

PRIVACY POLICY

Pursuant to Art. 13 and 14 of EU Regulation 2016/719 (hereinafter also “**GDPR**”), Acea Innovation S.r.l. (hereinafter also, “**Acea Innovation**”), the Data Controller, hereby discloses its policy regarding the use of personal data (hereinafter “**Data**”) deliberately released on its website www.aceainnovation.it (hereinafter also the “**Site**”) by visitors for the purpose of requesting consulting services and/or further information regarding the electric mobility products, energy efficiency services and home composting solutions sold by Acea Innovation.

Data processing shall be carried out in full compliance with the GDPR, and all national implementing laws such as Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, Recommendation No. 2/2001 on minimum requirements for on-line data collection in the European Union, and any further rule and provision issued by the National Authority for the protection of personal data (hereinafter, collectively “**Privacy Rules**”).

1. Data Controller

Acea Innovation S.r.l., whose legal offices are located in Piazzale Ostiense No. 2, 00154 – Rome, is the Data Controller for all personal data released by visitors of the Site.

In order to supply the consulting services requested by Site visitors, Acea Innovation may use Third Parties who will have a contractual relationship to act on its behalf as Data Processors, in accordance with the provisions of Art. 28 of the GDPR. Data may also be communicated to persons who will act as "authorized persons".

No Data will be subject to disclosure.

2. Purposes and legal basis for processing

As Data Controller, Acea Innovation processes data deliberately released by Site visitors for the following purposes:

1. purposes strictly connected with managing the information and/or assistance requested by the visitor;
2. pre-contractual requirements and/or requirements to complete the purchase of the services and/or products marketed through the Site by Acea Innovation.

Data collection is compulsory for the purposes listed above, that is, regarding a pre-contractual or contractual stage, or connected to a request of the Data subjects, and the Data Controller will not be able to fulfill said Data subjects' requests without it.

3. Processed Data

Acea Innovation shall process the following types of data deliberately released by Data subjects when browsing the site:

- a) Contact data: name, surname, telephone number, e-mail, place of residence and postcode. VAT number and Company Name for businesses and public bodies. This processing is necessary in order to respond to communications or assistance requests from the Data subjects.

4. Storage of the collected data

Data Controller Acea Innovation stores the collected data in a format that enables the identification of the Data subjects for the time strictly necessary for the pursuit of the purposes above, and in any case for no longer than 3 years.

5. Processing method

Data may be processed through automated means (e.g. electronic procedures and support) and/or manually (e.g. on paper) for the time strictly necessary for the pursuit of the purposes above, and always in



compliance with rules and regulations.

The Data Controller implemented technical and organizational measures that ensure a level of data security appropriate for the level of risk presented by processing personal data, in accordance with the principles of art. 32 of the GDPR, in order to prevent loss, unlawful, incorrect and unauthorized use of Data.

6. Data transfers abroad

Within the purposes described in this Privacy Policy, Acea Innovation does not transmit collected data to companies, bodies or international organizations located in Countries outside the European Union.

7. Data Subjects' rights

In accordance with Art.15 and subsequent, Data subjects shall be able to exercise their rights to access, amend, oppose and limit data treatment. Data Subjects shall always be entitled to submit a claim to the Italian Data Protection Authority. Said rights can be exercised by sending a request to the Data Controller at acea.innovation@pec.aceaspa.it.