

PRIVACY NOTICE FOR SUPPLIERS

Last update: 12-17-2019

We want to take this opportunity to inform you about the processing of the personal data that you provide to Avangrid, Inc. and its affiliates, as well as the personal data that we may collect in the future in the context of any third party vendor contractual or legal relationship that we may establish with you.

Avangrid, Inc. and the companies of the group headed by our controlling shareholder, Iberdrola, S.A. (hereinafter, any of them, "Iberdrola") commit to protect your privacy and to comply with applicable personal data protection laws and regulations. Your personal data will be processed in a lawful, fair and transparent manner; according to explicit and legitimate purposes; only if it is adequate, relevant and limited to what is necessary in relation to such purposes. In addition, we will keep your personal data accurate and updated; maintaining them in a way that allows for its identification only for the time needed for the fulfillment of the purposes that justify their processing.

Iberdrola has implemented technical and organizational measures to protect your personal data from accidental loss and from unauthorized or unlawful modification, access, use or disclosure. We have established procedures to respond in the event of a security incident that affects your personal data.

Iberdrola, S.A. has developed a tool to manage its relations with suppliers interested in participating in tenders for the awarding of contracts with Iberdrola, S.A. or companies of its corporate group ("Iberdrola Group"). This tool (hereinafter, indistinctly, the "Portal", the "Register of Potential Suppliers and Suppliers" or the "Registry") is managed by Iberdrola, S.A. and the information that it contains at any time as a result of interactions with third parties (interested suppliers, homologated suppliers and contracted suppliers) is accessible to all companies of the Iberdrola Group, some of which are established outside of the European Economic Area. The list of such companies can be accessed at https://www.iberdrola.com/wcorp/gc/prod/en_US/corporativos/docs/IB_Annual_Financial_Information.pdf

Therefore, for the purposes of personal data protection laws and regulations, we inform you that any information about suppliers and potential suppliers that we obtain as a result of a request to register in the Portal or any preliminary contact or initiative with Iberdrola, S.A. or any of the companies of the Iberdrola Group for the purposes of qualifying as a supplier, entails the inclusion of such information in the Portal and its access and awareness by any of the referred companies that belong to the Iberdrola Group.

Through this privacy notice we inform you about the processing of your personal data (a) during your contractual relationship with Iberdrola, and (b) after the conclusion of such relationship for the purposes of: (i) complying with the legal obligations that Iberdrola may be subject to and to attend to eventual responsibilities related to the processing of your personal data and (ii) for your continued registration as a supplier in the Iberdrola Registry of Potential Suppliers and Suppliers to maintain historical information of the relations of Iberdrola with its suppliers and to consider you for future contracting processes of Iberdrola.

If we update this privacy notice, we will notify you through the Portal in a timely manner.

In the event that, as a result of the contractual relationship with Iberdrola you provide us with third party data, for example, name, position and contact data of your employees, directors, officers, shareholders or representatives, you must, before providing us with their personal data, inform such third party about the processing of their personal data in accordance with the terms of this privacy notice.

Who is responsible for processing your personal data?

The data controller of your personal data is (i) the company of the Iberdrola Group with whom you have a contractual relationship and whose identification appears in the contractual documentation and (ii) Iberdrola, S.A. with registered office at Plaza Euskadi 5, Bilbao, Spain as holder of the Registry of Potential Suppliers and Suppliers of the Iberdrola Group and as the provider of purchasing services to the other companies of the Iberdrola Group.

The companies of the Iberdrola Group have designated Data Protection Delegates. You may contact them at the following email addresses, when applicable:

- Iberdrola, S.A.: dpo@iberdrola.com
- Rest of the Iberdrola Group companies in Spain: dpo@iberdrola.es
- Companies of the Iberdrola Group in UK: dataprotection_corporate@scottishpower.com
- Companies of the Iberdrola Group in Italy: dpo@iberdrola.it
- Companies of the Iberdrola Group in Portugal: dpo@iberdrola.pt

What personal data do we collect and process from you?

