



## Privacy notice for third parties Informativa sul trattamento dei dati personali per terze parti

Dear data subject,

**Eni Global Energy Markets SpA - EGEM** (“**Data Controller**” or the “**Company**”) is the data controller responsible for collection and the processing of your personal data in the context of your relationship – whatever the nature – with the Company. The privacy notices you can find below explain how the Company processes personal data – in the different jurisdictions where it operates – relating to persons/entities with whom it has contractual relationships in place, including their personnel or points of contact (“**data subjects**” or “**third parties**”).

The Company will process your personal data, including the personal data of your employees, independent contractors and individuals who belong to or represent your organisation and/or who are involved in your contractual relationship in place with the Company. This may include when you are a client of the Company, a counter-party (where the Company deals with you on its own or on behalf of its clients), a service provider, or where you have any other contractual relationship with the Company.

Depending on the jurisdiction where we operate, your relationship with the Company is governed by one of the privacy notices you can find attached. Listed below, indeed, are the privacy notices for all the jurisdictions where the Company operates, not all of which may apply to you.

In case of doubts, please verify with the Company as to which privacy notice is applicable to you, sending an email to: **data.controller.EGEM@eni.com**

<b>SECTION 1 - INFORMATIVA SUL TRATTAMENTO DEI DATI PERSONALI ITALIA.....</b>	<b>2</b>
<b>SECTION 2 - PRIVACY NOTICE UNITED KINGDOM.....</b>	<b>9</b>
<b>SECTION 3 - PRIVACY NOTICE SINGAPORE.....</b>	<b>18</b>
<b>SECTION 4 - PRIVACY NOTICE BELGIUM.....</b>	<b>25</b>
<b>SECTION 5 - PRIVACY NOTICE ITALY (ENGLISH TRANSLATION OF SECTION 1).....</b>	<b>34</b>



## SECTION 1 - INFORMATIVA SUL TRATTAMENTO DEI DATI PERSONALI ITALIA

**Eni Global Energy Markets SpA**, (“**Titolare**” o anche la “**Società**”) in qualità di titolare del trattamento dei dati personali inerenti ai soggetti con cui intrattiene relazioni contrattuali e alle persone di contatto presso questi ultimi (“**interessati**” o “**terze parti**”), Vi fornisce la presente informativa sul trattamento dei dati personali ai sensi del Regolamento (UE) 2016/679 (“**GDPR**”), e si impegna a trattare i Vostri dati personali in conformità al GDPR, al D.Lgs. 196/2003 e s.m.i (“**Codice Privacy**”), ai pertinenti provvedimenti e linee guida delle autorità per la protezione dei dati e giudiziarie nazionali ed europee, nonché alla normativa nazionale ed europea applicabile, ivi inclusa la normativa specificamente dettata per il settore di riferimento della Società (congiuntamente, “**Normativa Applicabile**”).

Il Titolare tratterà i Vostri dati personali, compresi i dati personali dei dipendenti, collaboratori e soggetti appartenenti alla Vostra organizzazione e/o comunque coinvolti nel rapporto con la Società, nel rispetto della Normativa Applicabile e degli obblighi di riservatezza cui è ispirata l’attività della Società.

Il Titolare raccoglie e tratta solo dati pertinenti e non eccedenti le finalità del trattamento e, quindi, solo i dati necessari al raggiungimento delle finalità di cui alla presente informativa: raccomanda, quindi, di non comunicare dati non necessari. Raccomanda altresì di non comunicare al Titolare dati personali di terzi, a meno che sia strettamente necessario per il raggiungimento delle finalità del trattamento: in questo caso, Vi ricorda di assolvere gli adempimenti di legge in materia di tutela dei dati personali e, in particolare, verificare la sussistenza di un’opportuna base giuridica e informare i terzi della comunicazione dei loro dati.

Con riferimento ai dati personali dei Vostri dipendenti, collaboratori e soggetti comunque coinvolti nel rapporto con la Società (e.g. nome e cognome, dati di contatto aziendali), Vi ricordiamo in particolare di fornire a tempo debito agli interessati copia della presente informativa.

### 1. **Identità e dati di contatto del Titolare del trattamento**

Il Titolare è Eni Global Energy Markets SpA, Codice Fiscale e Registro Imprese di Roma n. 11076280962 e Partita Iva n. 11076280962, con sede legale in Piazzale Enrico Mattei 1, 00144 Roma.

Eventuali richieste in merito al trattamento dei dati personali potranno essere trasmesse via posta all’indirizzo del Titolare Piazzale Enrico Mattei 1, 00144 Roma o via email al seguente indirizzo **data.controller.EGEM@eni.com**.

### 2. **Dati di contatto del Responsabile della Protezione dei Dati (“DPO”)**

La Società ha designato un Responsabile della Protezione dei Dati personali, che può essere contattato (unitamente al Titolare del trattamento), per qualsiasi richiesta in merito al trattamento dei dati personali, inviando un’email al seguente indirizzo **dpo@eni.com**.



### 3. Categorie di dati personali trattati

Il Titolare potrà trattare le seguenti categorie di dati personali, che potranno essere forniti e/o raccolti direttamente dagli interessati (anche nel corso del rapporto contrattuale e delle comunicazioni scambiate in esecuzione del medesimo) e/o raccolti da fonti pubbliche e/o pubblicamente accessibili.

In particolare, i dati trattati potranno includere:

- a) dati identificativi e anagrafici (e.g. nome e cognome, data di nascita, indirizzo di residenza o domicilio, codice fiscale);
- b) dati di contatto (e.g. indirizzo email, numero di telefono);
- c) dati finanziari e dati di pagamento (e.g. coordinate bancarie o postali);
- d) immagini raccolte tramite i servizi di videosorveglianza;
- e) la registrazione delle comunicazioni, tra cui (a) registrazioni di conversazioni telefoniche; (b) copie di comunicazioni elettroniche (ad esempio, email, messaggi istantanei, messaggi di testo, fax, messaggi sui social media); e (c) se siete terze parti, registrazioni di incontri in presenza che possono includere, senza limitazioni, i dettagli delle istruzioni che avete fornito, la data e l'ora degli incontri, il luogo degli incontri, l'identità dei partecipanti e informazioni rilevanti sull'ordine (compreso il prezzo, il volume, il tipo di ordine e quando sarà trasmesso o eseguito).

I dati di cui sopra saranno raccolti e trattati esclusivamente ove risulti necessario per il perseguimento delle finalità di cui al successivo punto 4, garantendone la massima riservatezza e confidenzialità, in ossequio in particolare ai principi di proporzionalità e necessità e, qualora divenuti irrilevanti e non più pertinenti rispetto alle finalità di cui al punto 4, gli stessi non saranno oggetto di ulteriore trattamento e verranno cancellati e/o anonimizzati.

### 4. Finalità del trattamento e base giuridica del trattamento

Il Titolare può trattare i dati personali per le seguenti finalità.

a) *Adempimento di obblighi di legge*

Il Titolare potrà trattare i dati personali per adempiere agli obblighi previsti dalla Normativa Applicabile, nonché dalle autorità di volta in volta competenti, ivi inclusi:

- il Regolamento (UE) n. 596/2014 relativo agli abusi di mercato ("**Regolamento MAR**");
- il Regolamento (UE) n. 1227/2011 concernente l'integrità e la trasparenza del mercato dell'energia all'ingrosso ("**Regolamento REMIT**").

Per adempiere alla Normativa Applicabile e, in particolare, alle disposizioni in tema di prevenzione di abusi di mercato, il Titolare potrebbe essere tenuto a registrare e conservare su un supporto durevole le conversazioni telefoniche e le comunicazioni elettroniche intercorrenti con la Società, nonché a registrare tutte le informazioni pertinenti relative a conversazioni "frontali" (e.g. data e ora dell'incontro, luogo di svolgimento, identità dei partecipanti, dettagli dell'ordine), e - su richiesta - a trasmetterle e/o consentirne l'accesso alle Autorità competenti e/o Società di gestione dei mercati regolamentati.



La base giuridica di tale trattamento consiste nella necessità di adempiere ad obblighi di legge (art. 6, paragrafo 1, lett. c) GDPR).

b) *Finalità contrattuali*

Il Titolare potrà trattare i dati personali per la gestione di richieste pre-contrattuali e per la negoziazione, l'instaurazione e l'esecuzione del rapporto contrattuale, nonché i relativi adempimenti di carattere amministrativo, fiscale e contabile.

La base giuridica di tale trattamento consiste nella necessità di eseguire un contratto di cui è parte l'interessato e/o misure precontrattuali adottate su richiesta dello stesso (art. 6, par. 1, lett. b) GDPR).

c) *Interesse legittimo del Titolare o di terzi*

Il Titolare potrà trattare i dati personali, comprese le registrazioni delle conversazioni telefoniche e delle comunicazioni elettroniche, anche nelle seguenti ipotesi:

- ai fini dello svolgimento di verifiche interne/*audit* volte all'accertamento della possibile commissione di atti illeciti/frodi e/o di presunte violazioni di obblighi di cui il Titolare sia venuto a conoscenza in conformità alla normativa aziendale e nel rispetto dei principi stabiliti dalla normativa a protezione dei dati personali e da quella lavoristica;
- per esigenze di controllo interno del Titolare e di monitoraggio dei rischi aziendali;
- per la prevenzione di atti illeciti/frodi;
- per fini amministrativo/contabili, organizzazione interna e contenimento dei costi, nel contesto dell'accentramento di funzioni in capo a determinate società del Gruppo Eni;
- per accertare, esercitare o difendere un diritto o un interesse del Titolare o di un terzo (comprese altre società del Gruppo Eni) in sede giudiziaria e/o in via stragiudiziale;
- ai fini di operazioni straordinarie coinvolgenti il Titolare (ivi incluse fusioni, acquisizioni, cessioni, riorganizzazioni aziendali, ristrutturazioni aziendali).

Qualora tali attività non siano basate sulla necessità di eseguire un contratto di cui è parte l'interessato e/o misure precontrattuali adottate su richiesta dello stesso (art. 6, par. 1, lett. b) GDPR – vedi punto 4, lett. a)) e/o di eseguire un obbligo di legge (art. 6, par. 1, lett. c) GDPR – vedi punto 4, lett. b)), saranno basate sulla necessità di perseguire il legittimo interesse del Titolare o di terzi (art. 6, paragrafo 1, lett. f) GDPR). Per maggiori informazioni sul legittimo interesse perseguito e sul giudizio di bilanciamento condotto dal Titolare, è possibile rivolgersi al Titolare contattandolo ai recapiti indicati nella presente informativa.

d) *Marketing*

Il Titolare potrà trattare i Vostri dati di contatto anche per finalità di invio di comunicazioni commerciali (compresi inviti a eventi organizzati dal Titolare) qualora, nel contesto dell'acquisto di un prodotto o di un servizio del Titolare, abbiate fornito i Vostri dati di contatto e non abbiate esercitato, anche successivamente, il diritto di opposizione alla ricezione di comunicazioni commerciali, che saranno comunque limitate a prodotti e servizi analoghi a quelli acquistati (c.d. soft-spam).

