

## **PROCESSING OF PERSONAL DATA OF POTENTIAL BUSINESS CUSTOMERS INTERESTED IN BEING CONTACTED BY PLENITUDE ON THE ROAD S.R.L. – PRIVACY POLICY**

Pursuant to Regulation (EU) 2016/679 (“**GDPR**” or “**Regulation**”) Plenitude On The Road S.r.l. (“**Plenitude On The Road**”) provides below the information note regarding the processing of personal data of potential business customers (“**Potential Business Customers**”).

In particular, this information note is addressed to any potential business customer, including in the person of its legal representative or delegate, who sends a request for information and contact back to Plenitude On The Road through the following methods:

- a) filling in one of the contact forms dedicated to electric mobility on the Eni Plenitude S.p.A. Società Benefit website (“**Website**”) or on third-party provider websites (for example, Google, LinkedIn, Meta) or set up during digital events and webinars or offline events/fairs;
- b) by contacting Plenitude On The Road customer care by email or by telephone using the contact details on the Website or through the Plenitude On The Road application;
- c) by directly contacting via email the Plenitude On The Road personnel responsible for sales activities or any other activity that may involve receiving expressions of interest from Potential Business Customers.

### **1. DATA CONTROLLER**

The data controller is Plenitude On The Road S.r.l., with registered office in Via Carlo Bo 11, 20143 Milan (MI), which can be contacted at the email address: [privacy@service.emob.eniplenitude.com](mailto:privacy@service.emob.eniplenitude.com).

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

Plenitude On The Road has appointed a Data Protection Officer, who can be contacted at the following email address: [dpo@eniplenitude.com](mailto:dpo@eniplenitude.com).

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

The personal data of Potential Business Customers will be processed by Plenitude On The Road for the following purposes:

- I. **Management of requests for information and contact sent by the Potential Business Customer**

The personal data of the Potential Business Customer will be processed by the Data

Controller to allow the correct management of requests for information and contact sent through the methods indicated above.

The legal basis of the processing is the performance of the pre-contractual measures adopted at the request of the Potential Business Customer (art. 6, par. 1, letter b) GDPR) and therefore to ensure that the Potential Business Customer receives feedback from Plenitude On The Road to their requests for information and for further contact.

The provision of data is mandatory; therefore, failure to provide it will prevent Plenitude On The Road from processing requests for information and contact.

The personal data of the Potential Business Customer provided by sending requests for information and recontact will be retained:

- a) in the case of requests for information, including those that have generated an offer (not accepted or left unfulfilled), for the time necessary to respond to the request and for one year from fulfilling the request for information and re-contacting the Potential Business Customer;
- b) in the case of assistance requests and complaints/reports, for 5 years from the last interaction with the Potential Business Customer, in order to allow Plenitude On The Road to defend itself against possible claims made in relation to the services offered by Plenitude On The Road.

## **II. Assessment, exercise or defence of a right of Plenitude On The Road or of third parties and corporate transactions**

The personal data of the Potential Business Customer will be processed by the Data Controller:

- a) for the purposes of verifying, exercising or defending a right of Plenitude On The Road or of third parties (for example, for the management of legal disputes and/or transactions);
- b) for the performance of 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.);
- c) for the management of any complaints and/or disputes.

The legal basis for this processing is the legitimate interest of the Data Controller and/or of third parties to exercise the right to defend and protect the rights and/or interests of Plenitude On The Road and/or of third parties and to carry out any corporate transactions (art. 6, par. 1, letter f) GDPR).

The personal data of the Potential Business Customer will be retained for as long as necessary to protect the rights and/or interests of Plenitude On The Road and/or of third parties, and to carry out any corporate operations. In any case, they will be deleted one year after the request has been processed.

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

The processing of personal data will be carried out, for the purposes described above, by Plenitude On The Road's internal staff, expressly authorised and instructed in the processing of personal data.

Personal data may also be disclosed for the purposes outlined to the following entities:

- a. subjects who perform services on behalf of Plenitude On The Road, appointed data processors (for example, IT service providers);
- b. public or private subjects (for example, legal advisors, public authorities, judicial bodies), who will treat them as independent data controllers.

The personal data of the Potential Business Customer will not be disclosed.

#### **5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")**

The personal data of the Potential Business Customer will be transferred outside the European Economic Area, in particular the data will be stored on the servers of the provider HubSpot, Inc., based in the United States, which has adhered to the Data Privacy Framework.

#### **6. RIGHTS OF THE DATA SUBJECT**

Pursuant to the Regulation and in the cases provided for by the Regulation, Potential Business Customers 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 as to whether or not data processing is in progress and, where that is the case, ask the Data Controller for access to information relating to the processing itself;
- **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:** ask 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.

Potential Business Customers may exercise the rights listed above:

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