



## ENI TRADING AND SHIPPING SPA (“ETS”) PRIVACY POLICY

### INTRODUCTION

This Privacy Policy explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of Website Users, Counterparties, Service Providers and Individuals connected with Counterparties and Service Providers and Other Individuals whose personal data may be processed by ETS. If you are a member of ETS Staff, you should refer to the ETS Staff Privacy Policy which is available at <https://myeni.eni.com/sites/ets/index.html>

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data is ETS (alternatively referred to as "we" or "us").

This Privacy Policy is intended to address the requirements of the GDPR and the Data Protection Act 2018 in the UK.

It is important to point out that we may amend this Privacy Policy from time to time. Please check the ETS website, if you want to stay up to date, as we will post any changes to this Privacy Policy to such resource.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights. We have described these as well where relevant.

### WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

The information described below is in addition to any personal data we are required by law to process in any given situation.

**COUNTERPARTY DATA:** We will collect contact details or the details of individual contacts at your organisation (such as names, telephone numbers, job title and email or postal addresses) in order to ensure our relationship runs smoothly. We may collect date of birth, payment details, tax residence information, copies of photo identifications such as your driving licence and/or passport/identity card, information about nationality/citizenship/place of birth, your national identification number and identity verification documents in order to comply with our legal, regulatory obligations and/or internal policy requirements. We also hold information relating to your online engagement with material published by ETS, which we use to ensure that our marketing communications to you are relevant, timely and in accordance with your marketing preferences. We may also hold extra information that someone in your organisation has chosen to tell us or that you have chosen to tell a Staff member. In certain circumstances, calls with you may be recorded, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know.



To the extent that you access our website we will also collect certain data from you.

**SERVICE PROVIDER DATA:** We will collect your contact details or the details of individual contacts at your organisation (such as names, telephone numbers, job title and email or postal addresses, locations of relevant employees) in order to ensure our relationship runs smoothly. We will also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Staff, our calls with you may be recorded, depending on the applicable local laws and requirements.

To the extent that you access our website we will also collect certain data from you.

**INDIVIDUALS CONNECTED WITH COUNTERPARTIES OR SERVICE PROVIDERS:** We will collect your contact details or the details of individual contacts at your organisation (such as names, telephone numbers, job title and email or postal addresses) in order to ensure our relationship runs smoothly. We will also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us or that you have chosen to tell a Staff member.

To the extent that you access our website we will also collect certain data from you.

**PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS OR STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** To ask for a reference, we need the referee's contact details (such as name, email address and telephone number). We will also need these details if a job applicant or a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.

We will collect your date of birth, postal address and potentially some health information if a member of our Staff has put you down as a dependent for a benefit connected with their employment or if a member of our Staff exercises certain employment rights. We may also be provided with information about your sexual orientation if a member of our Staff identifies you as a spouse or partner when putting you down as a dependent or next of kin.

To the extent that you access our website we will also collect certain data from you.

**WEBSITE USERS** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage our business. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, we will collect any information that you provide to us, for example your name and contact details.



## HOW DO WE COLLECT YOUR PERSONAL DATA?

### COUNTERPARTY DATA

We collect Counterparty personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.

#### Personal data that we receive directly from you

We will receive data directly from you in three ways:

- Where you contact us proactively, usually by phone, fax and/or email or any other form of communication; and/or
- Where we contact you, whether by phone or email or any other form of communication; and/or
- Within contracts that we have negotiated and/or executed with you.

#### Personal data we receive from other sources

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events; and
- From other limited sources and third parties to the extent that they provide us with your details in accordance with any regulatory requirements.

#### Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

### SERVICE PROVIDER DATA

We collect Service Provider personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.



### **Personal data that we receive directly from you**

We will receive data directly from you in three ways:

- Where you contact us proactively, usually by phone, fax and/or email or any other form of communication; and/or
- Where we contact you, whether by phone or email or any other form of communication; and/or
- Within contracts that we have negotiated and/or executed with you.

### **Personal data we receive from other sources**

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including but not limited to:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
- From other limited sources and third parties.

### **Personal data we collect automatically**

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

## **INDIVIDUALS CONNECTED WITH COUNTERPARTY OR SERVICE PROVIDER DATA**

We collect personal data in three primary ways:

1. Personal data that you give to us;
2. Personal data that we receive from other sources; and
3. Personal data that we collect automatically.

