

## PRIVACY NOTICE FOR SUPPLIERS AND POTENTIAL SUPPLIERS

Date: June 2026

Iberdrola , S.A. and the companies forming part of the Iberdrola Group (hereinafter, any of them and collectively, "Iberdrola") undertake to protect your privacy and to comply with the applicable legislation on the protection of personal data in each country in which the companies of the Iberdrola Group are domiciled (hereinafter, "**applicable data protection legislation**"), in particular, where applicable, the General Data Protection Regulation ("**GDPR**"). Your personal data will be processed lawfully, fairly and transparently, in accordance with specific purposes and only if the processing is appropriate, relevant and limited to what is necessary in relation to those legitimate purposes and supported by a valid legal basis. Furthermore, we will keep your data up to date and process it in such a way that your identification is only possible for as long as is necessary to fulfil the purposes of the processing, in accordance with applicable legislation.

Iberdrola has implemented the necessary technical and organisational measures to protect your data from accidental loss or unauthorised alteration, access, use or disclosure, and has established procedures to respond to any security incident that may affect your personal data.

Via this Privacy Notice (hereinafter, the "**Notice**"), we inform you about the processing of your personal data as an interested, qualified or contracted supplier of the Iberdrola Group – or representative or contact person – (hereinafter, "Supplier") due to the relationship established with Iberdrola as a Supplier, which requires the inclusion of your information in the Iberdrola Group's supplier management tool (hereinafter, interchangeably, the "Portal" or the "**Register of Potential Suppliers and Suppliers**" or "**Register**").

Notwithstanding the foregoing, certain processing of personal data may be subject to other specific privacy notices.

You should read this Notice and, where applicable, any updates to it, in order to understand how Iberdrola processes your personal data. Iberdrola may amend the Notice, in which case we will notify you where necessary via the Portal.

If, in the context of your relationship as an Iberdrola Supplier , you provide us with third-party data, such as the names, job titles and contact details of your employees, directors, shareholders or representatives or others, you undertake, prior to providing us with such data, to inform said third party of the processing of their data in accordance with the provisions of this Notice and, where applicable, to provide us with your consent or to obtain the third party's consent.

### 1. Who is responsible for processing your personal data?

The data controller for your personal data is the Iberdrola Group company with which you have a relationship as a Supplier, as it is the company that determines how and for what purposes your personal data is processed. You can find the full list of Iberdrola Group companies in Annex I of the corporate website: [https://www.iberdrola.com/documents/20125/42388/IB\\_Informe\\_Financiero\\_Anual.pdf](https://www.iberdrola.com/documents/20125/42388/IB_Informe_Financiero_Anual.pdf)

On occasion, Iberdrola, S.A. may act as the data controller for your personal data for the purpose of centralised, corporate management of the Portal.

We would like to inform you that also the companies within the Iberdrola Group have appointed Data Protection Officers, whom you may contact via or using the contact details provided below:

- Iberdrola, S.A.: [dpo@iberdrola.com](mailto:dpo@iberdrola.com)
- Other companies in the Iberdrola Group in Spain: [dpo@iberdrola.es](mailto:dpo@iberdrola.es)
- Iberdrola Energía Internacional, S.A.U., Iberdrola Clientes Internacional, S.A.U. and Iberdrola Renovables Internacional, S.A.U.: [dpoiei@iberdrola.com](mailto:dpoiei@iberdrola.com)
- Group companies in the UK: [dataprotection\\_corporate@scottishpower.com](mailto:dataprotection_corporate@scottishpower.com)
- Group companies in Italy: [dpo@iberdrola.it](mailto:dpo@iberdrola.it)
- Group companies in Portugal: [dpo@iberdrola.pt](mailto:dpo@iberdrola.pt)
- Group companies in Ireland: [dataprotection@iberdrola.ie](mailto:dataprotection@iberdrola.ie)
- Group companies in France: [dpo@iberdrola.fr](mailto:dpo@iberdrola.fr)
- Group companies in Germany: [datenschutz@iberdrola.de](mailto:datenschutz@iberdrola.de)
- Group companies in Brazil: <https://www.neoenergia.com/lgpd-contato-dpo>
- Group companies in Australia: [privacy@iberdrola.com.au](mailto:privacy@iberdrola.com.au)

