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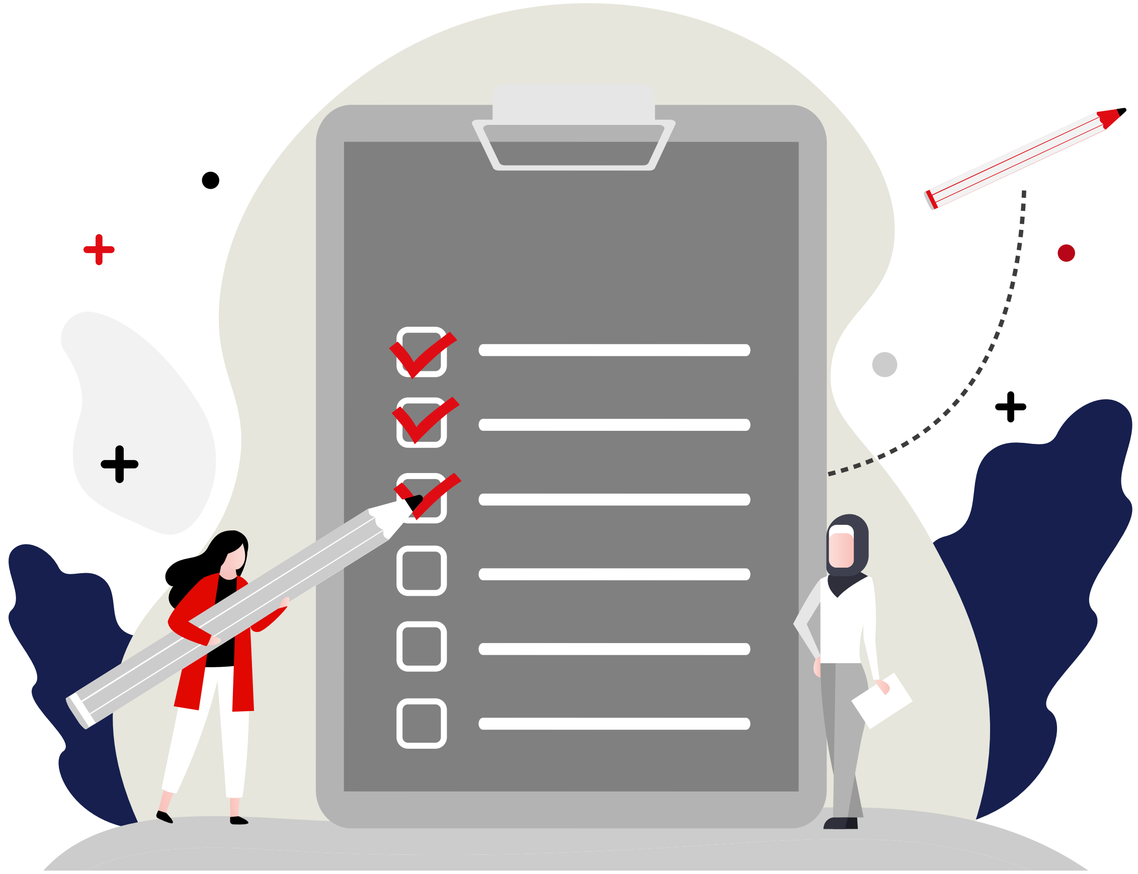
&'s Group Data Protection Policy Summary

This **summary document** highlights the e& Group policy scope, main standards and key principles. It features its alignment with international standards and its comprehensive, global approach.



Content

1 What is the Group Data Protection Policy?

The e& Group Data Protection Policy sets the standards for handling personal data across e&. It ensures compliance with data protection laws worldwide and helps maintain the trust of customers, employees, partners, and stakeholders. This policy outlines how we collect, use, store, and share personal data across all e& entities, in all jurisdictions e& operates, reflecting our commitment to safeguarding data and protecting e&'s reputation as a trusted technology provider.

2 Who does the policy apply to?

This policy applies globally to all e& entities, employees, partners, and service providers who access or process personal data on behalf of e&. Every person involved with personal data at e& is responsible for its protection.

3 Global Centralized Approach:

The policy adopts a unified global framework, setting consistent privacy standards across all group entities worldwide. This centralized approach ensures that all branches and divisions uphold the same high standards of privacy protection, demonstrating the organization's strong commitment to privacy.

4 Compliance with International Standards:

This policy applies globally to all e& entities, employees, partners, and service providers who access or process personal data on behalf of e&. Every person involved with personal data at e& is responsible for its protection.

5 Data Protection Principles:

The policy emphasizes core data protection principles in alignment with global regulations, such as lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality. These principles are ingrained in every process, ensuring data is handled securely and ethically.

6 Rights of Individuals:

It upholds the rights of individuals by providing clear guidelines on how they can access, rectify, delete, or transfer their data. The policy ensures easy accessibility for individuals wishing to exercise their rights, thereby aligning with consumer-centric international standards.

7 Data Security and Breach Response:

Robust measures are in place to safeguard data against unauthorized access, alteration, or destruction. The policy details proactive security practices and a robust breach response plan with adequate internal processes, ensuring prevention of data breaches and rapid action and mitigation in case of data breach occurrence.

8 Transparency and Accountability:

e& commits to maintaining transparency in its data processing activities and holds itself accountable. Regular audits, impact assessments, and compliance checks are conducted to enforce this accountability.

9 Training and Awareness:

Regular privacy training and awareness programs are mandatory for all employees. This initiative ensures that all staff are knowledgeable about the Group Data Protection Programme, privacy norms and the importance of protecting personal data, reinforcing the organization's dedication to privacy at every level.

10 Third-Party Management:

The Supplier shall act in accordance with all applicable international standards and laws on fraud and money laundering and (where appropriate) maintain an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.

11 Group DP Policy - Ongoing monitoring and auditing:

The Group Data Protection team reports monthly, quarterly, and yearly on performance metrics related to data protection compliance and provides these reports to relevant functions such as Internal Audit and senior leadership.

In addition to that, the Group DPO conducts an annual comprehensive monitoring and testing exercise to evaluate data protection compliance levels. Required improvements and remediation activities are reported to respective Business Units/OpCos with remediation completion timeframes and tracked for completion within the monthly Group DPO reporting cycle.