### **Personal data you give to us**

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone, fax and/or email or any other form of communication; and/or
- Where we contact you, whether by phone or email or any other form of communication.

### **Personal data we receive from other sources**

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including:



- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events: and
- From other limited sources and third parties.

### Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

**PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDENTS:** We generally only receive your data from third party sources, such as Job Applicants and Staff.

For example, we may receive your personal data if a Job Applicant or Staff member supplied us with your name as an emergency contact, if you were put down by a Job Applicant as a referee, if you were put down by a Staff member as a next of kin or dependent, or if you are involved in any meetings concerning our Staff.

**WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to contract with us. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content.

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Counterparty of ETS, we may use data from your use of our websites to enhance other aspects of our communications with you. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click on [https://www.eni.com/en\\_IT/cookies.page](https://www.eni.com/en_IT/cookies.page)

### HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then put it to good use.

**COUNTERPARTY DATA:** We use Counterparty data for, including, but not limited to

- [Compliance with our contractual or legal obligations and internal policy requirement](#)
- [Trading Activities;](#)
- [Marketing Activities;](#)
- [To help us to establish, exercise or defend legal claims;](#) and



- [Security purposes.](#)

Here are some more details about each:

### **Compliance with our contractual and/or legal obligations and internal policy requirements**

Below are some examples of ways we may use your data in order to comply with our contractual or legal obligations or with a specific request made by you:

- Where it is necessary to fulfil our obligations under civil law, tax law and EU legislation, as well as standards, codes or procedures approved by the relevant authorities;
- To comply with requests from an administrative or judicial authority or other public bodies;
- In connection with the fulfilment of obligations of our contracts and/or the provision of ancillary and/or related services to these contracts;

This data, the provision of which is necessary for implementing the operational, financial and administrative aspects of our activities with you, may be processed using electronic instruments where relevant.

As the communication of your personal data for the above purposes is necessary for the maintenance and performance of obligations related to the contract, failure to do so may result in the specific activity in question being delayed or not performed.

### **Trading Activities**

Below are examples of the various ways in which we use your data in order to ensure the smooth running of our agreements and dealings with you.

- Processing your data in order to carry out anti-money laundering and "Know Your Customer" checks in accordance with our legal and regulatory obligations and/or internal policy requirements;
- Storing your details (and updating them when necessary), so that we can contact you in relation to our relevant activities;
- Keeping records of our conversations and meetings, so that we can manage our business with you and in order to comply with our legal and regulatory obligations;
- Undertaking customer satisfaction surveys; and

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

If you are not happy about this, in certain circumstances you have the right to object.



### Marketing Activities

Subject to any applicable local laws and requirements, we will only send you marketing information when you have consented to receive direct marketing information from us.

Subject to your consent, your personal data may also be processed for the following purposes:

- market research, financial analysis and statistics; and
- interactive commercial communications.

Marketing Activities may involve our products and services or the products and services of other Eni group companies or our commercial partners, and may also be performed through an automated call system without an operator or by email, fax, MMS (Multimedia Message Service) and SMS (Short Message Service).

If you are not happy about this, you have the right to opt out of receiving marketing materials from us.

### To help us to establish, exercise or defend legal claims

In some circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

### Security purposes

If you provide your signature on a tablet, we will be able to process the personal data obtained with an electronic signature for security reasons, only using authorised personnel and those specifically allowed to access the data. We will ensure that the processing is performed exclusively in accordance with procedures established by a rigorous corporate process in cases where the signature requires verification.

This data will then be stored using a process that will maintain its integrity over time and, once you have exchanged any personal data during negotiation process and/or completed the contract process, the documents will be stored in line with our internal retention policy.

Data processing will be performed solely with logics and it will be organised strictly in accordance with the obligations, duties and purposes described in this Policy. In the case of e-signing on tablets, the biometric data obtained will not be used for purposes of identification and authentication.

**SERVICE PROVIDER DATA:** We will use your information for:

- Compliance with and management of the contract;
- Compliance with our legal obligations and internal policy requirements; and
- To help us to establish, exercise or defend legal claims

Here are some more details about each.

### Compliance with and management of the contract



Below are some examples of ways we may use your data for the proper management of our contractual relationship with you:

- To store (and update when necessary) your details, so that we can contact you in relation to our agreements or our dealings with you;
- To obtain support and services from you;
- To perform certain legal and regulatory obligations, such as carrying out anti-money laundering and "Know Your Customer" checks;
- Facilitating our payroll and invoicing processes; and
- To help us to target appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

If you are not happy about this, in certain circumstances you have the right to object.