## 2. What personal data may we collect and process?

Iberdrola may process the following personal data depending on the contract and the legal obligations of the companies within the Iberdrola Group:

- Identification data: first name, surname, ID number/Tax number/Foreign Resident ID Registration Number or other tax or registration identification document, such as RG/CPF in Brazil, passport or similar identity document, postal address, landline/mobile phone number, email address, photograph and signature. In the case of the contact person, also your email address and, in some cases, your mobile phone number, for the purposes of two-factor authentication as detailed in the section on the purposes of processing.
- Personal characteristics data: Marital status, family details, date and place of birth, gender and nationality. In addition, Avangrid, Inc. and its subsidiaries and other companies within the Iberdrola Group located in the US may collect information relating to your, race or ethnicity, and your status as a veteran or person with a disability, in order to comply with certain rules and regulations, for equal employment opportunity reporting and other legal compliance purposes.
- Academic and professional data: Professional activity, membership of professional bodies or associations, profession, job title.
- Economic, financial and insurance data: bank details for transfers and payments; tax and social security certificates; annual financial statements; and business activity.
- Business data: services provided by suppliers and potential suppliers.
- Additional information obtained from public registers and public databases on reputational risk and compliance, which may include, amongst other things: data on activities and business operations, the existence of infringements and sanctions, the data subject's status as a person holding public office, the third party's status as a public company, or other information necessary to ascertain whether suppliers and potential suppliers meet the high ethical standards governing contracting by Iberdrola Group companies.

The data controller reserves the right to require the supplier, at any time and provided there are duly justified grounds of necessity and proportionality, to produce the original documentation and to provide a certified or authenticated copy thereof, in order to verify the truthfulness, accuracy and completeness of the information provided within the framework of the contractual relationship.

### 3. How do we obtain your personal data?

We obtain your personal data directly from you during the registration and enrolment process in the Iberdrola Register of Potential Suppliers and Suppliers through the various channels provided for this purpose and, where applicable, from the information provided during the contracting processes and the course of the contractual relationship established with the Supplier.

In addition, Iberdrola may obtain personal data from third parties, such as public registers and public databases on reputational risk and compliance, such as Refinitiv (<https://www.refinitiv.com/en/products/world-check-kyc-screening/privacy-statement>), Dow Jones (<https://djlogin.dowjones.com/privacy/default.aspx?fcpil=es>) or Informa (<https://www.informa.es/textos-legales#privacidadbd>).

Refusal to provide or failure to supply certain requested data may mean that we are unable to comply with our legal obligations or with the purposes set out in the Notice.

Please update your personal data whenever it changes, and always provide accurate information, as we need to have your up-to-date details.

### 4. For what purposes may your personal data be processed and on what legal basis?

The information you provide will be processed for the following purposes:

1. Participation in the qualification process as a potential supplier to the Iberdrola Group and periodic verification that the Supplier meets these requirements, in accordance with the following legal basis: (i) where the data relates to contact persons, directors, authorised representatives or agents of a legal entity, Iberdrola's legitimate interest in verifying whether such potential supplier or supplier meets the necessary requirements to be registered as an Iberdrola supplier within the context of its Compliance rules and procedures and, if so, to include them in the Register; (ii) where the data relates to a potential supplier or supplier who is a natural person, with regard to the data provided by them, the need to process such data as a precondition to the potential conclusion of a contract, as requested by the supplier themselves when applying for registration in the Register and, consequently, the existence of pre-contractual measures prior to such conclusion; and (iii) regarding the additional information obtained by Iberdrola, the legitimate interest of Iberdrola in verifying whether said Supplier meets the necessary requirements to be registered as an Iberdrola supplier and, if so, to include them in the Register.
2. Management of the participation of Suppliers in procurement processes, in accordance with the following legal basis: (i) if the data relates to contact persons or representatives of a legal entity, Iberdrola's legitimate interest in managing the current and future relationship with said supplier or potential supplier; and (ii) where the data relates to a natural person, the implementation, at the data subject's request, of pre-contractual measures consisting of the request to participate in the aforementioned procurement processes.
3. Internal management of Suppliers, based on Iberdrola's legitimate interest in maintaining a record of Suppliers who have applied to register as Iberdrola suppliers and the outcome of their qualification process, and in properly managing and organising its relationships with suppliers.

