

Dear Mr./Mrs.,

Immergas S.p.A. recognizes the importance of the protection and safeguarding of personal data and undertakes to process them in accordance with the principles of lawfulness, correctness and transparency in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the "Regulation").

Immergas S.p.A. (hereinafter "Immergas"), as Data Controller, hereby provides you with the following information, pursuant to and in accordance with Article 13 of the Regulation, regarding the processing of personal data communicated by you or acquired by Immergas in order to guarantee you the Pre-Sales Consulting Service and the activities related thereto.

#### **1. DATA CONTROLLER**

The Data Controller of your personal data is the company Immergas S.p.A. with registered office in Brescello - Via Cisa Ligure, 95 - 42041 Reggio Emilia (ITALY), C.F. / P.IVA 00932830359 (hereinafter "DATA CONTROLLER" or "IMMERGAS").

#### **2. TYPES OF PERSONAL DATA PROCESSED**

The Data Controller collects and processes the personal data of those who make the request of Consulting Service (such as, for example: first name, last name, address of residence, e-mail address and telephone contacts, information regarding the plant situation and housing type from which personal data can be inferred, or in relation to which they are communicated) that are communicated to it or that are otherwise acquired, within the limits of the provisions of Article 14, paragraph 5, of the Regulation, in the context of pre-contractual and contractual relations.

#### **3. PURPOSE AND LEGAL BASIS OF PROCESSING**

The processing having as object the personal data referred to in point 2 may have the following purposes:

- 3.1 performance of a contract to which the Data Subject is a party and/or execution of pre-contractual measures taken at the request of the same (Article 6, par. 1, letter b of the Regulation);
- 3.2 fulfillment of legal and tax obligations to which the Data Controller is subject; compliance with sector regulations (Article 6, par. 1, letters b and c of the Regulation);
- 3.3 exercise and defense of the rights of the Data Controller in the appropriate judicial and administrative forums (Article 6, par. 1, letter f of the Regulation).

Within the limits of the above purposes, according to the provisions of Article 6, par. 1, letters b), c) and f) of the Regulation, consent to the processing of personal data is not required.

#### **4. NATURE OF THE PROVISION OF DATA AND CONSEQUENCE OF THE REFUSAL TO PROVIDE PERSONAL DATA**

The provision of personal data is compulsory as such data is indispensable for the Data Controller to achieve the purposes set out in point 3. Any refusal, in whole or in part, to provide personal data, or an inaccurate or untrue provision, will result in the impossibility for the Controller to process the data for the aforementioned purposes and thus to fully and correctly execute the pre-contractual and/or contractual agreements entered into.

#### **5. MODALITIES OF THE PROCESSING OF PERSONAL DATA**

The processing of personal data may involve all the operations indicated in Article 4, paragraph 2 of the Regulation. In any case, the principles applicable to data processing established in Article 5 of the Regulation themselves will be respected. The processing of personal data will be carried out with the aid of computerized means. Personal data may be stored in paper and/or electronic files.

Personal data will be processed in a manner that guarantees their security and confidentiality, through the adoption of appropriate measures to prevent their alteration, deletion, destruction, unauthorized access or processing that is not permitted or does not conform to the purposes of collection.

Personal data will not be processed by the Data Controller through automated systems or decision-making processes, including profiling, where profiling is defined as any form of automated processing of personal data aimed at analyzing or predicting certain personal aspects including, but not limited to, aspects concerning professional performance, economic situation, personal preferences, interests, or behavior.

#### **6. TO WHICH SUBJECTS YOUR PERSONAL DATA MAY BE COMMUNICATED AND WHO CAN GET TO KNOW THEM**

Within the organizational structure of the Data Controller, individuals expressly authorized by the Data Controller may have access to personal data, within the limits and in the manner set forth in their respective assignments and exclusively for the pursuit of the purposes stated above.

