

PRIVACY INFORMATION NOTICE ACCORDING WITH REGULATION (EU) 2016/679 – GENERAL DATA PROTECTION REGULATION, “GDPR” – WITH REFERENCE TO WHISTLEBLOWING

In accordance with Regulation (EU) 2016/679 (“GDPR”), (the “Company” or the “Data Controller”) sets out below the privacy information notice on the processing of personal data of any whistle-blowers, any reported individual and all other individuals involved in the process of managing Whistleblowing Report – obtained directly by them and/or from third parties - in relation to the activities described in the Annex of the Internal Control and Risk Management System MSG *“Whistleblowing Reports received, including anonymously, by Eni S.p.A and by its subsidiaries in Italy and abroad”* and subsequent updates.

1. Identity of the Data Controller

The Data Controller is Eni S.p.A., with registered office at Piazzale Enrico Mattei 1, 00144 Rome, Italy.

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

The Company has appointed a Data Protection Officer who can be contacted at the following email address DPO@eni.com.

3. The purposes of data processing and its legal basis

a. Legal purposes – data processing is required to comply with the Whistleblowing Reports management as regulated by the Annex of the Internal Control and Risk Management System MSG “Whistleblowing Reports received, including anonymously, by Eni S.p.A. and by its subsidiaries in Italy and abroad”, or with the Data Controller’s legal obligations or with a specific request of the Supervisory Authorities

Your personal data, collected in the context of the Whistleblowing Reports process, will be processed without your consent, as the legal basis is represented by the fulfilment of an obligation deriving from a legal obligation connected to the protection of a relevant public interest, as identified in the Italian Legislative Decree no. 196/2003.

In addition, the personal data collected may be processed to comply with requests from the competent administrative or judicial authority and, more generally, public entities in compliance with the formalities of law.

Eni will process your personal data, directly provided or otherwise collected in the context of the Whistleblowing Reports process, for purposes instrumental and/or associated with the management of Whistleblowing Reports by the Company, according to internal regulation, including assessment activities and internal investigations connected to the verification of the conducts under Whistleblowing Report, disciplinary proceedings to the extent permitted by the rules which are relevant to the employment relationship. As better illustrated in the Annex of

the *Internal Control and Risk Management System MSG "Whistleblowing Reports received, including anonymously, by Eni S.p.A. and by its subsidiaries in Italy and abroad"*, "Whistleblowing Report" must be understood as any communication received by Eni concerning behaviours that relate to Eni's People in violation of (i) the Code of Ethics, (ii) any laws regulations, provisions of authorities, internal regulations, Model 231 or Compliance Models for foreign subsidiaries, that may cause damage or prejudice to Eni, even if only to its public image (hereafter Whistleblowing Report).

Therefore your personal data will be processed as far as you are not making an anonymous report, or are the subject of the report or even falls within the process of managing of Whistleblowing Report, due to its operation. The processing will cover all those operations necessary for:

- the execution of the activity of receiving, analyzing, processing and the storage of the Whistleblowing Report, as well as establishing any disciplinary action or otherwise taking measures and other appropriate actions on a case by case basis,
- for specific needs of Eni's internal control and monitoring of business risks, specifically dictated by law.

The data –the provision of which is necessary and instrumental for the proper management of Whistleblowing Reports – will be processed using electronic instruments, recorded in special data bases and used strictly and exclusively for the purposes indicated.

b. Defence of a legal claim

In addition, your personal data will be processed whenever it is necessary to ascertain, exercise or defend a legal claim or a legitimate interests of the Data Controller or another company within Eni's scope of control, or a third party in every competent Court.

c. Legitimate interests of the Data Controller

The Data Controller may process your personal data without your consent in the following cases:

- in order to carry out internal checks to ascertain the possible commission of illegal acts that the Company may become aware of, also through reporting, in compliance with Company internal regulations and policies and under the principles established by the personal data protection law and labour regulations, as well as the connected internal reporting. In this regard and in compliance with the applicable law and in accordance with the provisions of the company regulatory tools on the allocation and use of ICT resources for personal use, your personal data that may be in the emails contained in the Company mailbox(es) assigned to you, as well as on equipment provided to you by the Company for working purposes, may be processed in order to carry out internal checks in the context of the Whistleblowing Reports process;
- for the prevention of fraud aimed at increase the protection of personal data including through the optimization and efficiency of internal company management and administration processes.

It is understood that only the data collected for the above purposes, where appropriate with respect to these purposes, will be processed in the most aggregated/anonymous form.

Data Controller ensure that your Personal data processing will be performed in compliance with the Relevant Principles on Privacy and Data Protection and, in particular, with the principles of necessity, proportionality, pertinence and not excess, as regulated by the data protection law. In application of the principles mentioned above, Eni, in order to manage the Whistleblowing Reports, generally will choose the least detrimental modalities to the rights of the data subject, by favouring the omission of any personal data in the documents, where the need for investigation can be reached without implying the processing of the personal data.

The processing of the personal data referring to you will be performed "in compliance with the fundamental rights and freedoms as well as the dignity of the Data Subject, with reference to confidentiality, personal identity (...)", including rights to reputation, image, name, to be forgotten, as well as individual's inviolable rights in accordance with Articles 2 and 3 of the Italian Constitution.

4. Types of data processed.

The Company shall process different categories of data, both as directly provided or otherwise collected in the context of the Whistleblowing Reports process. The processing of data may also refer to, in addition to common personal data, special categories of data within the meaning of Article 9 of GDPR (for example information that may reveal "*racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as personal data disclosing health and sex life*" or judicial data or personal data relating to criminal convictions and offences in accordance with Article 10 of GDPR. These data will be used only where strictly necessary in order to manage the Whistleblowing Report, in full compliance with the principles of proportionality and necessity and, if deemed irrelevant to the Whistleblowing Report, they will no longer be subject to further processing.