4. Preparation of surveys, statistics and internal reports, based on Iberdrola's legitimate interest in improving its relationship with Suppliers and obtaining statistics and preparing reports in this regard.
5. Sending communications relating to sustainability, ethics, compliance, security and cybersecurity, based on Iberdrola's legitimate interest in promoting awareness among its Suppliers in these areas.
6. Maintenance, development and management of the contractual relationship, including the management of collections and payments, the legal basis being: (i) if the data relates to contact persons or representatives of a supplier that is a legal entity, Iberdrola's legitimate interest in managing the relationship established with said Supplier; and (ii) where the data relates to a supplier who is a natural person, the performance of the contract entered into between both parties.
7. Administrative management, the legal basis being Iberdrola's legitimate interest in maintaining proper internal management of the Group.
8. Management of the coordination of business activities and occupational risk prevention for contractors, as well as health and safety, the legal basis being compliance with legal obligations.
9. Submission of tax information and compliance with other legal obligations and requirements and requests from regulatory, governmental and judicial bodies, the legal basis being compliance with legal obligations.
10. Management and processing of administrative/judicial proceedings, based on Iberdrola's legitimate interest in its legal defence and the exercise of rights, legal and regulatory requirements or those of other authorities or government agencies, and proceedings before other public bodies, based on compliance with legal and regulatory obligations in the rest.
11. Management of complaints and enquiries via the supplier's ethics channel, analysis of potential conflicts of interest and analysis of risks relating to solvency, anti-corruption, fraud, cybersecurity, sustainability, geopolitical issues, accidents or related matters, and other compliance activities, the legal basis being the legal obligation in the case of enquiries and complaints concerning actions or omissions under applicable regulations, on the public interest in detecting and preventing acts contrary to applicable regulations and, on the other hand, on Iberdrola's legitimate interest in detecting, preventing and managing actions that may be contrary to its Code of Conduct and in ensuring compliance with the Group's internal compliance regulations. In the case of other compliance activities, processing is based on legitimate interest or the fulfilment of legal obligations by Iberdrola.
12. Physical security and cybersecurity, based on Iberdrola's legitimate interest in safeguarding its physical security and the security of its assets and information systems, and/or compliance with legal obligations.
13. Ensuring the security of its IT networks, based on Iberdrola's legitimate interest. The email address and, in some cases, the mobile phone number of the contact person for the Iberdrola Group may be processed to apply two-factor authentication for access to information systems, consisting of adding a second method of user verification.

14. Invitations to events , based on Iberdrola's legitimate interest in creating a network of contacts for the development and maintenance of public relations and/or *networking* with its stakeholders, as well as for the exchange of views on matters relating to its business project and social responsibility strategy, with the aim of contributing to the development of the communities in which it conducts its business .
15. Conducting internal audits on the basis of Iberdrola's legitimate interest in carrying out audit processes or its legal obligation to monitor compliance with the regulations to which it is subject, internal operating protocols or the corporate governance model, as well as external audits, on the legitimate basis of compliance with legal audit obligations for those companies required to carry them out or Iberdrola's legitimate interest in reviewing its accounts and, in general, in auditing its processes, indicators, etc., in the event that the Iberdrola Group company does not have such a legal obligation .
16. Recording of the history of contracts entered into by Iberdrola with the Supplier and of its participation in Iberdrola Group tenders, for the purpose of considering this as a criterion in future contracts, based on Iberdrola's legitimate interest in maintaining a record of contracts and tenders to facilitate future contracting processes involving the Supplier.

We inform you that no individual decisions will be made based solely on the automated processing of your personal data, including profiling.

Special categories of data will only be processed in accordance with applicable data protection legislation where (i) it is necessary to comply with our legal obligations, as well as in accordance with the requirements of legislation, government bodies or public authorities; or (ii) it is required for the establishment, exercise or defence of legal claims or proceedings.

With regard to the purposes set out in sections I and II above and, specifically, with regard to risk analyses, please be advised that personal data lawfully obtained from the public registers and public databases on reputational risk and compliance mentioned in the section *'How do we obtain your personal data?'* may be used.

