# Data protection for suppliers, business contacts, freelancers, and their employees

As of September 2025

We, EnBW Energie Baden-Württemberg AG, take the protection of your personal data very seriously. On the following pages, we would like to inform you about how we process your data and what rights you have with regard to your personal data.

## 1 Who is responsible for processing your data and how can you contact the Data Protection Officer?

Responsible for processing your data:
EnBW Energie Baden-Württemberg AG
Durlacher Allee 93
76131 Karlsruhe
Phone: +49 721 63-00
Email: kontakt@enbw.com

If you have any questions, suggestions, or complaints, you can reach us using the contact details provided above.

You can contact our Data Protection Officer at datenschutz@enbw.com. He will be happy to assist you with any questions regarding data protection.

## 2 What categories of personal data are processed, and where does the data come from?

(1) We process the personal data that we have received from you or your company/employer. This includes, in particular: name, first name, business contact details (e.g., business address, telephone number, email address), as well as other personal data that you provide to us as part of our business relationship, such as inquiries to our customer service, messages in online portals, or your responses to customer surveys.

(2] In addition, we also process data that we have lawfully obtained from other sources. This includes, in particular: data that we obtain from public sources, e.g., from your company's website, commercial registers, address databases, company directories, or from other EnBW Group companies with which you have business relationships.

(3) If you provide us with a performance or competency profile of one of your employees in the form of a document or online access, we assume that the necessary obligations in this context (particularly under Article 13 GDPR) have been fulfilled as part of the employment or contractual relationship between you and the individual concerned. The responsible entity within the meaning of the GDPR is the contractor. Our involvement relates to the internal provision for the purpose of internal information sharing within the EnBW Group and affiliated companies regarding the performance and competence profiles you offer.

## 3 For what purposes are your data processed and on what legal basis is this permitted?

We only process your data if we have either obtained your consent for data processing or if the processing is legally permitted.

### 3.1 Processing of your data for the purposes of contract initiation and/or contract execution (Article 6(1)(b) of the General Data Protection Regulation - GDPR)

We process your personal data for the purposes of establishing, fulfilling, and executing a business relationship with your company/employer. In particular, personal data is used for the purpose of contacting you. Additional purposes for data processing may arise from the respective contractual relationship. The details can be found in the contract documents in such cases.

### 3.2 Processing of your data based on legitimate interests (Article 6(1)(f) GDPR)

(1) In addition to processing your data for the purpose of fulfilling a contract, we also process your data based on our legitimate interest or the legitimate interest of a third party, provided that your interests worthy of protection do not outweigh ours. These include the following processing purposes:

- Processing your data for supplier/business partner management purposes, provided this is not already required as part of the establishment, fulfillment, and execution of a contract. This also includes the operation of supplier portals or conducting supplier evaluations.
- Sharing your data with the relevant contacts in our group companies for the purpose of expanding, shaping, and/or deepening the business relationships between your company/employer and our group.
- Processing your data for direct marketing purposes and direct contact – provided this is legally permitted or you have given us your consent.
- Conducting credit checks in connection with contract agreements.
- Conducting and further developing analyses to assess your interests and customer satisfaction, as well as creating customized offers for your company/employer accordingly.
- Further development of products and services.
- Assertion of legal claims and defense in legal disputes.
- Ensuring the security and operation of our IT systems as well as further development of these measures.
- Exercising our property rights, visitor management, and access controls.
- Trade fair and event invitations, as well as event and participant management, including video and film recordings of events.
- Prevention and investigation of criminal offenses.
- Measures for business management.
- Fraud prevention.
- Management of our business risks.
- Anonymization of data to enable extended analyses based on non-personal data.

(2) We process your data for the purposes mentioned in paragraph 1, where possible, in each individual case, in a pseudonymized form. This means that you can no longer be directly identified during the respective processing by us.

### 3.3 Processing of your data based on legal requirements (Article 6(1)(c) GDPR)

We are subject to various legal obligations, such as the Money Laundering Act, tax laws, commercial regulations, and energy-related regulations. The purposes of processing include fulfilling tax-related control and reporting obligations, sanctions list checks, fraud and money laundering prevention, concession management, as well as energy market communication processes.

### 3.4 Processing of your data based on consent provided by you (Article 6(1)(a) GDPR)

Data processing also takes place if and to the extent that you have consented to data processing in accordance with the requirements of Article 6(1)(a) GDPR. The purposes of data processing are determined by the respective consent.

## 4 To which categories of recipients is your data transmitted?

(1) We treat your data confidentially. Within EnBW Energie Baden-Württemberg AG, only the departments and employees who require access to your data to fulfill the aforementioned purposes will receive it.

(2) EnBW Energie Baden-Württemberg AG is part of the EnBW Group and collaborates with other group companies. The transmission of personal data to other group companies primarily occurs for the purposes mentioned in section 3.2, paragraph (1), points 1 and 2. Beyond this, personal data is only transmitted to other group companies if there is a legal basis for doing so and it is necessary for one of the other purposes mentioned above.