La base giuridica di tale trattamento consiste nel legittimo interesse del Titolare (art. 6, paragrafo 1, lett. f) GDPR). Sarà possibile opporsi in qualsiasi momento alla ricezione di comunicazioni



commerciali. Il diritto di opposizione potrà essere esercitato contattando il Titolare ai recapiti indicati nella presente informativa e/o seguendo le indicazioni contenute nelle comunicazioni ricevute. Nel caso di esercizio del diritto di opposizione, Lei non potrà ricevere comunicazioni commerciali dalla Società ma non ci saranno conseguenze sul Suo rapporto con la Società.

e) *Videosorveglianza*

Il Titolare potrà trattare altresì i dati consistenti nelle videoregistrazioni eseguite dall'impianto di videosorveglianza in uso presso i propri stabilimenti ed uffici.

Per una descrizione di tale trattamento, si rinvia all'informativa dedicata.

## **5. Natura del conferimento e conseguenze in caso di mancata comunicazione**

Il conferimento dei dati personali per le finalità di cui al punto 4, lett. a) e b) è obbligatorio, in quanto tali dati sono necessari per adempiere, rispettivamente, a un obbligo legale e/o a un obbligo contrattuale; in caso di mancato conferimento dei dati personali, non sarà possibile concludere e dare esecuzione al contratto e/o rendere il servizio che ne forma oggetto.

Il conferimento dei dati personali per le finalità di cui al punto 4, lett. c) è necessario per il perseguimento del legittimo interesse del Titolare. L'interessato ha il diritto di opporsi al trattamento basato sul legittimo interesse, in conformità con quanto disposto al punto 10 della presente informativa; in caso di opposizione all'utilizzo di tali informazioni per le finalità indicate, tuttavia, potrebbe non essere possibile, per il Titolare, continuare ad eseguire il rapporto contrattuale.

Il conferimento dei dati personali per le finalità di cui al punto 4, lett. d) è facoltativo. Nel caso di trattamento basato sul legittimo interesse, sarà possibile opporsi in qualsiasi momento alla ricezione di comunicazioni commerciali. L'opposizione al trattamento non avrà alcuna conseguenza sull'eventuale rapporto contrattuale instaurato e/o da instaurare con il Titolare.

## **6. Modalità di trattamento**

Il trattamento avverrà sia con mezzi manuali che automatizzati, adeguati a garantirne la sicurezza e la riservatezza e, in entrambi i casi, assicurando la protezione dei dati personali fin dalla progettazione e per impostazione predefinita, e previa adozione delle misure di sicurezza tecniche e organizzative che, tenendo conto dello stato dell'arte e dei costi di attuazione, nonché della natura, dell'oggetto, del contesto e delle finalità del trattamento, come anche del rischio di varia probabilità e gravità per i diritti e le libertà delle persone fisiche, sono adeguate per garantire un livello di sicurezza adeguato al rischio, con specifico riferimento alla prevenzione e riduzione dei rischi presentati dal trattamento che derivano, in particolare, dalla distruzione, dalla perdita, dalla modifica, dalla divulgazione non autorizzata o dall'accesso, in modo accidentale o illegale, a dati personali trasmessi, conservati o comunque trattati. Tali misure comprendono, tra le altre: la pseudonimizzazione e la cifratura dei dati personali; la capacità di assicurare su base permanente la riservatezza, l'integrità, la disponibilità e la resilienza dei sistemi e dei servizi di trattamento; la capacità di ripristinare tempestivamente la disponibilità e l'accesso dei dati personali in caso di incidente fisico o tecnico; una procedura per testare, verificare e valutare regolarmente l'efficacia delle misure tecniche e organizzative al fine di garantire la sicurezza del trattamento.



## 7. Periodo di conservazione dei dati personali

I dati saranno trattati per un periodo di tempo non superiore a quello necessario al raggiungimento degli scopi per i quali sono stati raccolti e trattati, e per l'eventuale maggior periodo necessario per adempiere ad obblighi di legge e/o per fini di tutela giudiziaria, nel rispetto dei termini prescrizionali ordinari.

In particolare, a titolo esemplificativo, i dati raccolti e trattati per adempiere agli obblighi specifici di cui alla normativa comunitaria citata nel precedente punto 4, lett. a) saranno in ogni caso conservati per un periodo di almeno 5 anni.

## 8. Destinatari dei dati personali

Nei limiti di quanto necessario al perseguimento delle finalità di cui al precedente punto 4, la Società potrà comunicare i dati personali alle seguenti categorie di soggetti:

- soggetti che forniscono specifici servizi di consulenza legale e/o fiscale/tributaria, istituti bancari e/o di credito, compagnie assicurative, soggetti che forniscono servizi di gestione e manutenzione dei sistemi informativi, fornitori di servizi di archiviazione documentale o elettronica o traduzione, internal auditor e società di revisione;
- società, enti o associazioni, ovvero filiali/sedi secondarie, società controllanti, controllate o collegate ai sensi dell'articolo 2359 del codice civile, ovvero tra queste le società sottoposte a comune controllo, nonché consorzi, reti di imprese, raggruppamenti e associazioni temporanee di imprese e soggetti ad essi aderenti, anche nel contesto di operazioni straordinarie coinvolgenti il Titolare (ivi incluse fusioni, acquisizioni, cessioni, riorganizzazioni aziendali, ristrutturazioni aziendali);
- soggetti autorizzati da disposizioni di legge a venire a conoscenza di tali dati quali, ad esempio, le Autorità comunitarie e italiane operanti nel settore dell'energia elettrica e del gas (tra cui, a titolo esemplificativo, l'Agenzia per la cooperazione fra i regolatori nazionali dell'energia e l'Autorità di Regolazione per Energia Reti e Ambiente) e altre Pubbliche Autorità.

Tali soggetti agiranno, a seconda dei casi, come titolari autonomi del trattamento (nel qual caso la comunicazione dei dati sarà limitata a quanto necessario al raggiungimento delle finalità del trattamento di cui al punto 4, e avverrà in forza delle medesime basi giuridiche di cui al punto 4) o come responsabili del trattamento, in quest'ultimo caso in forza di uno specifico accordo scritto sul trattamento dei dati personali e seguendo le istruzioni agli stessi impartite dal Titolare. Un elenco dettagliato ed aggiornato di tali soggetti e delle loro qualifiche privacy può essere richiesto alla Società.

I dati saranno altresì trattati dal personale del Titolare nonché dei soggetti sopra indicati, in forza di specifiche istruzioni e disposizioni contrattuali.

I dati personali non saranno oggetto di diffusione.

## 9. Trasferimento internazionale dei dati personali

Laddove necessario per il perseguimento delle finalità di cui al precedente punto 4, i dati personali potranno essere trasferiti oltre lo Spazio Economico Europeo ("SEE"), anche mediante



l'inserimento in database condivisi e/o gestiti da terze società facenti o meno parte del Gruppo Eni.

Tutte le volte in cui i dati personali dovessero essere oggetto di trasferimento al di fuori dello SEE e, in particolare, verso Stati che non beneficiano di una decisione di adeguatezza della Commissione Europea, il trasferimento avverrà esclusivamente (i) previa sottoscrizione delle clausole contrattuali standard adottate dalla Commissione Europea e adozione di ogni ulteriore misura tecnica e organizzativa idonea a garantire un livello di protezione dei dati personali adeguato e, comunque, almeno pari a quello garantito all'interno dello SEE, o (ii) in presenza di una delle condizioni di cui all'art. 49 GDPR.

## 10. Diritti degli interessati

Agli interessati sono riconosciuti, ove applicabili e nei limiti individuati dalle disposizioni di legge e, in particolare, dall'art. 2-*undecies* del Codice Privacy, i diritti di cui agli articoli 15 e seguenti del GDPR, riassunti a seguire.

- a. *Diritto di accesso* (art. 15 GDPR): l'interessato ha il diritto di ottenere dal Titolare la conferma che sia o meno in corso un trattamento di dati personali che lo riguarda e, in tal caso, di ottenere l'accesso ai dati personali e alle seguenti informazioni: (i) le finalità del trattamento; (ii) le categorie di dati personali in questione; (iii) i destinatari o le categorie di destinatari a cui i dati personali sono stati o saranno comunicati, in particolare se destinatari di paesi terzi o organizzazioni internazionali; (iv) quando possibile, il periodo di conservazione dei dati personali previsto oppure, se non è possibile, i criteri utilizzati per determinare tale periodo; (v) il diritto di proporre reclamo a un'autorità di controllo.
- b. *Diritto di rettifica* (art. 16 GDPR): l'interessato ha il diritto di ottenere dal Titolare la rettifica dei dati personali inesatti che lo riguardano senza ingiustificato ritardo, nonché, tenuto conto delle finalità del trattamento, ha il diritto di ottenere l'integrazione dei dati personali incompleti, anche fornendo una dichiarazione integrativa. Anche a tal fine, l'interessato è pregato di voler comunicare al Titolare, utilizzando i recapiti indicati nella presente informativa, ogni eventuale modifica e/o aggiornamento dei propri dati personali trattati sempre ai sensi della presente informativa.
- c. *Diritto alla cancellazione* (c.d. diritto all'oblio, art. 17 GDPR): l'interessato ha il diritto di ottenere dal Titolare la cancellazione dei dati personali che lo riguardano senza ingiustificato ritardo e il Titolare ha l'obbligo di cancellare senza ingiustificato ritardo i dati personali, qualora: (i) i dati non siano più necessari rispetto alle finalità per cui sono stati trattati; (ii) l'interessato si opponga al trattamento e non vi sia un motivo legittimo prevalente; (iii) i dati personali siano stati trattati illecitamente; (iv) i dati personali debbano essere cancellati per obbligo di legge; (v) si tratti di dati personali raccolti relativamente all'offerta di servizi della società dell'informazione di cui all'art. 8, par. 1, GDPR.

La Società ha, tuttavia, il diritto di rigettare la richiesta di cancellazione se prevale il diritto alla libertà di espressione e di informazione, ovvero per l'esecuzione di un obbligo di legge, o per difendere un proprio diritto in giudizio, o per perseguire un interesse legittimo.