Finally, we inform you that where data processing is based on Iberdrola's legitimate interest, Iberdrola has carried out the corresponding balancing test between the legitimate interest and the data subject's rights, in order to ensure that the necessary safeguards for the adequate protection of your rights have been taken into account. If you wish to know the conclusions of any of the legitimate interest balancing tests, you may request them from the Data Protection Officer at the address mentioned in the section *"Who is responsible for processing your personal data?"*.

## **5. How long do we keep your data?**

Your personal data associated with the processing purposes set out above will be processed by Iberdrola in accordance with the following timeframes:

Purpose(s)	Processing periods
1, 2, 3 and 16	<p>If the initial Iberdrola supplier qualification process is not successfully completed, personal data will be processed until the end of that process.</p> <p>If you pass this process, the data will be retained for as long as the Supplier remains listed as such in the Register of Suppliers and Potential Suppliers and (i) does not express a wish not to be considered for future tenders that Iberdrola may issue, or (ii) exercises their right to object to the processing.</p>
4	Until the survey, statistics or reports have been compiled and, in any event, until the data subject exercises their right to object to the processing.
5 and 14	For as long as the Supplier remains listed in the Register of Suppliers and Potential Suppliers and, in any event, until the data subject exercises their right to object to the processing.
6, 7 and 13	Until the end of the contractual relationship, or until the data subject exercises their right to object to the processing.
8 and 9	Until the applicable legal obligations have been fulfilled.
10	Until the conclusion of administrative or judicial proceedings and the handling of the exercise of rights, as well as compliance with legal, regulatory or other requirements from authorities or government agencies and proceedings before other public bodies.
11	<p>In the case of enquiries, for a period of two (2) years from receipt. In the case of complaints, for a maximum period of three (3) months from receipt, unless such a complaint leads to the opening of an investigation file, in which case the data will be processed until the file is closed.</p> <p>For all other compliance activities, the data will be processed for two (2) years from the date of such activity.</p>
12	Until the end of the contractual relationship and/or the fulfilment of applicable legal obligations.
15	For the duration of the audit and subsequent management and/or until the applicable legal obligations have been fulfilled.

Notwithstanding the foregoing, where the processing of your data is based on Iberdrola's legitimate interest or public interest and you exercise your right to object to such processing, your personal data will no longer be processed unless compelling legitimate grounds for the processing are demonstrated which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. Furthermore, in the event

the processing of your data is based on your consent, the processing of your personal data will cease when you request its withdrawal, without this affecting the lawfulness of the processing based on consent prior to its withdrawal.

Once the above time limits have expired, personal data may be retained, duly blocked where applicable, for the period permitted or required by applicable legislation and until the expiry of the limitation periods for (i) any obligations to which Iberdrola may be subject (including any additional periods that may be required by applicable laws or regulations, judicial, administrative or arbitration proceedings, legal, regulatory or audit requirements, etc.) and (ii) any liabilities arising from the contractual relationship as well as from the processing of such data itself.

Once the aforementioned period has elapsed, the personal data, will be permanently deleted in such a way as to protect the privacy of said information and in accordance with our internal procedures and applicable legislation.

## **6. With whom do we share your data?**

Personal data may be disclosed to third parties (companies, government bodies, public authorities, etc.) where (i) it is necessary for the implementation of pre-contractual measures or the management, development and performance of the contractual relationship, (ii) by virtue of Iberdrola's legitimate interest, (iii) in compliance with legal or regulatory obligations applicable to Iberdrola, (iv) to respond to judicial or administrative requests from a competent authority, or (v) the exercise of legal actions and the defence of Iberdrola's rights.

In particular, and without limitation, your data may be disclosed to insurance and reinsurance companies, insurance brokers, external auditors, and law firms

We may also disclose your data to third parties involved in corporate transactions and, specifically, in the due diligence processes related thereto, so that such third parties may access and review the necessary information within the framework of such transactions, the legal basis for such disclosure being the legitimate interest of Iberdrola and the third parties in the successful completion of those transactions.

