

## PROCESSING OF PERSONAL DATA RELATED TO DUE DILIGENCE PROCESS

### Privacy Information Notice given to data subject for the processing of personal data

This privacy information notice is provided by Enilive Group Austria: Enilive Austria GmbH, Enilive Marketing Austria GmbH, Enimoov Austria GmbH; acting as Data Controller (hereinafter the "**Company**" or the "**Data Controller**"). In particular, the Data Controller is to be considered the company that performs the processing as specified below.

Under Articles 13 and 14 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "**GDPR**"), the Company provides below the information on the processing of your personal data (hereinafter "**Personal Data**" or "**Data**") as part of the anti-corruption due diligence process and related compliance requirements (hereinafter "**Due Diligence**"), as described within the Anti-Corruption Management System Guideline published on the website <https://www.eni.com/de-AT/operations.html> (hereinafter "**MSG Anti-Corruption**").

The Due Diligence process is one of the key elements of Eni's Anti-Corruption Compliance Program and is aimed at verifying that any third party intending to enter into a contractual relationship with Eni or other companies within Eni's perimeter of control complies with the ethical and anti-corruption principles established by Eni as part of the MSG Anti-Corruption and the existence of potential risk factors which must be taken into consideration (hereinafter "**Red Flags**").

#### 1. Contact details in relation to the processing

For matters relating to the processing of Personal Data carried out as part of the Due Diligence, you can contact the parent company at the following address:

Enilive Austria GmbH  
Enilive Marketing Austria GmbH  
Enimoov Austria GmbH  
Handelskai 94 – 96  
1200 Vienna, Austria  
Phone: 01 24070-0  
E-Mail: [info.at@enilive.com](mailto:info.at@enilive.com)

or at the following contact details: [datenschutz.at@enilive.com](mailto:datenschutz.at@enilive.com).

#### 2. Contact data of the Data Protection Officer ("DPO")

The Data Protection Officer can be contacted at the following email address [DPO@eni.com](mailto:DPO@eni.com).

#### 3. Categories of Personal Data

The Personal Data processed may include Data (i) requested within the Due Diligence and (ii) acquired autonomously by the Data Controller through the consultation of information present in publicly available databases, internet and media news sources and other databases of corporate information (e.g. Cerved, Cribis) in order to verify the presence of possible Red Flags.

If the above mentioned Data is not provided, the Due Diligence cannot be carried out for the

potential establishment of business relations with Eni or other companies within Eni's perimeter of control.

#### **4. Purpose of data processing and its legal basis**

Your Data will be processed, without the need for your consent, in cases where it is necessary for the Data Controller to pursue its legitimate interest of "fraud prevention" and specifically, the prevention of corruption offences that could expose it to serious reputational risks, as well as to sanctions deriving from the failure to comply with anti-corruption regulations to which the Data Controller is subject (e.g. Foreign Corrupt Practices Act, UK Bribery Act, Legislative Decree 231/01). Such data processing will be carried out by the Data Controller in compliance with the principles of purpose, relevance, adequacy and non-excessiveness.

In addition, your Data will be processed whenever it is necessary in order to ascertain, exercise or defend a right of the Data Controller or of other companies within Eni's perimeter of control in court.

#### **5. Personal Data Recipients**

For the pursuit of the purposes indicated in paragraph 4, Your Personal Data will be processed by personnel appointed by the Data Controller and may be communicated to:

- Police Forces, Armed Forces, Control Authorities, Judicial Authorities and other public administrations, for the fulfilment of obligations provided for by law, regulations or EU or supranational legislation. In these cases, according to the applicable legislation on data protection, there is no obligation to obtain the prior consent of the data subject for such communications;
- companies specialized in forensic activities on behalf of Eni S.p.A. and its direct or indirect subsidiaries or affiliates;
- other companies contractually bound to the Data Controller which carry out, by way of example, auditing activities for the purposes of ISO 37001 certification, accounting auditing activities, etc;
- companies of the Eni Group for the execution of processing operations having purposes related to those indicated in paragraph 4.

The Data will not be disseminated.

With reference to the Data communicated to them, the recipients belonging to the above mentioned categories may operate, depending on the cases, as data processors (and in this case they will receive appropriate instructions from the Data Controller) or as autonomous data controllers.

#### **6. Transfer of Personal Data outside the EU**

If it is instrumental for the purposes set out in paragraph 4, Your Personal Data may be transferred abroad to companies based outside the EU.

Some of these jurisdictions may not offer the same level of data protection as the country in which you reside. In this case, the Data Controller undertakes to ensure that the Data is processed with the utmost confidentiality by taking every necessary measure and entering into,

where required, agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission.

## **7. How Personal Data is processed and Retention Period**

Your Data will be stored in the Data Controller's electronic archives and protected by appropriate security measures for the time necessary to achieve the purposes set out in paragraph 4, and will subsequently be deleted. Your Personal Data may be retained for a later period in the event of any litigation, requests from the relevant authorities or pursuant to applicable legislation.

## **8. Rights of Data Subjects**

At any time, You will be entitled to obtain confirmation from the Data Controller (i) whether or not your Personal Data is being processed and, if so, to have access to the information referred to in Article 15 of the GDPR; (ii) the rectification of the inaccurate Data concerning You, or, taking into account the purpose of the data processing, the integration of incomplete Personal Data; (iii) the deletion of Your Personal Data, in the presence of one of the reasons referred to in Article 17 of the GDPR; and (iv) the restriction of the processing of Your Personal Data in cases required by applicable law. You will also have the right to object to the processing of Your Personal Data for particular reasons, where there are no legitimate vested interests of the Data Controller. These rights may be exercised by writing to the contact details referred to in paragraph 1 or by sending an email to the Data Protection Officer appointed by the Company at the following email [DPO@eni.com](mailto:DPO@eni.com).

Without prejudice to any other administrative or judicial remedy, You also have the right to lodge a complaint with the relevant supervisory authority. More information about the contact details to which complaints should be addressed is available at:

Österreichische Datenschutzbehörde  
Barichgasse 40 - 42  
1030 Vienna, Austria  
Phone: +43 1 52 152-0  
E-Mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)