### **Compliance with our legal obligations**

We may also process your personal data to comply with our legal obligations, including as follows:

- Processing your data where this is necessary to fulfil obligations under applicable law, as well as standards, codes or procedures approved by the relevant authorities;
- Processing your data to comply with requests from an administrative or judicial authority or other public bodies;
- Processing your data for purposes related to our business with you, including to:
  - assess the technical, economic and financial suitability of our business with you, and to verify that your business possesses all prerequisites laid down by applicable legislation for the execution of the contract; and
  - allow any contractual relationship established, if the contract is agreed with you, to be managed correctly in regulatory, technical and economic terms and in compliance with relevant legal obligations.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements.

### **To help us to establish, exercise or defend legal claims**

In some circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.





**INDIVIDUALS CONNECTED WITH COUNTERPARTY OR SERVICE PROVIDER DATA:** We use your information:

- To store (and update when necessary) your details, so that we can contact you in relation to our agreements;
- To obtain support, goods and services from you;
- To perform certain legal obligations;
- To carry out research for the purpose of producing analysis and materials for both internal and external use; and
- In some circumstances, to help us to establish, exercise or defend legal claims.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

**PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDENTS:** We will only use the information about you for the following purposes:

If a Job Applicant or Staff member put you down on our form as an emergency contact, we will contact you in the case of an accident or emergency affecting them; or

If you were put down by a Job Applicant as a referee, we will contact you in order to take up a reference; or

If you were put down by a Staff member as a next of kin or dependent, we will store your personal data to ensure the personnel records of the Staff member are correct and disclose your information to the relevant benefits provider; or

If you are involved in any meetings concerning our Staff.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

If you are not happy about this, you have the right to object.

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent search criteria to help us to present information to you that we think you will be interested in.

If you would like to find out more about cookies, including how we use them and what choices are available to you, please click on [https://www.eni.com/en\\_IT/cookies.page](https://www.eni.com/en_IT/cookies.page).



## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people, including but limited to:

- Any of our group companies;
- Any of our joint venture partners;
- Individuals and organisations who hold information related to Job Applicant's reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, regulatory bodies or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, in connection with any anticipated litigation or in compliance with our legal and regulatory obligations);
- Police forces, the armed forces and other government bodies;
- Third party Service Providers who perform functions on our behalf (including benefit providers such as pension providers, private medical insurance, dental insurance and childcare providers, external consultants, business associates and professional advisers such as lawyers, auditors and accountants, transport and distribution suppliers, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of referees of Job Applicants, we may share your personal data with third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If ETS 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 provide you with notice of this disclosure);
- Insurance companies responsible for the settlement of claims;
- Companies specialising in credit recovery;
- Companies specialising in the management of business information, credit, or advertising and promotion; and



- Other companies, similar to ours, with whom we have agreements of various types.

You may rest assured that we 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 is stored, and will be processed by authorised personnel who will be given specific instructions on the methods and purposes of the processing. Your data will not be communicated to third parties, except as provided for above and, in any case, within the limits indicated.

#### **HOW DO WE SAFEGUARD YOUR PERSONAL DATA?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

#### **HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time after we have parted ways, depending on local law requirements and our legitimate business and risk-management needs. The periods of time for which we retain your data will vary depending on the type of data in question and any overarching legal, regulatory or risk-management requirements to retain it for certain minimum periods. We may, for example, be required to retain certain data for the purposes of tax reporting or responding to tax queries. In other instances, there may be some other legal, regulatory or risk-management requirements to retain data, including where certain data might be relevant to any potential litigation (bearing in mind relevant limitation periods).

In determining the appropriate retention period for various types of personal data, in addition to ensuring that we comply with our legal, regulatory and risk-management obligations, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we need to process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding how long we keep your data for.



## HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply. If your objection relates to us processing your personal data because we deem it necessary for our legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities, you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

**Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. You have the right to ask 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 organisations; (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.



We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.

**Right to erasure:** You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws.

We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to Delete the relevant data.

**Right to restrict processing:** You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your



data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- Where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

**Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you, including by means of providing a supplementary statement. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

**Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your ETS account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.



