

INFORMATION NOTE ON THE PROCESSING OF PERSONAL DATA OF PLENITUDE ON THE ROAD S.R.L. CUSTOMERS PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Pursuant to Regulation (EU) 2016/679 ("GDPR" or "Regulation"), Plenitude On The Road S.r.l. ("Company" or the "Data Controller") provides the following information note regarding the processing of personal data of customers ("Customers") carried out as part of the provision of services by Plenitude On The Road in favour of the Customer.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller of personal data is Plenitude On The Road S.r.l., with registered office in via Carlo Bo no. 11, 20143 Milan (MI) who can be contacted at the following email address: privacy@service.emob.eniplenitude.com.

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DATA PROTECTION OFFICER - DPO)

The Company has designated a Data Protection Officer, who can be contacted at the following email address: dpo@eniplenitude.com.

3. PURPOSE, LEGAL BASIS OF THE PROCESSING, NATURE OF THE PROVISION OF DATA AND STORAGE OF PERSONAL DATA

The Company will process personal data for the following purposes:

1) Performance of contractual obligations and in particular:

- **management of the contractual relationship** and of the related activities (for example, management of invoicing and payments, requests for assistance, complaints, etc.).

The legal basis of the processing is the performance of the contract and of endo-contractual activities (art. 6, par. 1, letter b) GDPR).

The provision of data is necessary and in the absence of this, it will not be possible to stipulate or correctly execute the contract.

The data will be stored for 10 years from the termination of the contractual relationship.

2) Fulfilment of legal obligations, regulations, provisions of Authorities legitimated by law

The legal basis of the processing is the fulfilment of the legal obligations to which Plenitude On The Road is subject (art. 6, par. 1, letter c) GDPR).

The data will be kept within the limits imposed by law.

3) **Assessment, exercise or defence of a right** of the Data Controller or of third parties and in particular:

- **debt management and recovery** operations;
- preparatory activities for, and in the context of, any corporate transactions (for example, due diligence, merger, demerger, acquisition, transfer of assets and/or business units, etc.);
- **management of the pre-litigation and litigation phase**, including any mediation and conciliation activities prior to the arbitration.

The legal basis of the processing is the legitimate interest of Plenitude On The Road and/or of third parties related to the right of defence and protection of rights and/or interests of the Company and/or of third parties (art. 6, par. 1, letter f) GDPR).

The data will be kept for the time necessary to protect the rights and/or interests of Plenitude On The Road and/or third parties in compliance with the ordinary limitation periods.

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

The processing of personal data will be carried out, for the purposes indicated in point 3, by the internal staff of the Data Controller, expressly authorised to process personal data. In addition, personal data may be disclosed for the purposes outlined to the following entities or categories of entities:

- **subjects that perform services on behalf of Plenitude On The Road**, as data controllers (for example, suppliers of IT services or commercial support services);
- **public or private entities** (for example, insurance companies, banks, legal advisors, public authorities, judicial bodies, revenue agencies), who will process them as independent data controllers.

The Customer's personal data will not be disclosed.

5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

The Customer's personal data will not be transferred to third party companies in countries outside the European Union or the European Economic Area.

Where such transfer is necessary for any of the purposes mentioned above, the Data Controller will take all appropriate and necessary contractual measures to ensure an adequate level of protection of personal data (for example, Standard Contractual Clauses, adequacy decisions).

6. RIGHTS OF THE DATA SUBJECT

Pursuant to the Regulation and in the cases provided for by the Regulation, the Customer may exercise the rights referred to in Articles 15 et seq. of the GDPR and in particular:

- **right of access:** ask the Data Controller for confirmation that the data processing is in progress and, in this case, ask the Data Controller for access to information relating to the processing;
- **right to rectification:** ask the Data Controller to rectify inaccurate or incomplete data;
- **right to erasure:** ask the Data Controller to erase the data;
- **right to restriction of processing:** ask the Data Controller to restrict the processing;
- **right to data portability:** request the Data Controller to receive, in a commonly used and machine-readable format, the data concerning them or to obtain direct transmission to another data controller, where technically feasible;
- **right to object:** to oppose, in whole or in part, for legitimate reasons and in the cases provided for by the GDPR, the processing of data concerning them.

Without prejudice to any other administrative or judicial remedy, the data subject who considers that the processing concerning him/her violates the GDPR has the right to lodge a complaint with the supervisory authority of the Member State in which he/she usually resides or works, or of the State in which the alleged violation occurred.

The Customer may exercise the rights listed above:

- by sending an email to the email address:
privacy@service.emob.eniplenitude.com;
- by contacting the DPO at the following address: dpo@eniplenitude.com.