[3] Personal data is only transmitted to other third parties if it is necessary for the purposes mentioned above and legally permitted, or if you have previously given your consent. To fulfill our obligations, we rely on the assistance of service providers or other third parties. These include, in particular, the following categories of recipients who may receive data:

- Call centers
- IT service providers
- Marketing service providers
- Advertising agencies
- Logistics and postal service providers
- Printing service providers
- Consulting and advisory services
- Market and opinion research
- Debt collection agencies and lawyers
- Financial institutions and payment service providers
- Network operators
- Metering point operators
- Authorities
- Selected specialist companies, installers, craftsmen
- Data analysis specialists
- Document and data carrier disposal services
- Transportation companies as well as accommodation and hospitality businesses
- Balancing group management
- Commercial agents

- Sales agencies/distribution

(4) EnBW Energie Baden-Württemberg AG is part of the EnBW Group and collaborates in a division of labor with other group companies. The transmission of personal data to other group companies also only occurs if there is a legal basis for doing so and it is necessary for one of the purposes mentioned above.

## 5 Is the data also transmitted to recipients in countries outside the European Economic Area? How is an adequate level of data protection ensured?

(1) We also transmit your data to service providers and agents located in third countries outside the EU or EEA. Compliance with an adequate level of data protection is ensured based on adequacy decisions under Article 45 GDPR or through other appropriate safeguards under Articles 46 ff. GDPR. Please note that in the case of data transfers to third countries, there is still a general risk that an adequate level of data protection in line with European law may not be present, and data subject rights may not be fully enforceable. For data transfers based on Art. 46 et seq. GDPR, you can request a copy of the relevant guarantees from us using the contact details provided above.

(2) For data transfers via administrative access, access from another third country may also be possible, as system operability is often ensured based on the follow-the-sun principle. However, your data is not stored in additional countries. In these cases, data access only occurs if we have ensured compliance with an adequate level of data protection.

## 6 How long will your data be stored?

(1) We process and store your personal data as long as it is necessary for the purposes mentioned above and/or for legal retention obligations, and until all mutual claims have been fulfilled. Once the purpose underlying the collection has been fulfilled, the data is regularly deleted unless temporary further processing is required.

(2) Legal retention obligations of up to 10 years arise, for example, from the Commercial Code, the Tax Code, and the Money Laundering Act.

(3) In certain cases, limitation periods of up to 30 years may apply, making it necessary to retain your data to preserve evidence.

[4] The performance and/or competency profile(s) will be deleted immediately upon request by you or the respective data subject. However, there may be a time delay in cases of decentralized storage. As the procurement department, we will immediately cease processing the personal data of the data subject in accordance with Chapter 8 for the purpose described in Chapter 3, paragraph (3).

## 7 What rights do you have regarding your data?

Regarding the processing of your personal data, you have the following rights:

- Under Article 15 GDPR, you have the right to access the personal data processed about you. Please note the restrictions of Section 34 of the Federal Data Protection Act (BDSG).
- Under Article 16 GDPR, you have the right to correct inaccurate personal data.
- Under Article 17 GDPR, you have the right to delete personal data. Please note the restrictions of Section 35 BDSG.
- Under Article 18 GDPR, you have the right to restrict processing.
- Under Article 20 GDPR, you have the right to data portability.

**Right to Object under Article 21 GDPR**

If we process your data based on legitimate interests (Article 6(1)(f) GDPR) or for the performance of a public task (Article 6(1)(e) GDPR), and reasons arising from your particular situation oppose this processing, you have the right to object to this processing under Article 21(1) GDPR.

Additionally, under Article 21(2) GDPR, you have the right to object to any type of processing for direct marketing purposes.

You can submit your objection at any time without formal requirements. For the best possible processing, we kindly ask you to use the following contact details:

EnBW Energie Baden-Württemberg AG
Durlacher Allee 93
76131 Karlsruhe
Telefon: +49 721 63-00
E-Mail: kontakt@enbw.com

## 8 Can you revoke consents you have given?

If we process your data based on consent you have given, you have the right to revoke your consent at any time. Your data will then no longer be processed for the purposes covered by the consent. Please note that the legality of data processing carried out before the revocation is not affected by the revocation.

You can also direct your revocation to your contact person in our company for the best possible processing. If you do not have a direct contact person or do not wish to address them, you can also use the following contact details at any time:

EnBW Energie Baden-Württemberg AG
Durlacher Allee 93
76131 Karlsruhe
Telefon: +49 721 63-00
E-Mail: kontakt@enbw.com

## 9 Do you have the right to lodge a complaint with a supervisory authority?

If you believe that the processing of your personal data violates applicable law, you can lodge a complaint with a data protection supervisory authority at any time in accordance with Article 77 GDPR. This applies without prejudice to other administrative or judicial remedies.

## 10 Do you have to provide the data, or is the provision required for the conclusion of the contract?

You only need to provide us with the personal data that we require for the establishment, execution, and termination of our business relationship or that we are obligated to collect due to legal regulations. If you do not provide us with this data, we will have to decline the conclusion of the contract or will no longer be able to execute the contract.

## 11 Is automated decision-making carried out based on your data? If so, how is it done, and what impact does it have on you?

No, automated decision-making does not take place. Should this be the case in exceptional circumstances, we will inform you separately.

## 12 Can the data protection information change? Where can you find the most up-to-date version?

As our data processing is subject to changes, we will update our data protection information from time to time. If there are changes to the processing purposes, we will inform you directly. Otherwise, we publish updates to our data protection information at www.enbw.com/datenschutz, where you can always find the latest version. Additionally, you are welcome to contact us if you would like a printed copy of our data protection information sent to you by post.