- d. *Diritto di limitazione del trattamento* (art. 18 GDPR): l'interessato ha il diritto di ottenere dal Titolare la limitazione del trattamento nei seguenti casi: (i) l'interessato contesta l'esattezza dei dati personali, per il periodo necessario al Titolare per verificare l'esattezza di tali dati personali; (ii) in caso di trattamento illecito dei dati personali; (iii) anche se i dati personali non sono necessari per le finalità del trattamento, l'interessato ha la necessità che vengano trattati per l'accertamento, l'esercizio o la difesa di un diritto in sede giudiziaria; (iv) per il periodo necessario alla verifica in merito all'eventuale prevalenza dei motivi legittimi del Titolare rispetto alla richiesta di opposizione al trattamento.
- e. *Diritto alla portabilità dei dati* (art. 20 GDPR): l'interessato ha il diritto di ricevere in un formato strutturato, di uso comune e leggibile da dispositivo automatico i dati personali forniti nel contesto dell'esecuzione di un contratto, e ha il diritto di trasmettere e/o far trasmettere tali dati a un altro titolare del trattamento senza impedimenti da parte della Società.
- f. *Diritto di opposizione* (art. 21 GDPR): l'interessato ha il diritto di opporsi in qualsiasi momento, per motivi connessi alla sua situazione particolare, al trattamento dei dati personali che lo riguardano ai sensi dell'art. 6, par. 1, lett. f) GDPR, compresa la profilazione. Resta salva la possibilità per il Titolare di continuare il trattamento dimostrando l'esistenza di motivi legittimi cogenti che prevalgono sugli interessi, i diritti e le libertà dell'interessato.
- g. *Diritto di presentare un reclamo dinanzi al Garante per la protezione dei dati personali e/o un ricorso all'autorità giudiziaria.*

I diritti sopra elencati potranno essere esercitati in qualsiasi momento, scrivendo ai seguenti recapiti: **data.controller.EGEM@eni.com**; oppure, scrivendo al DPO all'indirizzo email **dpo@eni.com**. Il diritto di opposizione alla ricezione di comunicazioni commerciali potrà, altresì, essere esercitato seguendo le indicazioni contenute nelle comunicazioni commerciali.

## **11. Modifiche e aggiornamenti dell'informativa sul trattamento dei dati personali e importanza di trattare dati aggiornati**

La presente informativa potrebbe essere successivamente modificata o aggiornata. Eventuali modifiche e aggiornamenti verranno tempestivamente comunicati con le seguenti modalità: aggiornamento della pagina Eni Global Energy Markets SpA inserita su [www.eni.com](http://www.eni.com).

È importante che i dati personali in nostro possesso siano precisi e aggiornati. Vi preghiamo di tenerci informati se i Vostri dati personali dovessero cambiare nel corso della gestione del rapporto con noi.





## SECTION 2 - PRIVACY NOTICE UNITED KINGDOM

**Eni Global Energy Markets SpA** (“**Data Controller**” or the “**Company**”) is the data controller responsible for the collection and processing of your personal data. This privacy notice explains how the Company processes personal data relating to persons/entities with whom it has contractual relationships, including their personnel or points of contact (“**data subjects**” or “**third parties**”).

The Company will process your personal data, including the personal data of your employees, independent contractors and individuals who belong to or represent your organisation and/or who are involved in your contractual relationship with the Company. This may include when you are a client of the Company, a counter-party (where the Company deals with you on its own behalf or on behalf of its clients), a service provider, or where you have any other contractual relationship with the Company.

The Company only collects and processes the personal data it requires for the specific purposes of processing set out at paragraph 4 below. Therefore, please do not disclose or communicate any personal data to us unless strictly necessary for these purposes of processing. Where you do disclose or communicate any personal data to us, please bear in mind your responsibility to comply with your obligations under applicable laws (including data protection laws), including ensuring that you have a valid legal basis to share the data with us, and to inform the individuals in question that their data are being communicated or disclosed to us.

We would suggest that you provide all relevant data subjects with a copy of this privacy notice at (or before) the time their personal data is shared with us.

### 1. Identity and contact details of the Data Controller

The Data Controller is Eni Global Energy Markets SpA UK Branch, registered with the UK Companies’ House under no. BR022574 and VAT no. GB362894854, with registered office in Eni House, 10 Ebury Bridge Road, London SW1W 8PZ.

Any queries, complaints or requests related to the processing of your personal data may be sent by mail to the address of the Data Controller Eni House, 10 Ebury Bridge Road, London SW1W 8PZ or by email to the following address **data.controller.EGEM@eni.com**.

### 2. Contact details of the Data Protection Officer (“DPO”)

The Company has designated a Data Protection Officer, who may also be contacted (together with the Data Controller), in relation to any queries, complaints or requests related to the processing of your personal data, by sending an email to the following address: **dpo@eni.com**.

### 3. Categories of personal data processed

The Data Controller may collect and process your personal data, which may be provided by and/or collected by us: (i) directly from you (including whilst the contractual relationship is ongoing and in the context of communications exchanged in implementation thereof); (ii) publicly accessible sources (e.g. Companies House or the UK Financial Conduct Authority



register); (iii) other third parties with whom we interact during the course of carrying out our activities (e.g. clients, counter-parties, clearing houses and exchanges, financial institutions and relevant public authorities and law enforcement agencies); and (iv) through our monitoring and recording of communications with you or through our use of CCTV when you visit our premises.

The personal data processed by us may include:

- a) identification data (e.g. first name and surname, job title, date of birth, place of residence or domicile, tax resident information, tax code);
- b) contact details (e.g. email address, telephone number, postal address);
- c) financial and payment data (e.g. bank account or post office account details);
- d) images and video footage collected through our use of CCTV when you visit any of our premises;
- e) monitoring and recording of your communications with us which may include (a) recordings of telephone conversations, (b) copies of electronic communications (e.g. email, instant messages, text messages, fax, social media messages), and (c) where you are a client, records of face-to-face meetings which may include, without limitation, details of instructions that you have given to us, the date and time of meetings, location of meetings, identity of attendees, initiator of the meetings, and relevant information about your order (including the price, volume, type of order and when it will be transmitted or executed).

The above data will be collected and processed only where strictly necessary in order to fulfil the purposes set out in paragraph 4 below, thus guaranteeing the utmost confidentiality and anonymity of such data, specifically, in compliance with the principles of proportionality and necessity. If personal data is no longer needed for the purposes for which it was collected (as set out in paragraph 4 below), the processing of that data will cease and it shall be deleted and/or anonymised.

#### 4. Purposes and legal basis of the processing

The Data Controller may process personal data for the following purposes.

a) *Compliance with legal obligations*

The Data Controller may process personal data in order to ensure compliance with legal and regulatory obligations. These legal and regulatory obligations include (but are not limited to) the applicable requirements of the following European Union legislation (and any domestic implementation, replacement or amendment of this legislation in the United Kingdom as a result of the United Kingdom withdrawing from the European Union):

- Regulation (EU) No 596/2014 on market abuse (**MAR Regulation**); and
- Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (**REMIT Regulation**).

Additionally, in certain circumstances, we are legally required to monitor and record communications that you may have with us. These requirements are set out in the UK Financial Conduct Authority Handbook, as well as other applicable legislation. Please see



sub-paragraph (f) (Monitoring and recording of communications) below for further information.

b) *Contractual purposes*

The Data Controller may process personal data for the management of pre-contractual requests and for the negotiation, commencement and performance of the contractual relationship with you, as well as the related administrative, fiscal and accounting compliance requirements.

c) *Legitimate interest pursued by the Data Controller or by a third party*

The Data Controller may process your personal data where it is necessary for its legitimate interests. This includes where the use of your personal data is necessary:

- to manage our relationship with you, which may include communicating with you, notifying you about changes to our terms and conditions and privacy practices, and asking you leave reviews or participate in surveys;
- in order to carry out internal checks/audits aimed at ascertaining any illegal/fraudulent conduct and/or breach of obligations that have come to the Data Controller's attention, in accordance with applicable laws and regulations;
- for the Data Controller's internal control and policy purposes and for the monitoring of corporate risks;
- for the prevention of illegal/fraudulent acts or conduct;
- to ensure effective administration and management of the Data Controller's business (including, for management/accounting, internal organisation and cost containment purposes, in the context of the centralisation of functions to specific companies in the Data Controller's group);
- to ascertain, exercise or defend a right or interest of the Data Controller or of a third party (including other companies in the Data Controller's group) in court and/or out of court;
- for the purposes of special corporate transactions involving the Data Controller (including mergers, acquisitions, transfers, company reorganisations and restructurings);
- to ensure the safety and security of the Data Controller's staff, assets and premises (e.g. when using CCTV);
- to prevent, detect, or investigate unauthorised use of the Data Controller's systems and equipment;
- to send you marketing and promotional communications; and
- for the specific legitimate interests pursued when monitoring and recording certain communications with you, as further detailed in sub-paragraph (f) (Monitoring and recording of communications) below.

For further information on the legitimate interests pursued (and on the Data Controller's balancing of interests for this purpose), please contact the Data Controller using the details given above.



d) *Marketing*

The Data Controller may process your contact details for the purpose of sending you marketing communications (including invitations to events organised by the Data Controller) if, when purchasing a product or service of the Data Controller, you provided your contact details and did not opt-out of receiving such marketing at the time. The Data Controller will only send you marketing communications about products and services similar to those you have already purchased.

The legal basis for such data processing is the legitimate interest pursued by the Data Controller in promoting its products and services. Data subjects can at any time opt-out of marketing communications by contacting the Data Controller at the addresses indicated in this privacy notice and/or by following the instructions given in the marketing communications received. If you opt-out of receiving marketing communications this will have no impact on your commercial relationship with the Company.

e) *Video surveillance*

When you visit the Data Controller's premises, the Data Controller may also process data that consists of images and video footage recorded by the CCTV systems in use in its facilities and offices. Where CCTV is in operation, it will be clearly marked or indicated with appropriate signage visible on-premises.

The Data Controller operates CCTV at its premises to ensure the safety and security of its staff and property, to control access to the Data Controller's sites and offices, to protect the Data Controller's personnel and assets against assault, theft, robbery, damage, vandalism and any action or event that may cause actual or potential harm to human resources or to any assets or property of the Data Controller.

For further information on the Data Controller's use of CCTV, please refer to the dedicated information sheet provided to you or contact us at the details provided above.

f) *Monitoring and recording of communications*

Please note that it is a legal requirement that the Company must record telephone conversations, and keep a copy of electronic communications, that relate to the trading activities carried on by it, in accordance with applicable legislation, including the requirements set out for such monitoring and recording by the UK Financial Conduct Authority.

This means that when you communicate with us in relation to our trading activities, either by telephone or via a means of electronic communications (e.g. such as email or fax), we are required to keep a record of this communication.

Additionally, where you are a client, we are required to keep a record of any face-to-face meeting we have with you. These records must be kept in a durable medium (e.g. written minutes, mail, fax, or documentation of your instructions issued at meetings). These records may contain details of instructions that you have given to us, the date and time of meetings, location of meetings, identity of attendees, initiator of the meetings, and relevant information



about your order (including the price, volume, type of order and when it will be transmitted or executed).

In addition to complying with its legal obligations, communications recording and monitoring is undertaken by the Company for the following legitimate interests: (i) to protect the Company, its employees and clients against disagreements or legal claims in relation to operations or trading activities carried out through the Company's communications systems; (ii) to protect against the unauthorised access to or dissemination of the Company's information; (iii) to ensure compliance by staff with all policies and procedures applicable to their employment with the Company, and the terms of their employment contracts; (iv) to detect and prevent unlawful activity; (v) to prevent reputational risk and/or any civil or criminal liability on the part of the Company due to the acts or omissions of any staff; (vi) to undertake investigations in the context of internal or external complaints or potential disciplinary issues; and (vii) for internal compliance and audit purposes.

