518/EC on adequate protection of personal data (Switzerland), and Commission Decision No 2002/2/EC on adequate protection of personal data (Canada) and derogations within the meaning of Art. 49 par. 1 (b) of the General Data Protection Regulation (Russian Federation, US, United Arab Emirates, Ukraine, China, Serbia, Singapore, Australia, India, Armenia).

In the event that you as a natural person are a party to a contract, the provision of your identification and payment information is a necessary requirement to conclude a contract. Should you fail to provide such data to the Company, we may not conclude a contract with you. If you are a member of a statutory body or a person authorized to act on behalf of the company, you are required by law to provide your personal data. Should you fail to provide the data, the Company may not effectively conclude the contract with you. In other cases, the provision of personal data is not required by law or by contract, nor it is a necessary requirement to conclude a contract.

4. Verification of compliance of persons' activities with internal regulations, law regulations, whistleblowing, performance of internal audit and cooperation with responsible authorities

We shall process your personal data for this purpose:

in the field of Whistleblowing (reporting anti-social activity), if you are:

- a person submitting the notification who is in employment relationship with the Company,
- a person being identified in the notices (i.e. an employee and another person working for the Company, a member of Company bodies and another representative of the Company, a person related to the contractual partners of the Company, as well as a close person of any of the listed persons, or an otherwise relevant third party within the subject matter of a particular notice)

in the area of the Code of Conduct, Plan for zero tolerance of corruption, conflict of interest and for giving and receiving gifts, if you are:

- the person submitting the complaint (i.e. other persons working for the Company, a member of Company bodies and another representative of the Company, a person related to the contractual partners of the Company, and also a third person - the general public),
- a person being identified in the complaints (i.e. an employee and another person working for the Company, a member of Company bodies and another representative of the Company, a person related to the contractual partners of the Company, as well as a close person of any of the listed persons, or an otherwise relevant third party within the subject matter of a particular complaint)

in the field of audit, if you are:

- a person in an employment and similar relationship with the Company and close person thereof,
- a person in another relevant relationship with the Company (in particular, a member of Company bodies and another representative of the Company, and also a close person of any of the above persons),
- a person in an employment or similar relationship with the contractual partners of the Company or their close person,
- a person in another relevant relationship with the Company's contractual partners (in particular, another person related to the contractual partners of the Company, members of Company bodies and another representative of companies, and also a close person of any of the above persons, or a third party otherwise relevant in the performance of an audit)

For this purpose, we shall collect and process the following categories of personal data:

in the field of whistleblowing (reporting anti-social activity):

- identification data (such as first name, family name, address of permanent residence, signature, or date of birth), contact details (e.g. e-mail, telephone, address of temporary residence), employment data (e.g. personal number, job title), whistleblower's relationship to the Company or to the reported activity or reported person, relationship to the persons identified in the report, business activities, property ownership and other relationships to third parties, close persons and other data that the reporting party shall indicate in the whistleblowing report, as well as data processed by the Company which are necessary for proper verification and handling of the report in question

in the area of the Code of Conduct, the Plan for zero tolerance of corruption, conflict of interest and the act of receiving or giving gifts:

- identification data (such as first name, family name, address of permanent residence, signature), contact details (e.g. e-mail, telephone, address of temporary residence), employment data (e.g. personal number, job title), and other data, such as business activities, property ownership and other relations to the third parties, close persons and other information that the reporting party shall state in their report on suspected violation of the Code of Conduct, Plan for zero tolerance of corruption, data related to the conflict of interests of the data subject, and to the giving or receiving gifts, as well as data processed by the Company which are necessary for proper handling of the report in question

in the field of audit:

- identification information (such as title, first name and family name, date of birth, address of permanent residence), contact details (e.g. e-mail, telephone number, address of temporary residence), employment data (e.g. employee's personal number, job title), business activities, property ownership and other relationships to third parties, close persons, relationship to the

Company or third parties, and other data that are necessary for the performance of the internal audit.

The legal basis for the processing of your personal data is the legal obligation of the Company and the legitimate interest of the Company. The legal obligation of the Company to process your personal data arises in particular from § 7 and § 10 of Act No. 54/2019 Coll. on the Protection of Persons Reporting Anti-social Activities, as amended. The legitimate interests pursued by the Company in the processing of personal data include (i) the application of the principles of responsible and transparent business adopted by the Company, (ii) prevention and detection in the implementation of the Company's activities of unlawful or non-transparent actions of employees or other representatives of the Company or its contractual partners, (iii) building the reputation and transparency of the Company and promoting international, national, sectoral or other activities in the field of fight against corruption and other anti-social activities; and (iv) the application of international standards for the professional practice of internal audit.

The Company shall obtain your personal data from you in the event that you are submitting the notice or complaint to the Company. If you are a person whose personal data is stated in the notice or complaint, the Company shall collect your personal data from the person submitting the notice or complaint. Your personal number, work email, business phone number and job title shall be provided by the Company. In the review process of the notice or complaint the Company may also obtain the personal data from publicly available sources (e.g. Commercial Register of the Slovak Republic, Trade Register of the Slovak Republic).

As part of the above activities, we shall provide the personal data to the Office for the protection of reporting persons, to the law enforcement agencies and to the authorities handling the offenses or other administrative offenses. In case of whistleblowing notices we shall process your personal data for a period of 3 years from the receiving of such notice (keeping of notices). In the event of complaints within the meaning of the Plan for zero tolerance of corruption, conflict of interest, giving or receiving gifts and auditing, we shall retain your personal data for a period 10 years from the closing of the complaint/audit.

The provision of personal data which is necessary for reporting to the Company of anti-social activities is required by law. Refusal to provide personal data shall result in the Company's failure to review the complaint and to comply with legal requirements. Providing other personal data is not required by law, neither by a contract, nor it is a requirement necessary to enter into a contract. Your personal data being processed shall not be transferred to a third country, nor shall it be transferred to any international organisation.

Together for the above processing purposes:

As a data subject you have, in case of processing based on the Company's legitimate interest, on the Company's legal duty obligation or the contract and pre-contractual relations: (i) the right to access the personal data (ii) the right to amend the personal data; (iii) the right to have the personal data erased (the so-called "right to be forgotten"); (iv) the right to request the restriction of personal data processing; (v) the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic. The current contact details of this office and further instructions for making such a request are published on the website of the office www.dataprotection.gov.sk. In addition to the aforementioned rights, for processing based on the lawful interest of the Company, **you also have the right to object the personal data processing on the basis related to your particular situation** and in the processing based on the contract and precontractual relationships, the right to transferability. For more information on the aforementioned rights of the data subject and the conditions of processing, please visit the Company's website at: www.seas.sk/gdpr. As a data subject, you may exercise your rights at any time with our Company in the following ways: in person, at the registered office of our Company mentioned at the beginning of this Notice; in writing, by sending the request in question to the address of our Company mentioned at the beginning of this Notice; or electronically - by e-mail, by sending the request in question to the e-mail address of the responsible person dpo@seas.sk; or by using the unified form available at: www.seas.sk/gdpr. There is no automated decision-making or profiling in the processing of your personal data.