**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with the Information Commissioner. The relevant contact details are:

- Phone: 0303 123 1113
- Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)
- [Live chat](#).
- Post: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), please contact ***reclami\_privacy\_ETS\_SPA@eni.com***. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You may ask to unsubscribe from direct marketing at any time.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

#### **HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?**

So you want to know more about how we store and transfer your data internationally? In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred to or between, but not limited to:

- Eni group of companies.
- third parties (such as regulatory authorities, advisers or other suppliers to the ETS);
- overseas Counterparties;
- Counterparties within your country who may, in turn, transfer your data internationally; and
- a cloud-based storage provider
- We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:



- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Counterparty of ours); or
- where you have consented to the data transfer.

In the context of the contractual relations between companies within Eni's corporate group, for some purposes set out in the section above entitled "How do we use your personal data?" your personal data may be transferred outside the EU through for example inclusion in databases shared and managed by third parties outside of Eni's control area. 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.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

## COOKIES POLICY

### Summary

When you visit, log in or interact with our web sites, services, apps, tools or messaging systems, we or our authorised service providers may use cookies, web beacons and other similar technologies for advertising purposes and to store information in order to offer you a better, faster and safer user experience.

Our cookies and similar technologies serve various functions. They help our services to run smoothly, allow us to improve performance, provide additional features or enable us to provide you with advertising that is targeted or in-line with your interests. We use cookies and similar technologies that remain on your device only for the period of activity of the browser ("**session cookies**") or for a longer period ("**persistent cookies**"). You can block them, delete them or





disable them if your device allows it. You can manage cookies and cookie preferences in the device or browser settings.

Where possible, security measures are implemented to prevent unauthorised access to cookies and similar technologies. A unique code ensures that only we and/or our authorised service providers can gain access to the data collected by cookies. With regard to your personal data processing in relation to the cookies placed directly by us, the data controller is ETS. With regard to processing in relation to the cookies placed by third parties, each third party is an independent data controller.

Service providers are companies that support us in various aspects of our activities, dealing, for example, with website operations, services, apps, advertising and tools. We use our authorised service providers to offer you advertising in line with your interests on our services and other Internet pages. These service providers may place cookies on your device via our services ("**third party cookies**"). They may also obtain information that allows them to identify your device, such as the IP address or other unique or device codes.

#### **What's a cookie?**

A "cookie" is a piece of information that is stored on your browser or device and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the ETS website.

#### **What are web beacons and similar technologies?**

"Web beacons" are small images, also known as "pixel tags" or "clear GIFs", which we may include in our websites, services, apps, messages and tools. Generally, they work with cookies to identify our users and their activities.

"Similar technologies" are those that store data in the browser or device using objects shared or stored locally, such as flash cookies, HTML 5 cookies and other software methods for web applications. These technologies work in all browsers. In some cases, the use of local storage cannot be fully handled by the browser, but needs to be managed with special tools. We do not use these technologies to store information useful for creating targeted advertising on our or other websites. The terms "cookie" and "similar technologies" can be used interchangeably in this Policy.

#### **How do we use cookies, web beacons and similar technologies?**

We use these technologies to do two things:

- To track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups.



This helps us to develop and improve our website and services in response to what our visitors want and need; and

- To help us advertise jobs, products or services to you that we think you will be interested in. Hopefully this means less time for you trawling through endless pages and will get you to the information you want more quickly.

There are different types of cookies:

- **Session cookies:** these are only stored on your device during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your device;
- **Persistent cookies:** a persistent cookie is stored as a file on your device and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again;
- **Proprietary cookies:** these are cookies placed by the website the user is visiting; or
- **Third-party cookies:** these are cookies placed by a third-party website that is not the site the user is visiting.

The use of these technologies can also be categorised as follows:

- **Strictly necessary from an operational point of view:** The use of cookies, web beacons or other similar technologies may be necessary for the functioning of websites, services, apps and tools. This includes technologies that allow the user to access websites, services, apps and tools to prevent fraudulent activity and improve security, or to use other functions such as shopping carts, saved searches or similar.
- **Performance related:** These technologies enable us to monitor and improve the performance of our site. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality related:** These technologies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These technologies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these technologies collect is usually anonymised.
- **For advertising or content personalisation:** With your consent, we may use, on our sites or on third party sites, our own or third party cookies and web beacons to deliver content, including advertising, relevant to your interests. This



includes the use of technologies to better assess the usefulness of advertising and content presented to you, for example by monitoring whether an advertisement has been selected or not. These technologies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for services that are similar to services that you have previously browsed.