The personal data of the supplier and/or potential suppliers – or of their representatives or contact persons, in the event that the supplier is a legal entity – may be disclosed to companies within the Iberdrola Group that have an interest in contracting them, on the basis of the legitimate interest of such companies in the proper management and organisation of their relations with creditors . These Iberdrola Group companies are listed on the corporate website

[https://www.iberdrola.com/documents/20125/42388/IB\\_Informe\\_Financiero\\_Anuual.pdf](https://www.iberdrola.com/documents/20125/42388/IB_Informe_Financiero_Anuual.pdf)

Furthermore, your data will be accessible to third parties who, as data processors, provide external services to Iberdrola, such as, but not limited to, billing, and tax payment services; accounts payable management; consultancy and *report* preparation services; IT and banking; services surveillance; security and cybersecurity services. We have entered into the contracts required by applicable data protection legislation with all of them, which set out their obligations as data processors.

In this context, we inform you that the aforementioned communications and processing activities may involve the transfer of your personal data from Iberdrola Group companies located in the European Economic Area ("EEA") or in the United Kingdom to Iberdrola Group companies or third-party companies located outside these territories. In such cases, Iberdrola guarantees that any international data transfer will be made to (i) countries for

which the European Commission and/or the United Kingdom has declared an adequate level of protection; (ii) in the absence of such a decision, by implementing one of the appropriate safeguards set out in Article 46 of the GDPR or applicable data protection legislation, such as the Iberdrola Group's Binding Corporate Rules ("BCRs") or by signing the Standard Contractual Clauses in force with the data recipient, and, in all cases, subject to an analysis of the regulations of the country of destination, ensuring that the protection of your personal data is equivalent to that required by the applicable regulations ; and (iii) where it is not possible to rely on any of the above scenarios and the transfer is of a one-off nature, in accordance with one of the exceptions set out in Article 49 of the GDPR or the applicable data protection legislation.

For clarification, the existence of the BCRs means that all entities within our Group that have signed them must comply with the same data protection standards when processing personal data transferred from the EEA or the United Kingdom. It also means that, where applicable, your rights remain the same, regardless of where Iberdrola processes your data. You can view and download a copy of the Iberdrola Group's BCRs at <https://www.iberdrola.com/politica-privacidad/normas-corporativas-vinculantes> .

## 7. What are your rights?

Where applicable data protection legislation so provides, or where the processing falls within the scope of the BCRs, you may exercise your rights of access, erasure (right to be forgotten), rectification, objection, restriction and portability at any time and free of charge, as well as the right not to be subject to automated individual decision-making, including profiling .

You may submit your requests to exercise your rights, where applicable, via the following channels

- For Iberdrola Group companies located in the European Union: Administration Department, Plaza Euskadi 5, 48009 Bilbao or to the following email addresses: [Gestionterceros@iberdrola.es](mailto:Gestionterceros@iberdrola.es), and
- For companies within the ScottishPower Group: [Administration-Vendors@scottishpower.com](mailto:Administration-Vendors@scottishpower.com) or Data Protection Officer, Scottish Power UK Plc, 320 St Vincent Street, Glasgow, G2 5AD.
- For companies within the Avangrid Group: [VendorMaintenance\\_AdminUSA@avangrid.com](mailto:VendorMaintenance_AdminUSA@avangrid.com) or AVANGRID General Administration, 162 Canco Road, Portland, Maine 04103
- For Iberdrola Group companies based in Australia: [\\_privacy@iberdrola.com.au](mailto:_privacy@iberdrola.com.au) or Privacy Officer, Level 11 Governor Phillip Tower, 1 Farrer Place, Sydney, NSW 2000, Australia.
- For Iberdrola Group companies based in Brazil: You may submit your requests to exercise your rights, where applicable, via the following channel: <https://www.neoenergia.com/lgpd-processos-transacionais> .

Where applicable, you may lodge a complaint with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) or the equivalent competent supervisory authority in your country.

## ScottishPower (UK only)

### Right to Complain

Under the Data Use and Access Act 2025, you have the right to raise a concern with us if you believe your personal data has been handled improperly or in a way that does not comply with data protection legislation.

To understand how we will manage and respond to your data protection complaint, please refer to our Data Protection Complaints Procedure, available here: [SP Complaints Procedure](#)

If you wish to submit a complaint, you can do so using our dedicated Data Protection Complaint Form, available [here](#).

If you are not satisfied with the response, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) by contacting:  
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Or Tel: 0303 123 1113

**Translation into other languages:** Versions of the privacy notice in languages other than Spanish are provided for information purposes only. In the event of any discrepancies between the content of these versions and that of the original Spanish version, the latter shall always prevail.