Recordings and copies of communications may be requested by various internal departments within the Company. For example, such records may be requested by Internal Audit for audit purposes, or by our Compliance team for compliance purposes. Access to recordings may also be requested by regulatory and law enforcement authorities.

Where you are a client, a copy of the recording of conversations and communications will be made available to you on request. Records of telephone conversations and electronic communications must be kept for a period of five years, and, for a period of seven years where required by the UK Financial Conduct Authority.

For further information on the monitoring and recording of communications, please contact us using the details provided above.

## **5. Nature of the data provision and the consequences of not providing personal data**

The provision of personal data for the purposes referred to in paragraph 4(a) and (b) is mandatory, as such data is required by us to comply with our legal obligations and/or for us to perform our contractual obligations, respectively. In the event that you do not provide personal data where required, it may not be possible to enter into and implement the contract and/or to provide the contractual service in question.

The provision of personal data for the purposes referred to in section 4(c) is required in order to enable the Data Controller to pursue its legitimate interests. Data subjects are entitled to object to data processing operations based on the Data Controller's legitimate interests, in accordance with the provisions of paragraph 10 of this privacy notice. However, if you object to the use of such information, it may not be possible for the Data Controller to continue to implement the contractual relationship with you (including providing you with products and/or services).

## **6. Means of the data processing**

Data processing will be carried out using manual and automated means that can guarantee the security and confidentiality of personal data. This will be achieved by (i) ensuring "data protection by design and by default" when designing and carrying out processing activities and



business practices, and (ii) the adoption of technical and organisational security measures which are adequate to ensure data security levels commensurate with the relevant risks associated with the data processing (in particular, the risks posed by the destruction, loss, alteration, unauthorised disclosure of, or accidental or illegal access to personal data transmitted, stored or otherwise processed).

These security measures include, among other things: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of data processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and a procedure to regularly test, verify and assess the effectiveness of technical and organisational measures to ensure secure data processing operations.

## **7. Data retention**

Personal data will be processed for as long as reasonably necessary to fulfil the purposes for which the data were collected and processed in the first place, and for any longer period that proves necessary in order to facilitate compliance with legal, regulatory, tax, accounting or reporting obligations. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

When we no longer need to use your personal data, we will remove it from our systems and records, and or take steps to anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations we are subject to).

## **8. Personal data recipients**

To the extent necessary in order to fulfil the purposes under paragraph 4 above, the Company may communicate personal data to the following categories of recipient:

- persons/entities providing professional services (e.g. legal, auditing (including internal auditors), accounting or tax consulting services), banking and/or credit institutions, insurance companies, and companies specialising in credit recovery;
- vendors who will process your personal data on our behalf and under our written instructions to carry out their services during the course of our business, such as providers of IT services (including information systems management and maintenance services), document storage services, translation services, marketing services, technology platforms, customer relationship management services, and other cloud-based solution providers that are used by us in the conduct of our business;
- other companies and branches in our group, including whether those companies/branches are located in another country (for example, in Belgium, Italy, Singapore, and the US), where this is necessary for us to provide products or services to you, or to receive products or services from you, for administrative, management, compliance and accounting purposes, and as part of our regular reporting activities on company performance, in the





context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data;

- any of our joint venture partners;
- tax, audit, and regulatory bodies, courts or other authorities, where we are required to communicate the personal data to them pursuant to legal or regulatory requirements; and
- where the Company merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company and/or their professional advisors and agents (and provide you with notice of this disclosure).

These persons/entities will act (i) as independent data controllers (in which case the data communication shall be strictly limited to what is required in order to fulfil the data processing purposes referred to in paragraph 4, and will have the same legal bases as those indicated in paragraph 4), or (ii) as data processors (in which case the communication will be based on a specific written agreement governing the processing of personal data, and requiring the data processor to follow the instructions provided to it by the Data Controller). A detailed and updated list of these persons/entities and their data privacy qualifications may be requested from the Company.

Personal data will also be processed by the Data Controller's personnel, as well as by the relevant personnel of the aforementioned persons/entities based on specific instructions and contractual provisions.

## **9. International transfer of personal data**

Where necessary in order to fulfil the purposes referred to in paragraph 4 above, personal data may be transferred to countries outside the United Kingdom and/or the European Economic Area ("EEA"), including (amongst other methods) by inclusion in databases shared and/or managed by the third-parties specified in paragraph 8 above. This will only be done where:

- the transfer of this information is to a country outside the EEA and/or UK that is deemed by the European Commission and/or UK authorities to provide an adequate level of protection for your personal data;
- the transfer of this information is governed by a contract including Standard Contractual Clauses approved by the European Commission and/or UK authorities in accordance with applicable data protection laws (including, the General Data Protection Regulation or Data Protection Act 2018);
- where it is necessary for the conclusion or performance of a contract between ourselves, or between the Company and a third party where the transfer is in your interests; or
- where you have consented to the transfer.

If you would like to obtain further information on the safeguards the Company has put in place when transferring your personal data outside the UK and/or EEA, or copies of the regulator-approved Standard Contractual Clauses please contact us using the details given above.





## 10. Data subjects' rights

Data subjects have a number of rights in relation to the Data Controller's handling of their personal data. These include:

- a. *Right of access*: the data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, if so, access to the personal data and to the following information: (i) the purposes of the data processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if they are recipients from third countries or international organisations; (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (v) the right to lodge a complaint with a supervisory authority.
- b. *Right to rectification*: the data subject shall have the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning him/her, and also – taking into account the purposes of the processing – the right to have incomplete personal data completed, including by providing a supplementary statement. The data subject is also requested, to this end, to notify the Data Controller (using the contact details indicated in this privacy policy) of any change and/or update to his/her personal data processed in accordance with this privacy policy.
- c. *Right to erasure* (the right “to be forgotten”): the data subject shall have the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning him/her, and the Data Controller shall have the obligation to erase personal data without undue delay if: (i) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) the data subject objects to the processing and no legitimate reason exists which overrides such opposition; (iii) the personal data have been unlawfully processed; (iv) the personal data have to be erased for compliance with a legal obligation; (v) the data in question are personal data collected in relation to the offer of information society services.

The Company is however entitled to reject the request for data erasure to the extent that processing is necessary: (i) for exercising the right of freedom of expression and information; (ii) to comply with a legal obligation; or (iii) to establish, exercise or defend legal claims.

- d. *Right to restriction of processing*: the data subject shall have the right to obtain from the Data Controller restriction of processing in the following cases: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data; (ii) the processing is unlawful; (iii) the personal data are not required by the Data Controller for data processing purposes, but the data subject needs the data for the establishment, exercise or defence of legal claims; (iv) where the data subject has exercised their right to object to processing (as explained below), for the period of time required in order to verify whether the legitimate grounds of



the Data Controller override those concerning the data subject's request to object to the data processing.

- e. *Right to data portability:* the data subject shall have the right to receive from the Data Controller his/her personal data (where the processing is based on the data subject's consent, or the data was provided in the context of implementing a contract with the data subject) in a structured, commonly used and machine-readable format, and also to transmit those data to another controller without hindrance from the Company;
- f. *Right to object:* the data subject shall have the right to object, for reasons related to his/her particular situation, at any time to processing of his/her personal data pursuant to the Company's legitimate interests, including profiling. This is without prejudice to the Data Controller's entitlement to continue with the data processing operations by demonstrating that good and legitimate reasons exist which prevail. The Company may refuse to comply with a data subject's objection to processing, where the Company (i) can demonstrate compelling legitimate reasons which override the data subject's interests, rights and freedoms, or (ii) requires the data to establish, exercise or defend legal claims.
- g. *Right to contact a supervisory authority:* data subjects also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where they are habitually resident, where they work or where an alleged infringement of data protection law has taken place. In the UK a data subject can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the opportunity to deal with your concerns before you contact a supervisory authority, so please contact us with any queries or concerns in the first instance.

The rights listed above may be exercised at any time by writing to the following addresses: **[data.controller.EGEM@eni.com](mailto:data.controller.EGEM@eni.com)**; or by writing to the DPO at **[dpo@eni.com](mailto:dpo@eni.com)**.

Additionally, the right to opt-out of marketing communications (as described in paragraph 4(d) above) may be exercised by contacting the Data Controller on the details above, or by following the instructions contained in the relevant marketing communications.

## **11. Changes and updates to the privacy notice for the processing of personal data and importance of keeping your data updated**

This privacy notice may be amended or updated from time to time. We will communicate any changes and updates by updating this privacy notice published on Eni Global Energy Markets SpA section on our website ([www.eni.com](http://www.eni.com)). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



### SECTION 3 - PRIVACY NOTICE SINGAPORE (this "Notice")

**Eni Global Energy Markets SpA**, in its capacity as data controller ("**Data Controller**", the "**Company**", "**we**", "**us**". or "**our**") for personal data involving persons/entities with whom it has contractual relationships and their point of contacts ("**data subjects**" or "**third parties**"), provides you with this privacy policy on the collection, use, disclosure and processing (collectively, "**Processing**" or "**Process**") of personal data pursuant to applicable data protection regulation, including, Regulation (EU) 2016/679 ("**GDPR**") and the Singapore Personal Data Protection Act 2012 ("**PDPA**") and undertakes to process your personal data in accordance with the GDPR and PDPA, with the relevant provisions and guidelines of European data protection and judicial authorities, as well as with applicable domestic legislation, including legislation specifically designed for the Company's reference sector (together, the "**Applicable Regulations**"). By providing the Company with personal data, you consent to, and acknowledge that, our Processing your personal data will be in accordance with this Notice.

The Data Controller will process your personal data, including the personal data of employees, independent contractors and parties who belong to your organisation and/or who are involved in a contractual relationship with the Company, in compliance with the Applicable Regulations and with the confidentiality obligations characterising the Company's activities.

The Data Controller collects and processes only relevant data, exclusively for the specific purposes of the Processing and, accordingly, only data that is required in order to fulfil the purposes set out in this privacy notice: therefore, the Data Controller advises you that unnecessary data should not be communicated or disclosed, and also that third-party data should not be communicated to the Data Controller, unless strictly necessary for the purposes of the Processing. If this should occur, the Data Controller reminds you that you need to comply with applicable legislative and regulatory provisions for the protection of personal data and, specifically, to verify that a proper legal basis exists for the data processing operations, inform the third parties in question that their data are being communicated or disclosed and obtain the party's consent to your disclosure of the party's data to the Data Controller for those purposes.

In relation to the personal data of your employees, of independent contractors and of persons/entities otherwise involved in the contractual relationship with the Company (e.g., name and surname, company contact details), we remind you that data subjects should be given a copy of this privacy policy in due time.

#### 1. Identity and contact details of the Data Controller

The Data Controller responsible for your personal data is Eni Global Energy Markets SpA Singapore Branch, registered under no. T20FC0076F and VAT no. M90373579L, with registered office in Orchard Road 391A, 29. 04 Ngee Ann City Tower A. Singapore.

