

# PRIVACY POLICY – PROCESSING YOUR PERSONAL DATA

Pursuant to Regulation (EU) 2016/679 ('GDPR' or the 'Regulation'), Be Power, as the user ('Be Power' or the 'Data Controller'), wishes to provide the following information regarding the processing of personal data of Be Power customers who have registered to use (the 'Registered Users') the loyalty programme called the 'Be Together Initiative' (the 'Programme'). Be Power provides this information pursuant to the provisions of the Regulations and Italian Legislative Decree 196/2003 as amended and/or supplemented ('Italian Privacy Law').

## 1. DATA CONTROLLER

The Data Controller is **Be Power S.p.A.**, with registered office at no. 11 Via Carlo Bo, 20143 Milan (MI), which can be contacted via email at [privacy@bec.energy](mailto:privacy@bec.energy).

## 2. DATA PROTECTION OFFICER - DPO CONTACT DETAILS

Be Power has appointed a Data Protection Officer, who can be contacted at [dpo@eni.com](mailto:dpo@eni.com).

## 3. PURPOSE, LEGAL BASIS FOR PROCESSING, NATURE OF PROVIDING DATA AND STORAGE OF PERSONAL DATA

Your personal data will be processed by Be Power for the following purposes:

- I. **For the purposes of the Programme** and in particular:
  - to allow You to register for and participate in the Programme;
  - to send You emails that are strictly related to the Programme (e.g., to receive discount codes, to provide You with status updates, etc.);



### Be Charge Srl

Registered office: no. 11, Via Carlo Bo, Milan  
Fully paid-up share capital €500,000.00  
VAT no. & Tax reference no. 09957510960  
Registered in the Milan Chamber of Commerce  
and the Milan Economic Administrative Index  
under no. 2124183  
Company with sole shareholder

**Società soggetta all'attività  
di direzione e coordinamento di**



- to manage Your participation in prize draws launched as part of the Programme;
- to allow You to use any prizes (e.g., discounts on our products and/or services and/or those provided by partners, dedicated Initiative products and services, etc.).

The legal basis for processing is to provide You with the services connected with the Programme, as governed by the [Be Together Terms & Conditions](#) and by the rules of any prize draws which may be promoted by Be Power from time to time.

You are not obliged to provide Your data, but to refuse to provide data will mean that You cannot participate in the Programme or in individual prize draws.

Your data will be stored for 10 years from de-registration, pursuant to the terms set out by the applicable regulatory framework on limitations.

**II. To send You email communications with information and offers relating to the Programme (e.g., new prize draws, new prizes available and new Programme partnerships).**

The legal basis for processing is Be Power's legitimate interests in guaranteeing that You are always informed on advantages and new initiatives relating to the Programme.

Your data will be stored until You register an objection to processing.

In any case, You may at any time request to no longer receive these communications (opt-out), by clicking on the appropriate link contained in each communication issued by Be Power.

The request referred to in the previous paragraph will not prevent Be Power from performing marketing activities relating to future initiatives, based on consent provided by You as a Be Power Customer.

**III. Fulfilling obligations set by legislation, regulations and supervisory authority provisions.**

The legal basis for processing is so that Be Power can fulfil its legal obligations as Data Controller and Promoter of the Programme.

**IV. Establishment, exercise or defence of a Be Power right or a third-party right, in particular those for managing complaints, disputes, legal action and/or transactions.**

The legal basis for processing is the legitimate interests of Be Power and/or of third parties relating to the right to defend and protect the rights and interests of Be Power and/or of third parties.

**V. Statistical analysis**

Your personal data will be processed to study aggregate statistics that are relevant to or pertinent to the activities performed by Be Power as part of the Programme.

The legal basis for processing is Be Power's legitimate interests in studying the performance of the Programme, to improve its characteristics based on user interactions.

#### **4. SCOPE OF COMMUNICATION AND RECIPIENTS OF PERSONAL DATA**

Your personal data will be processed, for the above reasons, by staff within Be Power who are expressly authorised and trained to process personal data. Your personal data may also be communicated for the above reasons to the following entities:

- entities that perform services on behalf of Be Power, appointed Data Processors (e.g., ICT service providers or providers of services as part of the Programme);
- public-sector or private-sector entities (e.g., insurance companies, banks, legal consultants, public authorities, law enforcement agencies, tax agencies), which will process them as autonomous Data Controllers.

#### **5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION**

If it is deemed instrumental to the pursuit of the purposes indicated in section 3, Your personal data may also be transferred abroad to a company with offices outside the European Union. Some of these jurisdictions may not guarantee the same level of data protection guaranteed by the country in which a data subject resides. In this case, Be Power undertakes that personal data will be processed with the utmost confidentiality. Where necessary, Be Power will conclude agreements which guarantee a suitable level of protection and/or will adopt standard contractual clauses set out by the European Commission.

#### **6. YOUR RIGHTS AS A DATA SUBJECT**

Pursuant to the Regulation and in the cases set out in it, You may exercise Your rights as referred to in Articles 15 et seq. of GDPR. In particular, You have:

- **the right of access:** the right to obtain from the Data Controller confirmation as to whether or not personal data concerning You are being processed, and, where that is the case, access to information regarding processing;
- **the right to rectification:** to ask the Data Controller to rectify inaccurate personal data concerning You;
- **the right to erasure:** to ask the Data Controller to erase data concerning You;
- **the right to restrict processing:** to ask the Data Controller to restrict processing of data concerning You;
- **the right to data portability:** to ask the Data Controller to receive the personal data concerning You, in a commonly used and machine-readable format, or to transmit those data to another Data Controller, where technically feasible;
- **the right to object:** You also have the right to object in whole or in part, for legitimate reasons and in the cases set out in GDPR, to the processing of data concerning You.
- Finally, if You believe that the processing of data provided by You violates personal data protection legislation, You have the right to lodge a complaint with Autorità Garante [Italian Data Protection Authority] (information on this matter is available at [www.garanteprivacy.it](http://www.garanteprivacy.it)).

You may exercise the rights listed above by:

- sending an email to [privacy@bec.energy](mailto:privacy@bec.energy);
- contacting Customer Services on +39 0287119401 or at [servizioclienti@bec.energy](mailto:servizioclienti@bec.energy); or
- by contacting the DPO.