# API gateway - privacy statement

For TenneT's general privacy statement, we direct you to the Privacy and Data Protection (tennet.eu) on the TenneT website. The privacy statement below is specifically for usage of the API gateway functionality as offered by TenneT TSO B.V. Do you have questions about this privacy statement? We will be happy to answer them. Please contact our data protection officer (see contact details below).

# 1. Contact details TenneT

You can directly ask your privacy related questions to our privacy team by sending an e-mail to privacy(at)tennet.eu. You can also send a letter, addressed to:

TenneT TSO B.V., t.a.v. Functionaris Gegevensbescherming, afdeling ARC

Postbus 718 6800 AS Arnhem

# 2. Processing your personal data

TenneT processes as little personal data as possible within the context of our API gateway functionalities. When logging into our developer portal using your MyTenneT or for example Google account, only your e-mail address is collected by TenneT. TenneT needs your e-mail address to be able to assign you API keys and correct rights, send you essential information such as platform news, updates and downtime, and additionally to inform you when potential account abuse is identified.

Besides your e-mail address, we process a minimum amount of personal data in the form of cookies.

## 2.1. Cookies

Cookies are small text files that are stored in your browser. In case of visiting our API developer portal, two necessary functional cookies are placed in your browser to keep track of your session, and to prevent potential browser-based hacking attempts:

Cookie name	Controller	Purpose	Storage duration
sessionid	TenneT TSO B.V.	Necessary cookie to maintain your session throughout your visit. On TenneT side, the cookie ID is linked to you active session information.	14 days
csrftoken	TenneT TSO B.V.	Necessary cookie for security reasons (see https://owasp.org/www-community/attacks/csrf)	1 year

You can delete cookies yourself by making use of the specific functionality for this in the web browser you're using. To do this, please consult the support manual of your web browser.

#### 3. Origin of the personal data processed

We receive your personal data directly from you, by means of the information you share via connected identity providers such as MyTenneT or Google.

# 4. Legal basis for the processing of your personal data

We process your personal data on the basis of our "legitimate interest" in accordance with article 6 paragraph 1 sentence 1 letter f) GDPR. In this case the legitimate interests are;

- To be able to inform you about urgent matters regarding usage of the API gateway;
- To be able to contact you in case of anomalous behavior from (one of) your API keys;
- To be able to determine which functionalities and API's you may access;

## 5. Data processing in third countries

TenneT strives to only process personal data in the European Economic Area. When TenneT transfers personal data to a third country outside the European Economic Area, this privacy statement will be updated accordingly. It is therefor advisable to periodically check this privacy statement for updates.

# 6. Access to personal data

Employees of our company have access to your personal data to the extent necessary to fulfill the above-mentioned purposes.

We use service providers who support us in the processing of personal data within the scope of our business purpose and our communication. These are in particular service providers for our IT and network operations, mail processing, file/data destruction, archiving as well as agencies/service providers for (corporate) communication. These service providers are subject to strict contractual agreements such as non-disclosure agreements, data protection declarations and contracts for order processing.

## 7. Rights of data subjects

The General Data Protection Regulation (GDPR) gives you a number of privacy rights. To exercise your rights as a data subject, you may contact the Data Protection Officer as described in the contacts section. In order to exercise your rights as a data subject, we may ask you to identify yourself before answering your question. As a data subject within the meaning of the GDPR, you have the following rights;

- Right of access (article 15) You have the right to request a copy of your personal data or to have access to your personal data.
- Right of rectification (article 16) if it appears that your data is incorrect or incomplete, you can request to change or supplement your data.
- Right to data erasure (right to be forgotten Article 17) Under certain legal conditions, you have the right to have your data deleted.
- Right to restrict the processing (Article 18) under certain conditions, you have the right to limit the processing of your data.
- · Right to data portability (article 20) you have the right to obtain and re-use your personal data for your own purposes for different services.
- · Right of objection (Article 21) under certain conditions, you have the right to object against the processing of your personal data.
- Right to appeal to a supervisory authority. (Art. 77 AVG). In the Netherlands this can be done at the Personal Data Authority, Bezuidenhoutseweg 30, 2594 AV DEN HAAG.
- Right to revoke your consent: You can withdraw your consent to the processing of your personal data at any time and request that the processed personal data be deleted. Although you withdraw your consent, the processing of your personal data remains lawful up to the time of withdrawal. Your personal data can only be deleted if there is no other legal basis for the processing of your personal data. If you wish to withdraw your consent, you may submit this request to the Data Protection Officer.

#### 8. Responsible disclosure

Within TenneT we take safety and (ICT) security very seriously. We pay close attention to the security of our ICT systems, such as our website. Nevertheless, it may happen that there are unexpected vulnerabilities in one or our systems. Should you find such a vulnerability, we would appreciate it if you could point this out to us so that we can take adequate measures. For this you can make use of the 'responsible disclosure formulier', as available on tennet.eu/responsible-disclosure.

## 9. Complaints

If you are not satisfied with TenneT's handling of your question or complaint, you can file a complaint with the Dutch Personal Data Authority at Autoriteit Persoonsgegevens.