Any queries, complaints or requests related to the processing of personal data may be sent by mail to the address of the Data Controller Orchard Road 391A, 29. 04 Ngee Ann City Tower A. Singapore or by email to the following address **data.controller.EGEM@eni.com**.



## 2. Contact details of the Data Protection Officer (“DPO”)

The Company has designated a Data Protection Officer, who may be contacted (together with the Data Controller), for any queries, complaints or request related to the processing of personal data, by sending an email to the following address: **dpo@eni.com**.

## 3. Categories of personal data processed

The Data Controller may process the following categories of personal data, which may be (1) provided by and/or collected directly from data subjects (also while the contractual relationship is ongoing and in the context of communications exchanged in implementation thereof) and/or (2) third parties and/or (3) collected from public and/or publicly accessible sources.

More specifically, the data Processed may include:

- a) identification data (e.g. name and surname, date of birth, address of residence or domicile, tax code);
- b) contact details (e.g. email address, telephone number);
- c) financial and payment data (e.g. bank account or post office account details);
- d) images collected through video surveillance services;
- e) monitoring and recording of your communications with us which may include (a) recordings of telephone conversations, (b) copies of electronic communications (e.g. email, instant messages, text messages, fax, social media messages), and (c) where you are a client, records of face-to-face meetings which may include, without limitation, details of instructions that you have given to us, the date and time of meetings, location of meetings, identity of attendees, initiator of the meetings, and relevant information about your order (including the price, volume, type of order and when it will be transmitted or executed).

The above data will be Processed only where strictly necessary in order to fulfil the purposes set forth in paragraph 4 below, thus guaranteeing the utmost confidentiality and anonymity of such data, specifically in compliance with the principles of proportionality and necessity and, if personal data become no longer relevant to the purposes set forth in paragraph 4, their processing will cease and they shall be deleted and/or anonymised.

## 4. Purposes and legal basis of the processing

The Data Controller may process personal data for the following purposes.

### a) *Compliance with legal obligations*

The Data Controller may process personal data in order to ensure compliance with legal or regulatory obligations, including those provided for by Applicable Regulations, and also by authorities vested with competence from time to time, including:

- Regulation (EU) No 596/2014 on market abuse (“**MAR Regulation**”);
- Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (“**REMIT Regulation**”).



In order to ensure compliance with Applicable Regulations and, specifically, with applicable provisions on the prevention of market abuse, the Data Controller may be required to record and store on a durable medium telephone conversations and electronic communications with the Company, and also to record all relevant information pertaining to “face-to-face” conversations (e.g., date and time of the meeting, location, identity of the participants, details of the order), and – upon request – to transmit such information and/or grant access thereto to competent Authorities and/or Regulated Market Management Companies. You specifically consent to all such recording, storage and transmittal.

The legal basis for such data processing operations is the requirement to comply with legal obligations (Article 6(1)(c) GDPR).

b) *Contractual purposes*

The Data Controller may Process personal data for the management of pre-contractual requests and for the negotiation, commencement and performance of the contractual relationship, as well as the related administrative, fiscal and accounting compliance requirements.

The legal basis for such data Processing is the performance of a contract to which the data subject is party, and/or pre-contractual measures adopted at the data subject’s request (Article 6(1)(b) GDPR).

c) *Legitimate interest pursued by the Data Controller or by a third party*

The Data Controller may process personal data, including recordings of telephone conversations and electronic communications, also in the following cases:

- in order to carry out internal checks/audits aimed to ascertain any illegal/fraudulent conduct and/or breach of obligations that have come to the Data Controller’s attention, in accordance with company regulations and in compliance with the principles of data protection and labour law rules;
- for the Data Controller’s internal control purposes and for the monitoring of corporate risks;
- for the prevention of illegal/fraudulent acts or conduct;
- for management/accounting, internal organisation and cost containment purposes, in the context of the centralisation of functions in specific Eni Group companies;
- to ascertain, exercise or defend a right or interest of the Data Controller or of a third party (including other Eni Group companies) in court and/or out of court;
- for the purposes of special corporate transactions involving the Data Controller (including mergers, acquisitions, transfers, company reorganisations and restructurings).

d) *Marketing*

The Data Controller may process your contact details also for the purpose of transmitting sales communications material (including invitations to events organised by the Data Controller) if, when purchasing a product or service of the Data Controller, you provided your contact details and did not exercise (also thereafter) your right to object to receiving the said



sales communications material, which will in any case be limited to products and services similar to those already purchased (soft-spam).

The legal basis for such data processing operations is the legitimate interest pursued by the Data Controller (Article 6(1)(f) GDPR). At any time Data Subjects can object to being sent sales communications material, and can exercise their right to object by contacting the Data Controller at the addresses indicated in this privacy notice at Paragraph 2 above and/or by following the directions given in the communications received. If data subjects exercise their right to object, they will not be able to receive sales communications material from the Company, but this will have no implications for your relationship with the Company.

e) *Video surveillance*

The Data Controller may also process data that consists of video recordings from the video surveillance system in use in its own facilities and offices.

For a description of such data processing activities, please refer to the dedicated information sheet.

## **5. Nature of the data provision and the consequences of not providing personal data**

Where our collection is based on consent, you can choose not to provide us with personal data. You also have the right to withdraw your consent for us to continue Processing your personal data, by contacting us as outlined in Paragraph 2 above. However, if you do withdraw your consent, it may then not be possible for us to fulfil the purposes for which we require the personal data, for example:

- The provision of personal data for the purposes referred to in paragraph 4(a) and (b) is required to give effect to a legal obligation and/or a contractual obligation, respectively; in the event that personal data is not provided, it will not be possible to enter into and implement the contract and/or to provide the contractual service in question;
- the provision of personal data for the purposes referred to in paragraph 4(c) is required in order to enable the Data Controller to pursue its legitimate interests. Data subjects are entitled to object to data processing operations based on legitimate interest, in accordance with the provisions of paragraph 10 of this privacy notice; however, if data subjects object to the use of such information for the purposes indicated, it may not be possible for the Data Controller to continue to implement the contractual relationship.
- The provision of personal data for the purposes referred to in paragraph 4(d) is optional. In the case of processing based on legitimate interest, data subjects will be able to object at any time to being sent sales communications material. Opposition to the data processing will not affect any contractual relationship entered into and/or to be entered into with the Data Controller.

## **6. Means of the data processing**

Data processing will be carried out using manual and automated means that can guarantee the security and confidentiality of personal data, in both cases ensuring data protection by design





and by default, and subject to the adoption of technical and organisational security measures which – taking into account the state of the art as well as implementation costs, and also the nature, scope, context and purpose of the data processing, and also taking into account risks (of varying probability and severity) to the rights and freedoms of natural persons – are adequate to ensure data security levels commensurate with the relevant risks and, specifically, the prevention and reduction of risks associated with data processing operations arising, in particular, from destruction, loss, alteration, unauthorised disclosure of, or accidental or illegal access to personal data transmitted, stored or otherwise processed. These measures include, among other things: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of data processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a procedure to regularly test, verify and assess the effectiveness of technical and organisational measures to ensure secure data processing operations.

#### **7. Data retention**

Personal data will be processed for a period of time not exceeding the time required in order to fulfil the purposes for which said data were collected and processed in the first place, and for any longer period that proves necessary in order to facilitate compliance with legal obligations and/or to safeguard the relevant rights in court, in compliance with the usual limitation periods.

More specifically, for example, personal data collected and processed in order to facilitate compliance with the special obligations imposed by EU rules mentioned in paragraph 4(a) above, will in any case be stored for at least 5 years.

#### **8. Personal data recipients**

To the extent necessary in order to fulfil the purposes under paragraph 4 above, the Company may communicate personal data to the following categories of recipient:

- persons/entities providing specific legal and/or tax consulting services, banking and/or credit institutions, insurance companies, providers of information systems management and maintenance services, providers of document or electronic or translation archiving services, internal auditors and audit firms;
- companies, entities or associations, or branches/sub-offices, parent companies, subsidiaries or associated companies, or companies subject to joint control with these, as well as consortia, networks of enterprises, groupings and temporary associations of enterprises and those belonging thereto, also in the context of special transactions involving the Data Controller (including mergers, acquisitions, transfers, reorganisations and restructurings);
- persons/entities authorised by law to receive/acquire such data, such as, for example, the EU and Italian Authorities operating in the electricity and gas sector (including, for example, the European Agency for the Cooperation of Energy Regulators (ACER) and the Italian Regulatory Authority for Energy, Networks and the Environment (ARERA)) and other Public Authorities.





These persons/entities will act, as applicable, as independent data controllers (in which case the data communication shall be strictly limited to what is required in order to fulfil the data processing purposes referred to in paragraph 4, and will have the same legal bases as those indicated in paragraph 4), or as data processors, in the latter case based on a specific written agreement on the processing of personal data and following the instructions provided to them by the Data Controller. A detailed and updated list of these persons/entities and their data privacy qualifications may be requested from the Company.

Personal data will also be processed by the Data Controller's personnel as well as by that of the aforementioned persons/entities, based on specific instructions and contractual provisions.

Personal data will not be disclosed, communicated or disseminated.

## **9. International transfer of personal data transfer**

Where necessary in order to fulfil the purposes referred to in paragraph 4 above, personal data may be transferred outside the European Economic Area ("**EEA**") and/or outside Singapore, also by inclusion in databases shared and/or managed by third companies, whether or not they belong to the Eni Group.

Whenever personal data is to be transferred outside the EEA and/or Singapore, and, specifically, to States that do not benefit from a European Commission adequacy decision, the transfer shall take place only (i) after the signature of EU Commission standard contractual clauses or executed agreements between the Company and the recipients of the data, and the adoption by the recipient of technical and organisational measures that can guarantee a level of personal data protection that is adequate or, at least, equal to that guaranteed within the EEA or under the PDPA., or (ii) if European law applies to you, when any one of the conditions referred to in Article 49 GDPR are met.

## **10. Data subjects' rights**

Depending on the jurisdiction that you are in or where we operate, you may enjoy certain rights under applicable law in relation to our Processing your personal data. Listed below are some examples, not all of which may apply to you. Please check back with the Company as to which rights you have under the law applicable to you.

- a. *Right of access* (Article 15 GDPR): the data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, if so, access to the personal data and to the following information: (i) the purposes of the data processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if they are recipients from third countries or international organisations; (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (v) the right to lodge a complaint with a supervisory authority.
- b. *Right to rectification* (Article 16 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data



concerning him/her, and also – taking into account the purposes of the processing – the right to have incomplete personal data supplemented, also by providing a supplementary privacy statement. The data subject is also requested, to this end, to notify the Data Controller (using the contact details indicated in this privacy policy) of any change and/or update to his/her personal data processed in accordance with said privacy policy.