To disable the use of third party cookies and web beacons related to advertising, see the section "Advertising networks and exchanges operated by third parties" below. After disabling proprietary and third party cookies and web beacons related to advertising, as shown below, you can still view our advertising, but it will not be targeted to your interests, as it would be if you were using proprietary or third party cookies and web beacons or related technologies.

If you want to deactivate all other types of technologies used on our websites, services, apps or tools, you can do so by blocking them, deleting them or disabling them on your device or browser.

#### **User choice and the use of cookies, web beacons and similar technologies**

Certain website functions, services, apps and tools are available only through the use of these technologies. You can always block them, delete them or disable them if your browser, installed app or device allows it. However, if you deactivate cookies or other similar technologies, you may not be able to take advantage of certain website features, services, apps or tools. The site may require you to re-enter your password repeatedly during a session. When you initially access our website, and, in any case, until you have made a choice, you can choose to allow or disable the use of cookies. In particular, by clicking on OK or X, you give your consent to the use of cookies. For more information on how to block, delete, or disable these technologies, see your device or browser settings.

In general, these technologies allow our sites, services, apps and tools to store important information in your browser or device, and then use it later to identify you on our servers or internal systems. Where applicable, we protect cookies and other similar technologies to ensure that only we and/or our authorized service providers can interpret them by assigning them a unique code. Your personal data is not stored in cookies or other similar technologies.

All personal information collected and stored through the use of these technologies is obtained only after having notified you and asking for your consent via a positive action. We obtain your consent by informing you clearly of the use of technologies and giving you the opportunity to turn off these features, as mentioned above.

#### **Use of technologies by third party service providers**

We can collaborate with third party companies, generally known as service providers, which are authorised to use cookies, web beacons or similar technologies to store data on our websites or in our services, apps and tools. These service providers allow us to offer you a better, faster and safer experience on our websites.

These service providers may use these technologies to help us provide you with our content and our advertising, and to create anonymous website statistics and analyses. We do not allow



any of our service providers to collect, for their own ends, your personal information on our websites or through our services, apps or tools. These service providers are subject to confidentiality agreements signed with us and other legal limitations concerning the use or collection of any personal information. The use of third party cookies is governed by the privacy policies of these third parties.

Except for the use of these technologies by our service providers or other authorised third parties, our websites do not accept any third party content that includes or uses cookies, web beacons, local storage or similar technologies to monitor or collect your personal information.

#### **Advertising networks and exchanges operated by third parties**

We may use third parties, such as advertising networks and exchanges, to offer you advertising messages. These third party providers of advertising networks and exchanges may use third party cookies, web beacons or similar technologies to collect information. They may also obtain the device identification code, the IP address or the identifier for advertisers ("**IDFA**"). The information obtained by these third parties may be used to allow us to offer you advertising messages in line with your interests on our sites or elsewhere on the web. The use of third party cookies is governed by the privacy policies of these third parties.

For further information on third party cookies related to advertising and how to disable them, go to the following third party websites:

- <http://www.youronlinechoices.eu>
- <http://www.aboutads.info/choices> (available only in English)
- <http://www.networkadvertising.org/choices> (available only in English)

#### **User's rights**

You have the right to obtain confirmation of the existence of your personal data at any time. In particular, you have the right to know the source of your personal data, the purposes and methods of the processing, the logic applied with the help of electronic means and the identification details of the data controller, the data processor or authorised personnel.

You also have the right to update, rectify or integrate your data and to object to processing where there are legitimate reasons.

You may exercise your rights by contacting [data\\_controller\\_delegate\\_ETS\\_SPA@eni.com](mailto:data_controller_delegate_ETS_SPA@eni.com).

### **OUR LEGAL BASES FOR PROCESSING YOUR DATA**

#### **LEGITIMATE INTERESTS**

Article 6(1)(f) of the GDPR says that we can process your data where it "*is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.*"

You have the right to object to us processing your personal data on this basis.



#### **COUNTERPARTY DATA:**

We want to provide you with relevant information which we believe you are interested in. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.

We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests in order to carry out our business activities.

We have to make sure our business runs smoothly, we therefore also need to use your data for our internal administrative activities, such as invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection or tax collection.