5. Recipients of personal data

For the purposes indicated in point 3, the Data Controller may disclose the personal data to third parties, such as, for example, those belonging to the following categories:

- police forces, the armed forces and other government bodies, for the fulfilment of the obligations envisaged by law, regulations or EU legislation. In this case, according to applicable data protection legislation, the prior consent of the data subject is not required;
- when involved in the Whistleblowing Report, Control Bodies/Watch structure of Eni S.p.A., variously named, as well as subsidiary or associated companies under Article 2359 of the Italian Civil Code;
- when involved in the Whistleblowing Report, companies, organizations or associations, or parent, subsidiary or associated companies under Article 2359 of the Civil Code, or between these and companies subject to joint control, and between consortia, business networks and

groups, and temporary joint ventures and connected entities, each for its area of responsibility;

- where necessary and in accordance with the principles of proportionality and in a limited manner to the auditing company/external auditors and/or consultants of Eni S.p.A. or Eni subsidiaries and other companies contractually bound to the Data Controller that provide consultancy, service delivery support, etc.

The Data Controller grants that it will take the utmost care to ensure that the communication of your personal data to the above recipients involves only the data required to accomplish the specific purposes for which it is intended.

Your personal data will be processed exclusively by personnel authorized by the Data Controller. These will be given specific instructions on the methods and purposes of the processing.

Finally, please note that your personal data will not be disclosed.

6. Transfer of personal data outside the European Economic Area (EEA)

In the context of the management of Whistleblowing Reports, for some of the purposes indicated in Section 3 above, your personal data may be transferred outside the EEA, including through inclusion in databases shared and managed by third parties both within and outside of Eni's scope of control. The management of the database and the processing of this data are performed only for the purposes for which it was collected and with maximum respect for the privacy and security standards described in applicable personal data protection laws.

Whenever your personal data is transferred outside the EEA, the Data Controller shall take every suitable and necessary contractual measure to guarantee an adequate level of personal data protection in accordance with this Information on the processing of Personal Data, including, among other means, the Standard Contractual Clauses approved by the European Commission.

7. Data retention period

The data will be kept for no longer than required for the purposes for which it has been collected or processed, in accordance with the applicable legislation or in any case to allow Eni the protection of legitimate rights and interests of its own or of third parties.

8. Rights of data subjects

As the data subject, you have, within the limits of legal provision, the following rights concerning the personal data collected and processed by the Data Controller.

a. Right of access

You have the right to ask the Data Controller for confirmation that your personal data is being processed and obtain access to your personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular if

the recipients are in third countries or international organizations; (iv) when possible, the intended retention period of the personal data or, if this is not possible, the criteria used to determine this period; (v) the right to lodge a complaint with a supervisory authority.

It is understood that confidentiality of the informant will always be protected and, unless required by law, the identity of the informant will never be revealed, to prevent direct or indirect retaliation, threats, violence, discrimination etc., against him/her for reasons connected directly or indirectly to the Whistleblowing Report. This principle cannot be guaranteed in case of Illicit Reports (which must be understood as any whistleblowing report, that from the outcome of the preliminary investigation phase, is revealed unfounded based on objective evidence, and that, after the assessment of the circumstances, can be considered the result of bad faith act or serious misconduct).

b. Right of rectification and cancellation

In the cases provided for in applicable law, the data subject can exercise the right to rectify any inaccurate personal data, as well as, taking into account the purposes of the processing, complete any incomplete personal data, including by providing a supplementary statement.

You also have the right to obtain cancellation of your personal data for any of the following reasons: (i) your personal data is no longer required for the purposes for which it was collected or otherwise processed; (ii) the data was processed unlawfully; (iii) you have revoked your consent on the basis of which the Data Controller had the right to process your data and there is no other legal basis allowing the Data Controller to process it; (iv) you did not agree to the processing and there is no overriding legitimate reason to do it; (v) your personal data must be deleted to comply with a legal obligation.

The Company has the right, nevertheless, to waive these rights of cancellation if the right to freedom of expression and information prevails, or to exercise a legal obligation or defend a legal claim.

c) The right to data portability

You have the right to receive the personal data provided to the Company and processed by it on the basis of consent, contract or automated means.

d) The right to restrict processing

You have the right to ask the Company to restrict processing as follows: (i) for the period required by the Data Controller to verify the personal data when the data subject has disputed its accuracy; (ii) if personal data has been processed unlawfully; (iii) even if your personal data is not required for the purposes of processing, the data subject need it to be processed for the determination, exercise or defence of a legal claim; (iv) for the period required to check on the possible prevalence of the Data Controller's legitimate reasons with respect to your opposition to the processing.

Eni reserves the right to limit or delay the exercise of the aforementioned rights, in accordance with the applicable provisions of law where there is a risk that the exercise of the data subject's rights may result in an actual and concrete prejudice to the confidentiality of the identity of the Reporter and that the ability to effectively assess the merits of the Whistleblowing Reporting or to collect the necessary evidence can be compromised.

Under no circumstances will the person reported, or third parties, be able to exercise their rights of access to obtain information on the identity of the whistle-blower, unless the latter has made an Illicit Report.

You can exercise the above mentioned rights by sending an email to the email addresses segnalazioni@eni.com, or whistleblowing@eni.com, or by writing to the data protection officer DPO@eni.com.

You also have the right to file a claim to the competent data protection authority if your data has been processed unlawfully.