- c. *Right to erasure* (the right “to be forgotten”, Article 17 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning him/her, and the Data Controller shall have the obligation to erase personal data without undue delay if: (i) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) consent to the data processing is revoked and no other legal basis exists permitting the Data Controller to process the data; (iii) the data subject objects to the processing and no legitimate reason exists which can prevail over such opposition; (iv) the personal data have been unlawfully processed; (v) the personal data have to be erased for compliance with a legal obligation; (vi) the data in question are personal data collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

The Company is, however, entitled to reject the request for data erasure if the right to freedom of expression and information prevails, or in order to implement a legal obligation or to defend a right in court, or to pursue a legitimate interest.

- d. *Right to restriction of processing* (Article 18 GDPR): the data subject shall have the right to obtain from the Data Controller restriction of processing in the following cases: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data; (ii) the processing is unlawful; (iii) even if the personal data are not required for data processing purposes, the data subject needs to process said data for the establishment, exercise or defence of legal claims; (iv) for the period of time required in order to verify whether the legitimate grounds of the Data Controller override those concerning the request to restrict the data processing.
- e. *Right to data portability* (Article 20 GDPR): the data subject shall have the right to receive from the Data Controller his/her personal data provided in the context of implementing a contract in a structured, commonly used and machine-readable format e, and also to transmit and/or have the right to transmit those data to another controller without hindrance from the Company;
- f. *Right to object* (Article 21 GDPR): the data subject shall have the right to object, for reasons related to his/her particular situation, at any time to processing of his/her personal data pursuant to Article 6(1)(f) GDPR, including profiling. This is without prejudice to the Data Controller’s entitlement to continue with the data processing operations by demonstrating that good and legitimate reasons exist which prevail over the data subject’s interests, rights and freedoms.



- g. *Right to lodge a complaint with the Italian Data Protection Authority and/or to file court proceedings.*

The rights listed above may be exercised at any time by writing to the following addresses: **data.controller.EGEM@eni.com**; or by writing to the DPO at **dpo@eni.com**. The right to object to the receipt of marketing communications may also be exercised by following the instructions contained in the said communications.

#### **11. Changes and updates to the privacy notice for the processing of personal data and importance of keeping your data updated**

This privacy notice may be amended or updated from time to time. We will communicate any changes and updates by updating this privacy notice published on Eni Global Energy Markets SpA section on our website ([www.eni.com](http://www.eni.com)). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



## SECTION 4 - PRIVACY NOTICE BELGIUM

**Eni Global Energy Markets SpA**, (“**Data Controller**” or also the “**Company**”) in its capacity as data controller for personal data involving persons/entities with whom it has contractual relationships and their point of contacts (“**data subjects**” or “**third parties**”), provides you with this privacy policy on the processing of personal data pursuant to Regulation (EU) 2016/679 (“**GDPR**”), and undertakes to process your personal data in accordance with the GDPR, with the Law of 30 July 2018 on the protection of individuals with regard to the processing of personal data, implementing the GDPR in Belgium (“**Belgian Privacy Code**”), with the relevant provisions and guidelines of Belgian and European data protection and judicial authorities, as well as with applicable domestic and European legislation, including legislation specifically designed for the Company’s reference sector (together, the “**Applicable Regulations**”).

The Data Controller will process your personal data, including the personal data of employees, independent contractors and parties who belong to your organisation and/or who are involved in contractual relationship with the Company, in compliance with the Applicable Regulations and with the confidentiality obligations characterising the Company’s activities.

The Data Controller collects and processes only relevant data, exclusively for the specific purposes of the processing and, accordingly, only data that is required in order to fulfil the purposes set out in this privacy notice: therefore, the Data Controller advises you that unnecessary data should not be communicated or disclosed, and also that third-party data should not be communicated to the Data Controller, unless strictly necessary for the purposes of the processing. If this should occur, the Data Controller reminds you that you need to comply with applicable legislative and regulatory provisions for the protection of personal data and, specifically, to verify that a proper legal basis exists for the data processing operations and to inform the third parties in question that their data are being communicated or disclosed.

In relation to the personal data of your employees, of independent contractors and of persons/entities otherwise involved in the contractual relationship with the Company (e.g., name and surname, company contact details), we remind you that data subjects should be given a copy of this privacy policy in due time and that you are responsible for this notification.

### 1. Identity and contact details of the Data Controller

The Data Controller is Eni Global Energy Markets SpA Belgian Branch, registered with the Belgian Companies’ Registry under no. 0754.605.263 and VAT no. BE0754.605.263, with registered office in Rue Guimard/Guimardstraat, 1A. BE – 1040 Brussels.

Any requests related to the processing of personal data may be sent by mail to the address of the Data Controller Rue Guimard/Guimardstraat, 1A. BE – 1040 Brussels or by email to the following address **data.controller.EGEM@eni.com**.

### 2. Contact details of the Data Protection Officer (“DPO”)

The Company has designated a Data Protection Officer, who may be contacted (together with the Data Controller), for any request related to the processing of personal data, by sending an email to the following address: **dpo@eni.com**.



### 3. Categories of personal data processed

The Data Controller may process the following categories of personal data, which may be provided by and/or collected directly from data subjects (also while the contractual relationship is ongoing and in the context of communications exchanged in implementation thereof) and/or collected from public and/or publicly accessible sources.

More specifically, the data processed may include:

- a) identification data (e.g., name and surname, date of birth, address of residence or domicile, tax code);
- b) contact details (e.g. email address, telephone number);
- c) financial and payment data (e.g. bank account or post office account details);
- d) images collected through video surveillance services;
- e) monitoring and recording of your communications with us which may include (a) recordings of telephone conversations, (b) copies of electronic communications (e.g. email, instant messages, text messages, fax, social media messages), and (c) where you are a third party, records of face-to-face meetings which may include, without limitation, details of instructions that you have given to us, the date and time of meetings, location of meetings, identity of attendees, initiator of the meetings, and relevant information about your order (including the price, volume, type of order and when it will be transmitted or executed).

The above data will be collected and processed only where strictly necessary in order to fulfil the purposes set forth in paragraph 4 below, thus guaranteeing the utmost confidentiality and anonymity of such data, specifically in compliance with the principles of proportionality and necessity and, if personal data become no longer relevant to the purposes set forth in paragraph 4, their processing will cease and they shall be deleted and/or anonymised.

### 4. Purposes and legal basis of the processing

The Data Controller may process personal data for the following purposes.

a) *Compliance with legal obligations*

The Data Controller may process personal data in order to ensure compliance with the obligations provided for by Applicable Regulations and the national implementation thereof, and also by authorities vested with competence from time to time, including:

- Regulation (EU) No 596/2014 on market abuse ("**MAR Regulation**");
- Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency ("**REMIT Regulation**").

In order to ensure compliance with Applicable Regulations and, specifically, with applicable provisions on the prevention of market abuse, the Data Controller may be required to record and store on a durable medium telephone conversations and electronic communications with the Company, and also to record all relevant information pertaining to "face-to-face" conversations (e.g., date and time of the meeting, location, identity of the participants,



details of the order), and – upon request – to transmit such information and/or grant access thereto to competent Authorities and/or Regulated Market Management Companies.

The legal basis for such data processing operations is the requirement to comply with legal obligations (Article 6(1)(c) GDPR).

b) *Contractual purposes*

The Data Controller may process personal data for the management of pre-contractual requests and for the negotiation, commencement and performance of the contractual relationship, as well as the related administrative, fiscal and accounting compliance requirements.

The legal basis for such data processing is the performance of a contract to which the data subject is party, and/or pre-contractual measures adopted at the data subject's request (Article 6(1)(b) GDPR).

c) *Legitimate interest pursued by the Data Controller or by a third party*

The Data Controller may process personal data including recordings of telephone conversations and electronic communications, also in the following cases:

- in order to carry out internal checks/audits aimed to ascertain any illegal/fraudulent conduct and/or breach of obligations that have come to the Data Controller's attention, in accordance with company regulations and in compliance with the principles of data protection and labour law rules;
- for the Data Controller's internal control purposes and for the monitoring of corporate risks;
- for the prevention of illegal/fraudulent acts or conduct;
- for management/accounting, internal organisation and cost containment purposes, in the context of the centralisation of functions in specific Eni Group companies;
- to ascertain, exercise or defend a right or interest of the Data Controller or of a third party (including other Eni Group companies) in court and/or out of court;
- for the purposes of special corporate transactions involving the Data Controller (including mergers, acquisitions, transfers, company reorganisations and restructurings).

If the above activities are not based on the performance of a contract to which the data subject is party, and/or pre-contractual measures adopted at the latter's request (Article 6(1)(b) GDPR - see paragraph 4(b)) and/or to implement a legal obligation (Article 6(1)(c) GDPR - see paragraph 4(a)), they shall be based on the legitimate interest pursued by the Data Controller or by a third party (Article 6(1)(f) GDPR). For further information on the legitimate interest pursued and on the Data Controller's balancing of interests, the Data Controller may be contacted at the addresses indicated in this notice.

d) *Marketing*

The Data Controller may process your contact details also for the purpose of transmitting sales communications material (including invitations to events organised by the Data Controller) if, when purchasing a product or service of the Data Controller, you provided your contact details and did not exercise (also thereafter) your right to object to receiving the said



sales communications material, which will in any case be limited to products and services similar to those already purchased (soft-spam).

The legal basis for such data processing operations is the legitimate interest pursued by the Data Controller (Article 6(1)(f) GDPR). Data subjects can at any time object to being sent sales communications material, and can exercise their right to object by contacting the Data Controller at the addresses indicated in this privacy notice and/or by following the directions given in the communications received. If data subjects exercise their right to object, they will not be able to receive sales communications material from the Company, but this will have no implications for your relationship with the Company.

e) *Video surveillance*

The Data Controller may also process data that consists of video recordings from the video surveillance system in use in its own facilities and offices.

For a description of such data processing activities, please refer to the dedicated information sheet.

## **5. Nature of the data provision and the consequences of not providing personal data**

The provision of personal data for the purposes referred to in paragraph 4(a) and (b) is mandatory, as such data is required to give effect to a legal obligation and/or a contractual obligation, respectively; in the event that personal data is not provided, it will not be possible to enter into and implement the contract and/or to provide the contractual service in question.

The provision of personal data for the purposes referred to in section 4(c) is required in order to enable the Data Controller to pursue its legitimate interests. Data subjects are entitled to object to data processing operations based on legitimate interest, in accordance with the provisions of paragraph 10 of this privacy notice; however, if data subjects object to the use of such information for the purposes indicated, it may not be possible for the Data Controller to continue to implement the contractual relationship.

The provision of personal data for the purposes referred to in section 4(d) is optional. In the case of processing based on legitimate interest, data subjects will be able to object at any time to being sent sales communications material. Opposition to the data processing will not affect any contractual relationship entered into and/or to be entered into with the Data Controller.

## **6. Means of the data processing**

Data processing will be carried out using manual and automated means that can guarantee the security and confidentiality of personal data, in both cases ensuring data protection by design and by default, and subject to the adoption of technical and organisational security measures which – taking into account the state of the art as well as implementation costs, and also the nature, scope, context and purpose of the data processing, and also taking into account risks (of varying probability and severity) to the rights and freedoms of natural persons – are adequate to ensure data security levels commensurate with the relevant risks and, specifically, the prevention and reduction of risks associated with data processing operations arising, in





particular, from destruction, loss, alteration, unauthorised disclosure of, or accidental or illegal access to personal data transmitted, stored or otherwise processed. These measures include, among other things: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of data processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a procedure to regularly test, verify and assess the effectiveness of technical and organisational measures to ensure secure data processing operations.

