

Information Pursuant to Article 13 of Regulation (EU) 2016/679 on the Processing of Personal Data of Payment Card Holders Used on POS Installed at Plenitude On The Road S.r.l. Charging Stations

Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR"), Plenitude On The Road S.r.l., as the data controller, provides this information regarding the processing of personal data carried out in the context of managing payments by payment card holders used on POS installed at Plenitude On The Road S.r.l. charging stations. Specifically, this information is addressed to:

- a) non-registered users of electric mobility applications who use the charging service provided by the station and pay with a payment card on the POS ("Non-Registered User");
and
- b) registered users of electric mobility applications who use the charging service provided by the station and pay with a payment card directly via POS ("Registered User").

(collectively, "Users")

1. Data Controller

The data controller is Plenitude On The Road S.r.l. ("Company," or "Controller"), with registered office at Via Carlo Bo 11, 20143 Milan (MI), VAT no. 09957510960, and can be contacted via email at: privacy@service.emob.eniplenitude.com.

2. Data Protection Officer (DPO)

The DPO can be contacted at the following email address: dpo@eniplenitude.com.

3. Characteristics of Personal Data Processing

Users' personal data will be processed for the following purposes:

- A. Provision of the charging service;
- B. Compliance with legal obligations;
- C. Exercise or defense of a right by Plenitude On The Road S.r.l. or third parties.

A. Provision of the charging service

Plenitude On The Road S.r.l. will process Users' data to ensure:

- i. the provision of the charging service;
- ii. payment processing;
- iii. payment execution through the issuance, where required, of an invoice.

The legal basis is the execution of the payment management service for Users (Art. 6(1)(b) GDPR).

Providing the data is necessary. Without providing it, it will not be possible to use the charging service.

Personal data will be retained for 10 years from the closure of the charging operation performed by the User, except when it is necessary to retain the data for a longer period for defense in legal proceedings or for pre-litigation/settlement activities.

B. Compliance with legal obligations

Plenitude On The Road S.r.l. will process Users' data to comply with legal obligations, regulations, and provisions of authorities authorized by law.

The legal basis is compliance with the legal obligations to which Plenitude On The Road S.r.l. is subject (Art. 6(1)(c) GDPR).

C. Exercise or defense of a right by Plenitude On The Road S.r.l. or third parties

Plenitude On The Road S.r.l. will process Users' data for the exercise or defense of a right by Plenitude On The Road S.r.l. or third parties (e.g., for handling complaints or managing disputes or pre-litigation activities).

The legal basis is the legitimate interest of Plenitude On The Road S.r.l. and/or third parties to exercise the right of defense and protection of Plenitude On The Road S.r.l.'s and/or third parties' rights and/or interests (Art. 6(1)(f) GDPR).

Personal data will be retained for the period strictly limited to the duration of the dispute, until the expiry of the terms for appeal actions, and after 10 years from the end of the dispute or from the final decision of the judicial authority.

4. Scope of Communication and Recipients of Personal Data

Personal data will be processed exclusively by authorized personnel, who will be provided with specific instructions on the methods and purposes of processing. Personal data may be communicated by the Controller to the following categories of recipients, exclusively for the purposes indicated above:

- entities providing payment services, which will process them as independent data controllers;
- entities providing services on behalf of Plenitude On The Road S.r.l., such as data processors (e.g., IT service providers);
- public or private entities (e.g., insurance companies, banks, legal advisors, public authorities, judicial bodies, tax agencies), which will process them as independent data controllers.

Personal data will not be disseminated.

5. Transfer of Data Outside the European Union

Your personal data will not be transferred outside the European Union.

6. Rights of the Data Subject

Pursuant to Articles 15-22 GDPR, Users, as data subjects, can exercise the following rights:

- a) **Right of access:** right to obtain confirmation from the Controller as to whether or not personal data concerning them is being processed and, if so, to access the personal data and further information on the origin, purposes, category of data processed, recipients of communication and/or transfer of the data, etc.;
- b) **Right to rectification:** right to obtain from the Controller the rectification of inaccurate personal data without undue delay, as well as the completion of incomplete personal data, including by providing a supplementary statement;
- c) **Right to erasure:** right to obtain from the Controller the erasure of personal data without undue delay where the personal data is no longer necessary in relation to the purposes for which it was collected; the consent on which the processing is based is withdrawn and there is no other legal ground for the processing; the personal data has been unlawfully processed; or the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the Controller is subject;
- d) **Right to object to processing:** right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them under Article 6(1)(e) or (f) GDPR, including profiling based on those provisions;
- e) **Right to restriction of processing:** right to obtain from the Controller the restriction of processing where the accuracy of the personal data is contested (for the period necessary for the Controller to verify the accuracy of such personal data), if the processing is unlawful and/or the data subject has objected to the processing;
- f) **Right to data portability:** right to receive in a structured, commonly used and machine-readable format the personal data and to transmit those data to another data controller, only in cases where the processing is based on consent and only for data processed by electronic means.

The above rights can be exercised by writing an email to privacy@service.emob.eniplenitude.com or to the DPO's email at dpo@eniplenitude.com.

Without prejudice to any other administrative or judicial remedy, the data subject who considers that the processing concerning them violates the GDPR has the right to lodge a complaint with the supervisory authority of the Member State where