

## **PRIVACY POLICY**

### **CUSTOMERS AND SUPPLIERS**

Dear Sir/Madam,

Dear Customer/Supplier,

in accordance with current national data protection legislation and in compliance with the provisions of EU Regulation n. 2016/679 GDPR (*General Data Protection Regulation*), VINCI Energies Italia S.r.l. (hereinafter also referred to as "VINCI") provides you with information regarding the processing of your personal data, based on principles of lawfulness, fairness and transparency and protection of your privacy and your rights.

#### **1. Purpose of the processing**

With reference to this data, we inform you that:

The data is processed in relation to contractual requirements and the consequent fulfilment of legal and contractual obligations arising therefrom, as well as to achieve effective management of commercial relationships and also for the purposes of credit protection and better management of our rights relating to commercial relationships.

If you are already a customer, VINCI may also use your data to send you advertising emails about products and services offered, similar to those previously purchased, unless you refuse such use by exercising your right to object as described below.

Furthermore, with your consent, your data may also be processed for the purpose of sending newsletters, commercial communications and/or promotional material, or opinion polls, as well as transferred to a third country outside the EU or to an international organisation.

#### **2. Access to data**

The Data may be made accessible for the purposes referred to in Article 1:

- to employees and collaborators of the Data Controller or of VINCI Group companies (in Italy and abroad), in their capacity as authorized persons and/or data processors;
- to third-party companies or other entities (for example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, supervisory bodies, companies that may be responsible for the installation, maintenance, updating and, in general, management of hardware and software, etc.) that perform outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

#### **3. Transfer of data to a third country and/or international organisation**

We may need to transfer your Data to other companies belonging to the same group or to 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 laws regarding data protection and privacy.

In this case, we will ensure that your data is properly and adequately protected.

■ VINCI Energies Italia S.r.l.  
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[www.vinci-energies.it](http://www.vinci-energies.it) | [vecontact@vinci-energies.com](mailto:vecontact@vinci-energies.com)

If the country does not have equivalent data protection and privacy laws, we require third parties to sign a contract in accordance with EEA standards.

#### **4. Methods of processing and retention period**

Personal data will be processed mainly with the aid of electronic or automated means, in accordance with methods and tools that guarantee the security and confidentiality of the data, in compliance with current national legislation and GDPR. In particular, all technical, IT, organisational, logistical and procedural security measures will be adopted to ensure the minimum level of data protection required by law, allowing access only to persons in charge of processing by the Data Controller or Data Processors designated by the Data Controller.

The Data will be processed for the time necessary to fulfil the purposes referred to in point 1 and in any case for no longer than 10 years from the termination of the relationship. After this retention period, the Data will be destroyed or made anonymous.

#### **5. Nature of the Provision**

The provision of Data is mandatory for all legal and contractual obligations and therefore any refusal to provide it or to allow its subsequent processing may make it impossible for VINCI to proceed with the contractual relationship.

Failure to provide all data not related to legal or contractual obligations will be assessed on a case-by-case basis by VINCI and will determine the consequent decisions related to the importance of the data requested with respect to the management of the commercial relationship.

#### **6. Rights of the data subject**

Pursuant to Article 15 of the GDPR and current national privacy legislation, the data subject may exercise their rights, including the right to consult, modify, delete data or object to its processing for the purposes of sending advertising material or commercial communications or opinion polls, by sending an email to [privacyvei@vinci-energies.com](mailto:privacyvei@vinci-energies.com).

Where applicable, we also draw your attention to the rights referred to in Articles 16-21 of the GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the Italian Supervisory Authority.

In the event of a request for data portability, the Data Controller will provide you with your personal data in a structured, commonly used and machine-readable format, without prejudice to paragraphs 3 and 4 of Article 20 of EU Regulation 2016/679.

#### **7. Data controller**

The Data Controller is VINCI Energies Italia S.r.l. – Via Gallarate 205 – Milan, VAT number 05966260969.

The updated and complete list of data processors is available at the registered office of the data controller VINCI Energies Italia S.r.l.