## **7. Data retention**

Personal data will be processed for a period of time not exceeding the time required in order to fulfil the purposes for which said data were collected and processed in the first place, and for any longer period that proves necessary in order to facilitate compliance with legal obligations and/or to safeguard the relevant rights in court, in compliance with the usual limitation periods.

More specifically, for example, personal data collected and processed in order to facilitate compliance with the special obligations imposed by EU rules mentioned in paragraph 4(a) above, will in any case be stored for at least 5 years.

## **8. Personal data recipients**

To the extent necessary in order to fulfil the purposes under paragraph 4 above, the Company may communicate personal data to the following categories of recipient:

- persons/entities providing specific legal and/or tax consulting services, banking and/or credit institutions, insurance companies, providers of information systems management and maintenance services, providers of document or electronic or translation archiving services, internal auditors and audit firms;
- companies, entities or associations, or branches/sub-offices, parent companies, subsidiaries or associated companies within the meaning of Article 1:14 Belgian Companies and Associations Code, or companies subject to joint control with these, as well as consortia, networks of enterprises, groupings and temporary associations of enterprises and those belonging thereto, also in the context of special transactions involving the Data Controller (including mergers, acquisitions, transfers, reorganisations and restructurings);
- persons/entities authorised by law to receive/acquire such data, such as, for example, the EU and Belgian Authorities operating in the electricity and gas sector (including, for example, the European Agency for the Cooperation of Energy Regulators (ACER), the European Securities and Markets Authority (ESMA) or other (national) regulatory authorities, such as the Financial Services and Markets Authority (FSMA)) and other Public Authorities.

These persons/entities will act, as applicable, as independent data controllers (in which case the data communication shall be strictly limited to what is required in order to fulfil the data processing purposes referred to in paragraph 4, and will have the same legal bases as those indicated in paragraph 4), or as data processors, in the latter case based on a specific written agreement on the processing of personal data and following the instructions provided to them



by the Data Controller. A detailed and updated list of these persons/entities and their data privacy qualifications may be requested from the Company.

Personal data will also be processed by the Data Controller's personnel as well as by that of the aforementioned persons/entities, based on specific instructions and contractual provisions.

Personal data will not be disclosed, communicated or disseminated.

## 9. International transfer of personal data

Where necessary in order to fulfil the purposes referred to in paragraph 4 above, personal data may be transferred outside the European Economic Area ("**EEA**"), also by inclusion in databases shared and/or managed by third companies, whether or not they belong to the Eni Group.

Whenever personal data is to be transferred outside the EEA and, specifically, to States that do not benefit from a European Commission adequacy decision, the transfer shall take place only (i) after the signature of EU Commission standard contractual clauses and the adoption of any additional technical and organisational measures that can guarantee a level of personal data protection that is adequate or, at least, equal to that guaranteed within the EEA, or (ii) if any one of the conditions referred to in Article 49 GDPR are met.

## 10. Data subjects' rights

Data subjects enjoy the rights indicated in Articles 15 *et seq.* of the GDPR (summarised below), where applicable and within the limits identified by applicable legal provisions and, specifically, Articles 36 *et seq.* of the Belgian Privacy Code.

- a. *Right of access* (Article 15 GDPR): the data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, if so, access to the personal data and to the following information: (i) the purposes of the data processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if they are recipients from third countries or international organisations; (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (v) the right to lodge a complaint with a supervisory authority.
- b. *Right to rectification* (Article 16 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning him/her, and also – taking into account the purposes of the processing – the right to have incomplete personal data supplemented, also by providing a supplementary privacy statement. The data subject is also requested, to this end, to notify the Data Controller (using the contact details indicated in this privacy policy) of any change and/or update to his/her personal data processed in accordance with said privacy policy.
- c. *Right to erasure* (the right "to be forgotten", Article 17 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning him/her, and the Data Controller shall have the obligation to erase personal



data without undue delay if: (i) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) the data subject objects to the processing and no legitimate reason exists which can prevail over such opposition; (iv) the personal data have been unlawfully processed; (v) the personal data have to be erased for compliance with a legal obligation; (vi) the data in question are personal data collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

The Company is, however, entitled to reject the request for data erasure if the right to freedom of expression and information prevails, or in order to implement a legal obligation or to defend a right in court, or to pursue a legitimate interest.

- d. *Right to restriction of processing* (Article 18 GDPR): the data subject shall have the right to obtain from the Data Controller restriction of processing in the following cases: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data; (ii) the processing is unlawful; (iii) even if the personal data are not required for data processing purposes, the data subject needs to process said data for the establishment, exercise or defence of legal claims; (iv) for the period of time required in order to verify whether the legitimate grounds of the Data Controller override those concerning the request to restrict the data processing.
- e. *Right to data portability* (Article 20 GDPR): the data subject shall have the right to receive from the Data Controller his/her personal data provided in the context of implementing a contract in a structured, commonly used and machine-readable format e, and also to transmit and/or have the right to transmit those data to another controller without hindrance from the Company;
- f. *Right to object* (Article 21 GDPR): the data subject shall have the right to object, for reasons related to his/her particular situation, at any time to processing of his/her personal data pursuant to Article 6(1)(f) GDPR, including profiling. This is without prejudice to the Data Controller's entitlement to continue with the data processing operations by demonstrating that good and legitimate reasons exist which prevail over the data subject's interests, rights and freedoms.
- g. *Right to lodge a complaint with the Belgian Data Protection Authority and/or to file court proceedings*: contact details of the Belgian Data Protection Authority (Phone: +32 (0)2 274 48 00/35; Email: [contact@apd-gba.be](mailto:contact@apd-gba.be); Website: <https://www.autoriteprotectiondonnees.be/> or <https://www.gegevensbeschermingsautoriteit.be/>; regular mail address: Gegevensbeschermingsautoriteit/Autorité de protection des données, Drukpersstraat 35, 1000 Brussel).

The rights listed above may be exercised at any time by writing to the following addresses: **data.controller.EGEM@eni.com**; or by writing to the DPO at **dpo@eni.com**. The right to



object to the receipt of marketing communications may also be exercised by following the instructions contained in the said communications.

**11. Changes and updates to the privacy notice for the processing of personal data and importance of keeping your data updated**

This privacy notice may be amended or updated from time to time. We will communicate any changes and updates by updating this privacy notice published on Eni Global Energy Markets SpA section on our website ([www.eni.com](http://www.eni.com)). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



## SECTION 5 - PRIVACY NOTICE ITALY

*This English text below is a translation of the Italian text "Informativa sul Trattamento dei Dati Personali Italia" in Section 1. For any conflict or discrepancies between the two texts the Italian text shall prevail.*

**Eni Global Energy Markets SpA** in its capacity as data controller ("**Data Controller**" or also the "**Company**") for personal data involving persons/entities with whom it has contractual relationships and their point of contacts ("**data subjects**" or "**third parties**"), provides you with this privacy policy on the processing of personal data pursuant to Regulation (EU) 2016/679 ("**GDPR**"), and undertakes to process your personal data in accordance with the GDPR, with Legislative Decree No. 196/2003 (as amended) (the "**Italian Privacy Code**"), with the relevant provisions and guidelines of Italian and European data protection and judicial authorities, as well as with applicable domestic and European legislation, including legislation specifically designed for the Company's reference sector (together, the "**Applicable Regulations**").

The Data Controller will process your personal data, including the personal data of employees, independent contractors and parties who belong to your organisation and/or who are involved in contractual relationship with the Company, in compliance with the Applicable Regulations and with the confidentiality obligations characterising the Company's activities.

The Data Controller collects and processes only relevant data, exclusively for the specific purposes of the processing and, accordingly, only data that is required in order to fulfil the purposes set out in this privacy notice: therefore, the Data Controller advises you that unnecessary data should not be communicated or disclosed, and also that third-party data should not be communicated to the Data Controller, unless strictly necessary for the purposes of the processing. If this should occur, the Data Controller reminds you that you need to comply with applicable legislative and regulatory provisions for the protection of personal data and, specifically, to verify that a proper legal basis exists for the data processing operations and to inform the third parties in question that their data are being communicated or disclosed.

In relation to the personal data of your employees, of independent contractors and of persons/entities otherwise involved in the contractual relationship with the Company (e.g., name and surname, company contact details), we remind you that data subjects should be given a copy of this privacy policy in due time.

### 1. Identity and contact details of the Data Controller

The Data Controller is Eni Global Energy Markets SpA, Tax Code, registered with the Roma Companies' Registry under no. 11076280962 and VAT no. 11076280962, with registered office in Piazzale Enrico Mattei 1, 00144 Roma.

Any requests related to the processing of personal data may be sent by mail to the address of the Data Controller Piazzale Enrico Mattei 1, 00144 Roma or by email to the following address **data.controller.EGEM@eni.com**.



## 2. Contact details of the Data Protection Officer (“DPO”)

The Company has designated a Data Protection Officer, who may be contacted (together with the Data Controller), for any request related to the processing of personal data, by sending an email to the following address: **dpo@eni.com**.

## 3. Categories of personal data processed

The Data Controller may process the following categories of personal data, which may be provided by and/or collected directly from data subjects (also while the contractual relationship is ongoing and in the context of communications exchanged in implementation thereof) and/or collected from public and/or publicly accessible sources.

More specifically, the data processed may include:

- a) identification data (e.g., name and surname, date of birth, address of residence or domicile, tax code);
- b) contact details (e.g. email address, telephone numbers);
- c) financial and payment data (e.g. bank account or post office account details);
- d) images collected through video surveillance services;
- e) recordings of electronic communications and telephone conversations with us which may include (a) recordings of telephone conversations, (b) copies of electronic communications (e.g. email, instant messages, text messages, fax, social media messages), and (c) where you are a third parties, records of face-to-face meetings which may include, without limitation, details of instructions that you have given to us, the date and time of meetings, location of meetings, identity of attendees, initiator of the meetings, and relevant information about your order (including the price, volume, type of order and when it will be transmitted or executed).

The above data will be collected and processed only where strictly necessary in order to fulfil the purposes set forth in paragraph 4 below, thus guaranteeing the utmost confidentiality and anonymity of such data, specifically in compliance with the principles of proportionality and necessity and, if personal data become no longer relevant to the purposes set forth in paragraph 4, their processing will cease and they shall be deleted and/or anonymised.

## 4. Purposes and legal basis of the processing

The Data Controller may process personal data for the following purposes.

### a) *Compliance with legal obligations*

The Data Controller may process personal data in order to ensure compliance with the obligations provided for by Applicable Regulations, and also by authorities vested with competence from time to time, including:

- Regulation (EU) No 596/2014 on market abuse (“**MAR Regulation**”);



- Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency ("**REMIT Regulation**").