The processing of personal data may be entrusted by the Data Controller to third parties who carry out on behalf of the Data Controller specific activities related to the purposes set out in point 3 who, due to their experience, capacity and reliability, guarantee full compliance with the current provisions on data processing and protection, including the security profile and who will be, in this case, appointed as Data Processors in accordance with the provisions of Article 28 of the Regulation. The list of individuals appointed as External Processors with respect to your Request for Consultation and/or your Contract is available upon request from the Data Controller.

Personal data may also be communicated to third parties, operating as autonomous Data Controllers (such as Control and Supervisory Authorities) if they are entitled to request the data.

## 7. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

Personal data will not be subject to transfer by the Controller to Third Countries or to International Organizations outside the European Union if the safeguard mechanisms provided in CHAPTER V, Articles 44 et seq. of the Regulation have not been adopted or are not in force.

## 8. PERSONAL DATA RETENTION PERIOD

Personal data will be processed by the Data Controller for the time strictly necessary to achieve the purposes referred to in Section 3. Once the retention periods relating to each purpose have elapsed, the personal data will be destroyed or anonymized and, in any case, will be rendered unusable for the purpose with respect to which the periods have elapsed.

## 9. DATA SUBJECT'S RIGHTS

In relation to the processing operations described in this Policy you may, under the conditions provided for in the Regulation, exercise the rights set out below by contacting the Data Controller:

- by registered mail with return receipt: Immergas S.p.A., Via Cisa Ligure, 95 - 42041 Brescello (R.E.) - ITALY
- by e-mail: [privacy@immergas.com](mailto:privacy@immergas.com)
- by certified e-mail: [immergas@legalmail.it](mailto:immergas@legalmail.it)

**art. 15 Right of access:** the data subject shall have the right to obtain from the data controller confirmation as to whether or not personal data concerning him or her are being processed and, if so, to obtain access to the personal data. At the request of the data subject, the data controller shall provide the data subject with a copy of the personal data being processed.

**art. 16 Right of rectification:** the data subject has the right to obtain from the data controller, without undue delay, the rectification of inaccurate personal data concerning him/her and, therefore, the integration of incomplete personal data.

**art. 17 Right to erasure (so-called "Right to be forgotten"):** the data subject has the right to obtain the erasure of personal data concerning him/her without undue delay, and the data controller has the obligation to erase without undue delay the personal data for the reasons and within the limits of the provisions.

**art. 18 Right to limitation of processing:** the data subject has the right to obtain from the data controller a limitation of the processing of his or her data in the cases provided for in Article 18 of the Regulation.

**art. 19 Obligation to notify in the event of rectification or erasure of personal data or restriction of processing:** in the event of the exercise of the right to rectification, erasure and restriction, the controller shall notify each of the recipients to whom the personal data have been transmitted of any rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. The data controller shall inform the data subject of such recipients if the data subject so requests.

**art. 20 Right to data portability:** the data subject has the right to receive the personal data concerning him or her, which he or she has provided to a data controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, if the processing is based on consent or a contract or if the processing is carried out by automated means.

**art. 21 Right to object:** the data subject has the right to object at any time, for reasons related to his / her particular situation, to the processing of personal data concerning him / her. The data controller shall no longer process the personal data unless demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

**art. 22 Automated individual decision-making, including profiling:** the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The exercise of your rights as a data subject is free of charge, pursuant to Article 12 of the Regulation. However, in the case of requests that are manifestly unfounded or excessive, including because of their repetitiveness, the Data Controller may charge a reasonable expense contribution in light of the administrative costs incurred in handling your request, or deny satisfaction of the request by recurring.

Pursuant to Article 13.2 letter d) of the Regulation, we inform you that, as a data subject, you have the right to lodge a complaint with the Data Protection Authority by following the procedures and directions published on the Authority's website ([www.garanteprivacy.it](http://www.garanteprivacy.it)) if you believe that your personal data have been processed in violation of the data protection regulations.

The Data Controller

Immergas S.p.A.