

# Personal Data Privacy Policy

October 18, 2023

The Board of Directors of Avangrid, Inc. (“Avangrid”) oversees the management of Avangrid and its business with a view to enhance the long-term value of Avangrid. Avangrid is a member of the group of companies controlled by Iberdrola, S.A. (the “Iberdrola Group”). The Board of Directors of Avangrid (the “Board of Directors”) has adopted this Personal Data Privacy Policy (this “Policy”) to assist in exercising its responsibilities to Avangrid and its shareholders. This Policy is subject to periodic review and modification by the Board of Directors from time to time. This Policy and Avangrid’s certificate of incorporation, by-laws, corporate governance guidelines and other policies pertaining to corporate governance and regulatory compliance, risk, sustainable development, and social responsibility (collectively, the “Governance and Sustainability System”) form the framework of governance of Avangrid and its subsidiaries (collectively, the “Avangrid Group”). Avangrid’s Governance and Sustainability System is inspired by and based on a commitment to ethical principles, transparency and leadership in the application of best practices in good governance and is designed to be a working structure for principled actions, effective decision-making and appropriate monitoring of both compliance and performance.

## 1. Purpose

In the context of the Avangrid Group’s business activities, the Avangrid Group processes personally identifiable information (“PII”) from different groups of stakeholders such as customers, employees and suppliers. Avangrid recognizes the importance of proper use and handling of the PII acquired, used, stored, destroyed or disclosed in the course of the Avangrid Group’s business activities. This Policy sets forth the general principles that will guide the processing of PII by the Avangrid Group and the basic framework for the distribution of privacy compliance related responsibilities within the different Avangrid Group divisions. This Policy does not, and is not intended to, describe the specific privacy practices of the Avangrid Group, but sets forth the general principles that guide the Avangrid Group’s approach towards privacy compliance. This Policy is not, and should not be construed as, a privacy notice, statement or disclosure. This Policy contributes to the achievement of goal eight (Decent Work and Economic Growth) and goal sixteen (Peace, Justice and Strong Institutions) of the Sustainable Development Goals (SDGs) adopted by the member states of the United Nations.

## 2. Principles

Avangrid Group companies shall comply with all applicable privacy laws and regulations in relation to the processing of PII. In addition, the Avangrid Group shall consider the following general principles when processing PII:

- a) **Management.** Define, document, communicate and assign accountability for privacy practices.
- b) **Notice and Purpose Specification.** When required by applicable law or otherwise considered appropriate by the Avangrid Group, provide notice about privacy practices, including identifying the purposes for which PII is collected, used, retained and disclosed.
- c) **Choice and Consent.** When required by applicable law or otherwise considered appropriate by the Avangrid Group, describe the choices available to stakeholders and obtain implicit or explicit consent with respect to the collection, use and disclosure of PII.
- d) **Collection Limitation.** When required by applicable law or otherwise considered appropriate by the Avangrid Group, limit the collection of PII to information needed for legitimate business needs and purposes and any other purposes that may be specified in a privacy notice. If stakeholders have been provided with a privacy notice identifying the purposes for which specific PII is collected, the Avangrid Group shall only collect the specified PII for purposes that are consistent with the privacy notice.
- e) **Transparency.** The Avangrid Group shall be transparent about its practices with respect to the processing of PII.
- f) **Use, Retention and Disposal.** When required by applicable law or otherwise considered appropriate by the Avangrid Group, limit the use of PII to legitimate business needs and purposes and any other purposes identified in any applicable privacy notice. When appropriate, the Avangrid Group shall retain PII for only as long as necessary to

fulfil legitimate business needs or stated purposes or as required by law or regulations, and thereafter appropriately dispose of such information.

- g) Access. When required by applicable law or otherwise indicated in any applicable privacy notice, provide stakeholders with appropriate access to their PII for review, verification and correction.
- h) Portability. When required by applicable law or otherwise indicated in any applicable privacy notice, provide stakeholders with appropriate portability of their PII.
- i) User Limitation and Disclosure to Third Parties. Avangrid Group employees' right to access PII shall appropriately account for whether the employee "needs to know" and/or "needs to have" access to the PII to fulfil job responsibilities.

The Avangrid Group may disclose PII to third parties, including, without limitation, to (i) affiliates, (ii) contractors, service providers, and other third parties used to support the Avangrid Group's business, (iii) any successor or assignee, or (iv) as required by applicable law or mandate. As appropriate, privacy notices provided by the Avangrid Group shall describe the type of third parties that could be given access to specific PII and the circumstances thereof. When contracting with third parties that may access PII, the Avangrid Group shall take appropriate measures to assess, monitor and control the risks associated with the processing of PII by such third party.

- j) Security for Privacy. The Avangrid Group shall have in place appropriate technical and organizational security measures that aim to protect PII against unauthorized access or acquisition. In the event of a data security breach, the Avangrid Group shall take appropriate steps to comply with applicable breach notification and reporting requirements.
- k) Data Quality. Take reasonable steps to maintain accurate and relevant and, where necessary, up-to-date PII.
- l) Monitoring and Enforcement. Regularly monitor compliance with privacy procedures and practices.

The general principles set forth in this Policy shall also be considered when developing and implementing internal procedures and rules and when designing and implementing systems containing PII.

### 3. Organization

Avangrid's Corporate Security Division shall be responsible for (i) supervising the implementation of this Policy by the Avangrid Group, (ii) developing and maintaining, with the support of Avangrid's Legal Services Division, appropriate privacy procedures, rules and practices, and (iii) monitoring compliance by the Avangrid Group of this Policy and any applicable privacy procedures, rules and practices. Avangrid's Legal Services Division shall be responsible for monitoring material developments concerning privacy laws and regulations, as well as informing Avangrid's Corporate Security Division of such material developments. Avangrid's technology divisions shall be responsible for implementing appropriate technology controls and developments.

As appropriate, the business and corporate function divisions of the Avangrid Group shall identify data owners and shall process PII in accordance with the principles set forth in this Policy and any applicable privacy procedures, rules and practices. Members of Avangrid's Corporate Security Division participate in the Iberdrola Group cybersecurity committees, which assist with coordination across the Iberdrola Group and the implementation of best practices in personal data protection and risk management.

This basic framework for the distribution of privacy compliance related responsibilities within the different Avangrid Group divisions may be further developed or supplemented by other internal frameworks, procedures, or rules.