

**DISCLOSURE ON THE PROCESSING OF PERSONAL DATA**  
**PURSUANT TO ART. 13 OF THE GENERAL DATA PROTECTION REGULATION (EU**  
**REGULATION 2016/679)**

This disclosure is made pursuant to art. 13 of the European Regulation on the protection of individual persons with regard to the processing of their personal data, EU Regulation 2016/679 (hereinafter the “GDPR”), and in respect of that envisaged by the Italian law on harmonisation and the measures adopted by the Guarantor Authority for the protection of personal data (in overall terms, the “Privacy Laws”).

Acea S.p.A., with legal head office in Piazzale Ostiense, 2, 00154 Rome, pec: acea.spa@pec.aceaspa.it, in the capacity of Data Controller and on behalf of the Companies in the Group that have entrusted such Service to it (hereinafter “the Controller”), hereby informs you of the purposes and methods of processing the data collected through the Romabylight application.

**Preamble**

For the definition of the terms contained in this disclosure and the description of each service, see that contained in the General Conditions of Use.

**Data processed, purpose of data processing and legal basis**

<b>Service</b>	<b>Data processed</b>	<b>Purpose of data processing</b>	<b>Legal basis</b>
Access to the platform	Name Surname E-mail	Registration on the application and access to the functions envisaged on the Home page	General Conditions of Use

**Method of processing personal data**

The Controller shall adopt all of the security measures aimed at preventing unauthorised access, divulgation, modification or destruction of the Personal Data.

Data will be processed using computerised and/or telematic tools, with organizational methods and logic strictly correlated to the purposes described.

**Conservation time**

<b>Data processed on the basis of the service provided</b>	<b>Conservation period</b>
Data processed for accessing the application	Access credentials are kept by the Controller for the period in which the User is registered on the application.

**Location**

Data is processed at the operating offices of the Controller and any other place in which the parties involved in data processing are located.

The Personal Data of the User may be transferred to a country other than that in which the User is based, but exclusively within the EU.

### **Data communication**

None of the personal data collected by the Controller and the Data Processing Officers appointed pursuant to art. 28 of the GDPR shall be spread or communicated to third parties outside of the specific regulatory provisions. Also, staff and collaborators of the Controller or Data Processing Officers may become aware of said data, and act as authorised persons. Specifically, the above subjects, suitably appointed and authorised, may have access to registered data only when dealing with an access request by the interested parties.

### **User rights**

The Users may exercise the rights envisaged by the law with regard to the Data processed by the Controller.

Specifically, the User has the right to:

- Object to the processing of their Data. The User may object to the processing of their Data when this is carried out on a legal basis other than consent. Further details on the right to object to data processing are described in the section below.
- Access their own Data. The User has the right to obtain information on the Data processed by the Controller, on specific aspects of the data processing and receive a copy of the Data processed.
- Verify and request the correction of their Data. The User may verify the accuracy of their own Data and request its updating or correction.
- Obtain limitations to data processing. Should specific conditions be in place, the User may request limitations to the processing of their own Data. In such an eventuality, the Controller will not retain the Data for any purpose other than its conservation.
- Delete or remove their own personal data. Should specific conditions be in place, the User may request the deletion of their own Data by the Controller.
- Receive their own Data or transfer it to another controller. The User has the right to receive their own Data in structured format, commonly used and legible on an automatic device and, if feasible in telematic terms, to transfer it without hindrance to another controller. This disposition is applicable if the Data is processed using automated tools and data processing is based on the consent of the User, on a contract to which the User is a party or on contractual measures related thereto.
- File complaints. The User may file a complaint to the competent controlling authority for the protection of personal data or take legal action.
- Taking into account that at the end of the conservation period indicated in this disclosure, the Personal Data will be deleted, when such deadline expires, the right to access, delete and correct data and the right to the portability of the Data may no longer be exercised.

### **How to exercise the rights**

In order to exercise the User rights, Users can send a request to the contact details of the Controller indicated in this document. Requests are dealt with by the Controller as soon as possible, and in any event within one month.

In the cases envisaged by the law, the User may file a complaint to the Guarantor for the protection of personal data and may contact the Data Protection Officer appointed by the Controller by writing to the e-mail address [privacy@aceaspa.it](mailto:privacy@aceaspa.it).