The personal data that we may collect from you belongs to the following categories:

- Data of an identifying nature: name, surname, national identity document, tax identification number, foreigners' identity number, passport or other identity document, postal address, landline/mobile telephone, email, image and signature. In case of the contact person, also their professional email, for the purposes of the double authentication factor detailed in the section relating to the purposes of the processing.
- Data related to personal characteristics: civil status, family data, date and place of birth, age, gender, nationality, languages. In addition, where legally permissible, Avangrid, Inc. and its subsidiaries and other entities of the Iberdrola Group established in the USA may collect information regarding race, ethnicity, veteran and disability status for compliance with small business concerns regulations, equal employment opportunity reporting and other legal and compliance purposes.
- Academic and professional data: professional activity, training, qualifications, professional experience, memberships in professional associations, occupation and job title.
- Economic, financial and insurance data: Bank data for transfers and payments.
- Business activities: services provided.

We may request that you provide original documentation and deliver a copy of it, as evidence to support the information you have submitted.

How do we collect your personal data?

You provide us with your personal data through the information you provide to us when registering in the Registry of Potential Suppliers and Suppliers of Iberdrola and, where applicable, through the contracting process and during the course of the contractual relationship.

If you do not provide us with the requested personal data, we may not be able to register you as a supplier, comply with the contractual relationship and with our legal obligations or manage our activities.

We ask that you update your personal data as it changes and to always provide truthful information, as we must have your current information.

For what purposes do we process your personal data?

Iberdrola will only process your personal data in accordance with the following purposes:

- a) Periodically verify that the supplier complies with the requirements that were required during the supplier qualification process undertaken when you registered as an Iberdrola supplier.
- b) Manage your participation in purchasing processes.
- c) Maintenance, development and control, in all its aspects, of the contractual relationship.
- d) Internal management of suppliers.
- e) Preparation of surveys, statistics and internal reports.
- f) Sending communications related to sustainability, ethics and compliance.
- g) Collection and payment management.
- h) Administrative management.
- i) Management of the coordination of business activities and prevention of occupational hazards of contractors and health and safety.
- j) Submission of tax information.
- k) In connection with administrative and judicial proceedings and actions before public authorities.
- l) Management of complaints and inquiries in the supplier ethical channel, analysis of possible conflicts of interest and analysis of solvency, anti-corruption, fraud or related risks.
- m) Control of access to facilities and other security activities.
- n) In case of the professional email of the contact person with the Iberdrola Group, to apply a dual authentication factor in the access to the information systems consisting of adding a second method of user verification.
- o) Invitation to information sessions and supplier awards.
- p) To keep the track record of previous agreements entered into between Iberdrola and the supplier for assessment purposes in relation to future contracts.
- q) To comply with applicable legal or regulatory requirements, legal process or orders from regulatory agencies and responding to government, judicial or regulatory requests.

In relation to the purpose indicated in section l), specifically in relation to the risk analysis, we inform you that in the performance of such analysis we may use personal data of individuals (representatives, directors, officers or shareholders) linked to the supplier of the company of the Iberdrola Group legitimately obtained from public records. You agree to inform such persons in accordance with this privacy notice and to indemnify the Iberdrola Group company

with whom you have a contractual relationship from any damages that may result from failure to comply with this obligation.

What is the legal basis for the data processing?

The legal basis for the processing of your personal data, for the purposes indicated in sections a), b), c), and g), if the personal data belongs to the contact persons or representatives of a supplier that is a corporate entity, it is the legitimate interest of Iberdrola in managing existing and future relations with such supplier. If the personal data belongs to a supplier that is an individual, the legal basis for the processing is the performance of the contractual relationship.

The legal basis for the processing of personal data for the purposes indicated in sections i), j) and q) is to comply with the legal obligations.

The legal basis for the processing of personal data for the purposes indicated in section l) is the public interest and the legitimate interest of Iberdrola in the creation and maintenance of information systems through which the company can be made aware of the commission, within it or by third parties who contract with the company, of acts that may be contrary to applicable law or internal policies, procedures and rules of Iberdrola, respectively.

The legal basis for the processing of personal data for the purposes indicated in section m) is the public interest in preserving the security of people and property, as well as of the facilities of Iberdrola and the legitimate interest in controlling access to such facilities to guaranty their security and the security of people and property.

The legal basis for the processing of personal data for the purposes indicated in sections d), e), f), h), k), n), o) and p) is the legitimate interest of Iberdrola in, respectively, (i) adequately administering and organizing its relations with suppliers, (ii) improving such relations and obtaining related statistics, (iii) promote awareness regarding sustainability, ethics and compliance, (iv) maintain an adequate internal management of the Iberdrola Group, (v) exercise its rights to effective judicial protection and defense, (vi) assure the security of its computer networks, ethical compliance, prevention of fraud and money laundering and (vii) invite you to events, acts and contests organized by Iberdrola and (viii) to keep a track record of prior contracts for the purposes of facilitating the formalization of future agreements with the supplier.