In the case of branch mergers, sales or transfers in the future, we may process your personal data to allow the performance of due diligence and other operations prior to the sale. Where possible, the data required for this purpose will be processed anonymously.

#### **SERVICE PROVIDER**

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Service Providers. We also hold your financial details, so that we can pay you for your services.

We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

#### **INDIVIDUALS CONNECTED WITH COUNTERPARTIES OR SERVICE PROVIDERS**

We use and store the personal data of such individuals in order to facilitate our business activities.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

If you have been put down by a Job Applicant or a member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is to be necessary for our legitimate interests as an organisation to ensure we appoint the best applicants to join ETS.

If a Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of our Staff.

If a Staff member has given us your details as a dependent or a next of kin, we will use your personal data as appropriate for the purpose of benefits (e.g. death in service, privacy medical insurance or childcare funding) or employment rights (e.g. maternity or paternity leave or a flexible working request) We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of our Staff.



If a Staff member has requested that you accompany such Staff member to meeting(s) with ETS, we will use your details as appropriate in connection with such meeting(s).

## CONSENT

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*" In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you do not. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- we will keep records of the consents that you have given in this way.

In some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the services we provide as long as you do not actively opt-out from these communications.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time.

## LEGAL OBLIGATIONS

We also have legal and regulatory obligations that we need to comply with. Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "*is necessary for compliance with a legal obligation to which [we] are subject*".

If we believe in good faith that it is necessary, we may share your data in connection with crime detection or tax collection.

We also may share your data with regulatory agencies or other relevant bodies in order to comply with our regulatory obligations.



We will keep records of your personal data (including personal data contained in communications and calls) in accordance with our legal and regulatory obligations.

**ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS**

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "*is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity*".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.



## GLOSSARY

**Counterparties** – include but are not limited to traders, purchasers, sellers, suppliers of commodities and/or energy products and derivatives thereof, shipping companies, storage companies, terminal and pipeline owners and operators, financial institutions, or other business partners in all instances whether legal or natural persons, any ultimate beneficial owners or trust beneficiaries of such entities, any officers or representatives of any such entities, intermediaries, directors, members, shareholders and other beneficial owners of such entities. For the purposes of this policy, regulatory authorities, external bodies, clearing houses and exchanges will be treated as Counterparties.

**Delete** - once your personal data reaches the end of its nominal retention period, or where we receive a valid request from you to erase it, we will put in place specific operational and Systems measures to ensure that your data is "put beyond use". By this we mean that while the data will still technically exist on an archive system, we will ensure that it cannot be accessed by any of our operational Systems, processes or Staff. Only a very small number of senior Staff, in very limited and carefully prescribed situations, be able to restore your personal data so that it can be viewed for those legitimate purposes. Once we are clear that all relevant legally mandated retention periods have expired (which, for present purposes, we expect to be the period of up to nine months, unless we are legally required to hold your personal data for longer than this), we will go the additional final step of undertaking a "hard delete", whereby not even that very limited number of senior Staff would be able to restore your personal data.

**General Data Protection Regulation (GDPR)** – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

**Individuals connected with Counterparties or Service Provider** – includes corporate business contacts, sole traders, staff of Counterparties or Service Providers and any other individual whose personal data may be processed as a result of ETS' contact with Counterparties or Service Provider.

**Job Applicants** - includes applicants for all roles advertised or promoted by ETS, including permanent, part-time and temporary positions and freelance roles with ETS as well as people who have supplied a speculative CV to ETS not in relation to a specific job.

**Other people whose personal data ETS may process** – these may include Staff emergency contacts and next of kin, referees and dependents for the purpose of benefits (e.g. private medical insurance or childcare funding). It also includes referees provided by Job Applicants or individuals who are requested to accompany Staff at meetings with ETS.

**Staff** – includes current and former employees and interns engaged directly in the business of ETS (or who have accepted an offer to be engaged) as well as other workers currently or previously engaged in the business of providing services to ETS (even though they are not classed as employees). Independent contractors and consultants performing services for ETS fall within the definition of a 'Service Provider' for the purposes of this Privacy Policy.





**Service Provider** – refers to partnerships, companies, sole traders, third party service providers (including but not limited to administrators, brokers, agents, transporters and distributors), suppliers and atypical workers such as independent contractors and freelance workers, who provide services to ETS.

**Website Users** - any individual who accesses any ETS website(s).