

**Privacy and Cookie Policy**  
**ex Art 13 of the General Data Protection Regulation EU 2016/679 (GDPR)**

Before communicating any personal data, we invite you to carefully read this "Privacy Policy" pursuant to art. 13 of the GDPR, addressed to those who consult and interact with the website, as it contains information regarding the protection of personal data and the security measures adopted to ensure their confidentiality in full compliance with the GDPR.

The Privacy Policy has been drafted in accordance with the Regulation and subsequent additions and amendments, including the Reference Recitals and the Guidelines of the Working Party ex art. 29, also in relation to the minimum requirements for online data collection in the European Union, and represents the Information to Data Subjects pursuant to art. 13 of the General Data Protection Regulation no. 679/2016 (GDPR) and the applicable national legislation on Privacy.

Please note that this Privacy Policy applies only to the site <https://www.vinci-energies.it/> and does not apply to other websites that may be accessed through our links.

**Data Controller**

Data Controller is VINCI Energies Italia S.r.l., P. IVA 05966260969 – Via Gallarate 205 – Milano – tel. 02.35949851 e-mail: [privacyvei@vinci-energies.com](mailto:privacyvei@vinci-energies.com). Data processed are those provided by identified or identifiable persons visiting our website.

**Types of data processed**

Data provided voluntarily by the users and navigation data are processed.

**Data provided voluntarily by the users**

The Data Controller collects and processes Personal Data provided voluntarily by individual Users. This category includes all the Personal Data provided by the User in a voluntary manner, for example in order to participate in surveys, to register for marketing events, or, in general, by filling in the contact form. Such Data will be used only for the purpose and for the time strictly necessary to fulfil the request of the individual User.

**Navigation data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check that it is functioning correctly

**Purposes and Legal Basis**

**Data provided voluntarily by the users**

The personal data provided by the user in an optional manner are used only to process any requests made and to execute legal and/or contractual obligations arising from the relationship in the case set

up, or, subject to consent, for marketing purposes as better specified in the Privacy Policy Contact Form. The legal bases for the processing of such data are therefore: consent, legal obligation and the performance of pre-contractual and contractual obligations.

Consent is given by means of the banner at the bottom of the page, or by means of the communication or service request forms specifically prepared, with which consent is collected for the specific purpose of the service. Consent to the collection and processing of data is optional, and may be denied and revoked at any time, without prejudice to the lawfulness of the processing given before revocation. However, denying consent may result in the inability to provide certain services and the site navigation experience may be reduced

#### **Navigation data**

Surfing data are used to obtain anonymous statistical information on the use of the website, for website security purposes and to check its correct functioning, and could be used to ascertain responsibility in the event of any computer crimes to the detriment of the website.

The legal basis for the processing of such data is the legitimate interest or consent - in the cases provided by law - and, in the case of requests by the Authorities, the legal obligation.

For the use of cookies or pixels for specific purposes, please refer to the cookie policy that can be consulted from the footer of the site.

#### **Place of data processing**

The processing operations connected to the web services of this website take place at our service provider within UE, who was specifically appointed as External Data Processor and are carried out directly by our employees specifically appointed and trained.

#### **Methods of data processing**

Personal data are processed with automated computer tools or, residually, by means of paper methods, for the time necessary to achieve the above purpose. With regard to browsing data, please refer to the cookie policy. Adequate security measures are in place to prevent any loss of data, unlawful or improper use, and unauthorized access.

Your Data are processed by our properly appointed and trained employees. Your Data may also be processed by trusted companies that provide technical and organizational tasks for the Data Controller. These companies are direct collaborators of Data Controller and, in accordance with Article 28 of the Regulations, are appointed as Data Processors and offer sufficient guarantees to put in place appropriate measures so that the processing of personal data complies with the Regulations and ensures the protection of the rights of the data subject.

The full list of Data Processors is constantly updated and can be viewed by sending a request to the Data Controller.

**Cookies** [Please read Cookies Policy](#)

#### **Transfer of data abroad:**

Data Controller may need to transfer Your Data to other group companies or service providers in countries outside the European Economic Area (EEA), consisting of the countries of the European Union and Switzerland, Liechtenstein, Norway and Iceland, which are considered countries with equivalent data protection and privacy laws. In such cases, we will ensure that your data is properly and adequately protected. We always make sure that there is a contract that governs the transfer of

data between the parties, in accordance with current European Commission decisions. If the state does not have equivalent data protection and privacy laws, we require third parties to sign a contract according to EU standards.

### **Rights of data subjects**

The data subject has the right to request from the controller access to and rectification or erasure of personal data or restriction of the processing of personal data concerning him or her, or to object to the processing of personal data, as well as the right to data portability. The rights recognized by current legislation on the protection of personal data are detailed below.

Right to withdraw consent: where applicable, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal;

Right of access, rectification and deletion: you have the right to request access to and receive a copy of your personal data in our possession, to request the correction of any inaccurate data and to request the deletion of your personal data in special circumstances.

Right to data portability: in certain circumstances, you have the right to receive all the personal data you have communicated to us in a structured, commonly used and computer-readable format; you may also ask us to transmit such data to another Data Controller where this is technically feasible.

Right to object to justified processing based on legitimate interests: in cases where our processing of personal data is based on legitimate interests, you will have the right to object to such processing. If you object to such processing, we will be obliged to stop the processing, unless we can demonstrate the existence of compelling legitimate grounds which outweigh your interests, rights and freedoms or where it is necessary for us to process such data in order to initiate, enforce or defend legal action. In cases where we rely on our legitimate interest as a justification for processing, we believe we can demonstrate such legitimate grounds, but each case will be examined on an individual basis.

Right to object to processing for marketing purposes: where personal data is processed for marketing purposes, you have the right to object to such processing at any time

Requests and communications should be addressed to the Data Controller by post, or by telephone on 02.35949851 or by email to [privacyvei@vinci-energies.com](mailto:privacyvei@vinci-energies.com).

Data subject who finds that the processing concerning him/her violates the GDPR regulation (Reg EU2016/679) has the right to lodge a complaint with a supervisory authority (Garante della Privacy).

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