How long do we store your personal data?

Personal data processed for the purposes specified in b), c), d), g), h), i), j), k), l), n) and q) will be kept for the period of time necessary to comply with the purpose for which they were collected and in any case until the end of the contractual relationship. Personal data may be kept after that, duly blocked, until after the expiration of the statute of limitations of any potential obligations that Iberdrola may be subject to and of the eventual responsibilities related to the processing of your personal data.

Personal data processed for the purposes envisaged in paragraph a) shall be kept for as long as the supplier maintains the status of authorized supplier and provided that it has not notified Iberdrola its decision not to participate in future tenders organized by Iberdrola.

Personal data processed for the purposes set for in letter e) will be kept until the elaboration of the survey, statistic or report.

Personal data processed for the purposes set forth in letter f) and o) will be kept until the time you exercise your right to oppose to the processing.

Personal data processed for the purposes of complying with the purposes set forth in letter m) will be kept in accordance with our security procedures and practices.

Personal data collected for the purposes intended in paragraph p), shall be kept by Iberdrola beyond the termination or expiration of the agreement and for as long as the supplier has an interest in being engaged by Iberdrola provided that, accordingly, it has not objected to such use of the personal data.

Disposal of personal data will be made in a manner intended to protect the privacy of such information and in accordance with our internal procedures and applicable law.

Who will receive your personal data?

Your personal data may be communicated to third parties and public authorities (i) when necessary for the management, performance or enforcement of the contractual relationship, including compliance with our obligations or the exercise our rights, (ii) if we are required to do so by law or regulation, or (iii) to comply with court orders, legal process or government, judicial or regulatory requests.

We may share your data in connection with corporate transactions, including during the course of due diligence processes related to such transactions.

Your personal data will be accessible by affiliates and third parties that provide services related to the contractual relationship such as information services on creditworthiness or credit risk, billing and payment services, accounts payable management, consulting services and preparation of reports and reporting, computer services, training services, surveillance and security services. We sign contracts with third party service providers which regulate their obligations as data processors.

Your personal data may be communicated to Iberdrola Group companies that may be interested in contracting with you. Such companies of the Iberdrola Group are those listed on the corporate website:

https://www.iberdrola.com/wcorp/gc/prod/en_US/corporativos/docs/IB_Annual_Financial_Information.pdf

In this case, in the event that the processing of your personal data is subject to the General Data Protection Regulation ("GDPR") and the communication of your personal data is to companies of the Iberdrola Group located outside of the European Union or in countries that do not have a legal framework for the protection of personal data similar to the one established in the European Union, Iberdrola will ensure that such communication is done in accordance with GDPR, that is, through any of the mechanisms set forth in the European regulation for these cases. Therefore, Iberdrola will undertake to comply with adequate measures so that your personal data is protected in the destination country or organization in identical or similar terms as those foreseen in the European and Spanish regulations.

In any case, this communication of personal data will take place in accordance with the applicable legal basis and respecting the principles of fairness, loyalty, transparency and purpose limitation, among others. You may, at any time, contact Iberdrola to know the specific

guaranties that have been implemented for the adequate and appropriate protection of your personal data, as well as the fact that they have been implemented.

What are your rights?

You have the right of access to your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its erasure when data is no longer necessary for the purposes for which it was collected, in addition to exercising the right to object and restrict the processing and data portability. If the consent of the data subject has been obtained, the data subject may withdraw the consent at any time. You can exercise these rights by writing to the following addresses:

- For Iberdrola Group companies located in the European Union: - Dirección de Administración, Plaza Euskadi 5, 48009 Bilbao. By e-mail: Gestionterceros@iberdrola.es
- To Iberdrola México Group companies: mx.protecciondatos@iberdrola.com or Boulevard Manuel Ávila Camacho No. 24, piso 19, Col. Lomas de Chapultepec, C.P. 11000, Ciudad de México.
- To Avangrid Group companies: VendorMaintenance_AdminUSA@avangrid.com or AVANGRID General Administration, 162 Canco Road, Portland, Maine 04103

You may file a complaint with the Spanish Data Protection Agency or equivalent supervisory authority.