

VIBES Loyalty Program

Information on Personal Data Processing

Data Protection Officer

The company under the name "HERON SINGLE MEMBER S.A. ENERGY SERVICES", and the distinctive title "HERON ENERGY S.A.", member of the GEK TERNA Group (hereinafter referred to as the "Company"), having its registered office in the Municipality of Athens, 85, Mesogeion Ave., with offices in Athens, 124, Kifisias Ave., P.C. 11526, e-mail: info@heron.gr, website: <https://www.heron.gr>, notifies that, in order to carry out its business activities, it processes personal data of subjects, natural persons (its customers) in the context of the operation of the customer loyalty Program "VIBES", in accordance with applicable national legislation and European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter referred to as the "Regulation"), as in force.

For any issue regarding personal data processing, you can directly contact our Data Protection Officer (DPO) at the email address: herondpo@gr.AndersenLegal.com.

Personal Data Categories:

We process the personal data that you submit to us, such as your full name, and in case you fill it out, we may process your date of birth in order to reward you on your birthday.

We also process data generated by your responses to the VIBES Program queries.

Personal Data Processing Purposes

Your personal data is collected and processed by the Company:

- i. for your registration and the execution of the VIBES loyalty Program's terms (such as providing members with participation privileges and conducting non-commercial communication about members' participation in the program, the terms and conditions, information about loyalty points and their redemption history, and so on).
- ii. to provide you with information about products and services. Upon the provision your consent, you will be able keep updated with regards to our new services and offers, that we promote via Push Notifications.
- iii. for the creation of member profiles, on the basis of which the respective offers - privileges from the participating stores will be displayed in priority in the app. More information about profiling can be found in the relevant Consent Form.

Legal grounds for personal data processing

The Company processes your personal data in the context of the VIBES loyalty Program based on your legal consent for the provision of services and benefits to program participants.

The Company may also, with your explicit consent, contact you via Push Notifications with news, offers, and personalized updates.

Personal Data Recipients

Your personal information is disclosed by the Company to the following categories of recipients:

- Company Employees

Employees of our company who are competent for editing your VIBES Program profile and assisting you in collecting loyalty points.

We handle your personal data in the strictest confidentiality and secrecy, since all employees who process your personal data have an adequate and significant level of knowledge on their protection and are bound by a confidentiality clause or are under an appropriate regulatory obligation to comply with the confidentiality clause.

- Our Company's partners

The Company retains partners to whom it delegates personal data processing on its behalf. Specifically, the company under the tradename "DESQUARED IT SERVICES SOCIETE ANONYME" has been assigned with the operation and support of the "WAVE" platform, where coupons and offers of the participating stores are registered on.

In this case, the Company remains responsible for the processing of your personal data and determines the individual elements of the processing, and thus signs a special contract with the partners to whom it assigns the execution of activities that require personal data processing, in order to ensure that such processing is in compliance with the applicable legal framework and that every natural person can freely and unhindered exercise the rights granted to them by the legal personal data protection framework.

Personal Data Retention Period

The Company will retain and process the VIBES member's personal data until the member requests his deletion from it.

Data Subjects' Rights

Each member, as a personal data subject, may at any time exercise their rights, as provided for in General Data Protection Regulation 679/2016 EU (in particular articles 12 to 23 thereof) and national legislation, in particular:

- i. the right to access his/ her personal data processed by the Company as part of the VIBES Program;
- ii. the right to restrict the processing of their data related to the VIBES Program;
- iii. the right to rectification or deletion (right to be forgotten) of his/her personal data related to the VIBES Program;
- iv. the right to object, i.e. to object to the processing of his/ her personal data related to the VIBES Program;
- v. the right to the portability of his/ her data related to the VIBES Program;
- vi. the right to withdraw his/ her consent; and
- vii. the right to submit a complaint before the Hellenic Data Protection Authority (www.dpa.gr) online, via its web portal: <https://eservices.dpa.gr/>.