**PERSONAL DATA CONTRACTUAL CLAUSE**

1. General

Each party to the contract acknowledges that it may be required to process certain personal data relating to the staff, employees and representatives of the other party (the “**Data Subjects**”) under or in connection with this agreement.

[mention the name of the E\*\* entity signing the contract] may need to process certain personal data related to [mention the name of the E\*\*’s counterparty]'s Data Subjects in the manner and for the purposes described in the Privacy Policy of the Global Energy Management business unit and its related companies (the “**Privacy Policy**”) *[insert hyperlink to the new privacy policy which will be available on the future G\*\* division website to be launched Monday \*\*\*\*\*\*\*\*]*

2. Undertakings

Each party undertakes to process the personal data of the Data Subjects in compliance with applicable data protection legislation, including Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“**GDPR**”) and the national data protection laws implementing the GDPR, each as applicable, and as amended, restated or replaced from time to time (the “**Applicable Data Protection Laws**”).

Each party undertakes to implement the appropriate technical and security measures to comply with the Applicable Data Protection Laws.

3. Controllership

Each party, acting in a capacity as data controller, shall proceed with the processing of the personal data of the Data Subjects of the other party in compliance with the Applicable Data Protection Laws.

The parties shall act as two independent data controllers for the processing of the personal data of the Data Subjects under or in connection with this agreement. The parties acknowledge that they shall not act as joint controllers pursuant to art. 26 of the GDPR.

4. Data subjects

Each party shall use its best effort to inform its staff, employees, representatives of the fact that the other party may process personal data concerning them in accordance with the above article. In particular, [insert the name of E\*\*\*’s counterparty] shall use its best efforts to inform his/her Data Subjects about the Privacy Policy.