In order to ensure compliance with Applicable Regulations and, specifically, with applicable provisions on the prevention of market abuse, the Data Controller may be required to record and store on a durable medium telephone conversations and electronic communications with the Company, and also to record all relevant information pertaining to "face-to-face" conversations (e.g., date and time of the meeting, location, identity of the participants, details of the order), and – upon request – to transmit such information and/or grant access thereto to competent Authorities and/or Regulated Market Management Companies.

The legal basis for such data processing operations is the requirement to comply with legal obligations (Article 6(1)(c) GDPR).

b) *Contractual purposes*

The Data Controller may process personal data for the management of pre-contractual requests and for the negotiation, commencement and performance of the contractual relationship, as well as the related administrative, fiscal and accounting compliance requirements.

The legal basis for such data processing is the performance of a contract to which the data subject is party, and/or pre-contractual measures adopted at the data subject's request (Article 6(1)(b) GDPR).

c) *Legitimate interest pursued by the Data Controller or by a third party*

The Data Controller may process personal data, including recordings of telephone conversations and electronic communications, also in the following cases:

- in order to carry out internal checks/audits aimed to ascertain any illegal/fraudulent conduct and/or breach of obligations that have come to the Data Controller's attention, in accordance with company regulations and in compliance with the principles of data protection and labour law rules;
- for the Data Controller's internal control purposes and for the monitoring of corporate risks;
- for the prevention of illegal/fraudulent acts or conduct;
- for management/accounting, internal organisation and cost containment purposes, in the context of the centralisation of functions in specific Eni Group companies;
- to ascertain, exercise or defend a right or interest of the Data Controller or of a third party (including other Eni Group companies) in court and/or out of court;
- for the purposes of special corporate transactions involving the Data Controller (including mergers, acquisitions, transfers, company reorganisations and restructurings).

If the above activities are not based on the performance of a contract to which the data subject is party, and/or pre-contractual measures adopted at the latter's request (Article 6(1)(b) GDPR - see paragraph 4(a)) and/or to implement a legal obligation (Article 6(1)(c) GDPR - see paragraph 4(b)), they shall be based on the legitimate interest pursued by the Data Controller or by a third party (Article 6(1)(f) GDPR). For further information on the





legitimate interest pursued and on the Data Controller's balancing of interests, the Data Controller may be contacted at the addresses indicated in this notice.

d) *Marketing*

The Data Controller may process your contact details also for the purpose of transmitting sales communications material (including invitations to events organised by the Data Controller) if, when purchasing a product or service of the Data Controller, you provided your contact details and did not exercise (also thereafter) your right to object to receiving the said sales communications material, which will in any case be limited to products and services similar to those already purchased (soft-spam).

The legal basis for such data processing operations is the legitimate interest pursued by the Data Controller (Article 6(1)(f) GDPR). Data subjects can at any time object to being sent sales communications material, and can exercise their right to object by contacting the Data Controller at the addresses indicated in this privacy notice and/or by following the directions given in the communications received. If data subjects exercise their right to object, they will not be able to receive sales communications material from the Company, but this will have no implications for your relationship with the Company.

e) *Video surveillance*

The Data Controller may also process data that consists of video recordings from the video surveillance system in use in its own facilities and offices.

For a description of such data processing activities, please refer to the dedicated information sheet.

## **5. Nature of the data provision and the consequences of not providing personal data**

The provision of personal data for the purposes referred to in paragraph 4(a) and (b) is mandatory, as such data is required to give effect to a legal obligation and/or a contractual obligation, respectively; in the event that personal data is not provided, it will not be possible to enter into and implement the contract and/or to provide the contractual service in question.

The provision of personal data for the purposes referred to in section 4(c) is required in order to enable the Data Controller to pursue its legitimate interests. Data subjects are entitled to object to data processing operations based on legitimate interest, in accordance with the provisions of paragraph 10 of this privacy notice; however, if data subjects object to the use of such information for the purposes indicated, it may not be possible for the Data Controller to continue to implement the contractual relationship.

The provision of personal data for the purposes referred to in section 4(d) is optional. In the case of processing based on legitimate interest, data subjects will be able to object at any time to being sent sales communications material. Opposition to the data processing will not affect any contractual relationship entered into and/or to be entered into with the Data Controller.



## **6. Means of the data processing**

Data processing will be carried out using manual and automated means that can guarantee the security and confidentiality of personal data, in both cases ensuring data protection by design and by default, and subject to the adoption of technical and organisational security measures which – taking into account the state of the art as well as implementation costs, and also the nature, scope, context and purpose of the data processing, and also taking into account risks (of varying probability and severity) to the rights and freedoms of natural persons – are adequate to ensure data security levels commensurate with the relevant risks and, specifically, the prevention and reduction of risks associated with data processing operations arising, in particular, from destruction, loss, alteration, unauthorised disclosure of, or accidental or illegal access to personal data transmitted, stored or otherwise processed. These measures include, among other things: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of data processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a procedure to regularly test, verify and assess the effectiveness of technical and organisational measures to ensure secure data processing operations.

## **7. Data retention**

Personal data will be processed for a period of time not exceeding the time required in order to fulfil the purposes for which said data were collected and processed in the first place, and for any longer period that proves necessary in order to facilitate compliance with legal obligations and/or to safeguard the relevant rights in court, in compliance with the usual limitation periods.

More specifically, for example, personal data collected and processed in order to facilitate compliance with the special obligations imposed by EU rules mentioned in paragraph 4(a) above, will in any case be stored for at least 5 years.

## **8. Personal data recipients**

To the extent necessary in order to fulfil the purposes under paragraph 4 above, the Company may communicate personal data to the following categories of recipient:

- persons/entities providing specific legal and/or tax consulting services, banking and/or credit institutions, insurance companies, providers of information systems management and maintenance services, providers of document or electronic or translation archiving services, internal auditors and audit firms;
- companies, entities or associations, or branches/sub-offices, parent companies, subsidiaries or associated companies within the meaning of Article 2359 of the Italian Civil Code, or companies subject to joint control with these, as well as consortia, networks of enterprises, groupings and temporary associations of enterprises and those belonging thereto, also in the context of special transactions involving the Data Controller (including mergers, acquisitions, transfers, reorganisations and restructurings);
- persons/entities authorised by law to receive/acquire such data, such as, for example, the EU and Italian Authorities operating in the electricity and gas sector (including, for example, the European Agency for the Cooperation of Energy Regulators (ACER) and the



Italian Regulatory Authority for Energy, Networks and the Environment (ARERA)) and other Public Authorities.

These persons/entities will act, as applicable, as independent data controllers (in which case the data communication shall be strictly limited to what is required in order to fulfil the data processing purposes referred to in paragraph 4, and will have the same legal bases as those indicated in paragraph 4), or as data processors, in the latter case based on a specific written agreement on the processing of personal data and following the instructions provided to them by the Data Controller. A detailed and updated list of these persons/entities and their data privacy qualifications may be requested from the Company.

Personal data will also be processed by the Data Controller's personnel as well as by that of the aforementioned persons/entities, based on specific instructions and contractual provisions.

Personal data will not be disclosed, communicated or disseminated.

## **9. International transfer of personal data**

Where necessary in order to fulfil the purposes referred to in paragraph 4 above, personal data may be transferred outside the European Economic Area ("**EEA**"), also by inclusion in databases shared and/or managed by third companies, whether or not they belong to the Eni Group.

Whenever personal data is to be transferred outside the EEA and, specifically, to States that do not benefit from a European Commission adequacy decision, the transfer shall take place only (i) after the signature of EU Commission standard contractual clauses and the adoption of any additional technical and organisational measures that can guarantee a level of personal data protection that is adequate or, at least, equal to that guaranteed within the EEA, or (ii) if any one of the conditions referred to in Article 49 GDPR are met.

## **10. Data subjects' rights**

Data subjects enjoy the rights indicated in Articles 15 *et seq.* of the GDPR (summarised below), where applicable and within the limits identified by applicable legal provisions and, specifically, Article 2-undecies of the Italian Privacy Code.

a. *Right of access* (Article 15 GDPR): the data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, if so, access to the personal data and to the following information: (i) the purposes of the data processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if they are recipients from third countries or international organisations; (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (v) the right to lodge a complaint with a supervisory authority.

b. *Right to rectification* (Article 16 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning him/her, and also – taking into account the purposes of the



processing – the right to have incomplete personal data supplemented, also by providing a supplementary privacy statement. The data subject is also requested, to this end, to notify the Data Controller (using the contact details indicated in this privacy policy) of any change and/or update to his/her personal data processed in accordance with said privacy policy.

c. *Right to erasure* (the right “to be forgotten”, Article 17 GDPR): the data subject shall have the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning him/her, and the Data Controller shall have the obligation to erase personal data without undue delay if: (i) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) consent to the data processing is revoked and no other legal basis exists permitting the Data Controller to process the data; (iii) the data subject objects to the processing and no legitimate reason exists which can prevail over such opposition; (iv) the personal data have been unlawfully processed; (v) the personal data have to be erased for compliance with a legal obligation; (vi) the data in question are personal data collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

The Company is, however, entitled to reject the request for data erasure if the right to freedom of expression and information prevails, or in order to implement a legal obligation or to defend a right in court, or to pursue a legitimate interest.

d. *Right to restriction of processing* (Article 18 GDPR): the data subject shall have the right to obtain from the Data Controller restriction of processing in the following cases: (i) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data; (ii) the processing is unlawful; (iii) even if the personal data are not required for data processing purposes, the data subject needs to process said data for the establishment, exercise or defence of legal claims; (iv) for the period of time required in order to verify whether the legitimate grounds of the Data Controller override those concerning the request to restrict the data processing.

e. *Right to data portability* (Article 20 GDPR): the data subject shall have the right to receive from the Data Controller his/her personal data provided in the context of implementing a contract in a structured, commonly used and machine-readable format e, and also to transmit and/or have the right to transmit those data to another controller without hindrance from the Company;

f. *Right to object* (Article 21 GDPR): the data subject shall have the right to object, for reasons related to his/her particular situation, at any time to processing of his/her personal data pursuant to Article 6(1)(f) GDPR, including profiling. This is without prejudice to the Data Controller’s entitlement to continue with the data processing operations by demonstrating that good and legitimate reasons exist which prevail over the data subject’s interests, rights and freedoms.



- g. *Right to lodge a complaint with the Italian Data Protection Authority and/or to file court proceedings.*

The rights listed above may be exercised at any time by writing to the following addresses: Mbx **data.controller.EGEM@eni.com**; or by writing to the DPO at **dpo@eni.com**. The right to object to the receipt of marketing communications may also be exercised by following the instructions contained in the said communications.

#### **11. Changes and updates to the privacy notice for the processing of personal data and importance of keeping your data updated**

This privacy notice may be amended or updated from time to time. We will communicate any changes and updates by updating this privacy notice published on Eni Global Energy Markets SpA section on our website ([www.eni.com](http://www.eni.com)). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.