

PRIVACY POLICY OPEN-ES PLATFORM

Pursuant to Regulation (EU) 2016/679 ("GDPR"), Eni S.p.A. ("Eni", "Company" or the "Data Controller") provides below the information regarding the processing of your personal data collected or provided by you when using the services of the OPEN-ES platform (the "Platform"), accessible through the URL www.openes.io (the "Site"), identified and briefly described in article 1 of the General Terms and Conditions ("Services") available on the Platform.

1. Identity of the Data Controller

The Data Controller is Eni S.p.A., with registered office in Piazzale Enrico Mattei 1, 00144 Rome.

2. Contact details of the Data Protection Manager

The Company has appointed a Data Protection Officer, who can be contacted at the following e-mail address dpo@eni.com.

3. Types of data processed

a. Navigation data

The computer systems and software procedures used to operate the Platform 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 IP addresses or the domain names of the computers used by users connecting to a website, the URI (Uniform Resource Identifier) addresses of the resources requested, 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. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the website and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the Platform.

b. Data provided voluntarily by the user

The optional, explicit and voluntary sending of

- (i) personal data (e.g. name, surname, sex, date of birth, nationality, country of domicile, province of domicile (if in Italy))
 - (ii) contact data (e.g. e-mail address, telephone number),
 - (iii) data relating to one's education and work experience (e.g. qualification, area of study, type of professional experience).
- to the Data Controller, as well as data entered via forms on the Platform, entails the subsequent acquisition of such data, which is necessary to allow you to use the Services, respond to any e-mails, as well as to fulfil other requests.

c. Cookies

Cookies are small text files that are stored on your device when you visit a website. They serve to identify you during your navigation. The cookies used on the Platform serve to facilitate the user's navigation and will not be used for purposes other than those described in the Cookie Policy available on the Platform. If necessary, they can be disabled by adjusting the options on your browser. More information on the types of cookies used by the Platform can be found in the Cookie Policy available on the Platform.

4. Purpose of processing and legal basis of processing

a. Legal purposes - processing necessary to comply with a legal obligation to which the data controller is subject

Your personal data may be processed, without the need for your consent, in cases where this is necessary to fulfil obligations arising from legal provisions, as well as from standards, codes or procedures approved by Authorities and other competent Institutions. The provision of data is necessary and without it the Controller will not be able to comply with legal obligations.

b. Contractual purposes - processing necessary to fulfil your request, as well as for the execution of the agreement concluded by accepting the General Terms and Conditions

Your personal data will also be processed for purposes relating to and/or connected with the provision of the services you have requested from the Company in connection with your navigation of the Site, such as in particular

- for the provision of the Services requested by you while browsing the Platform or by filling in the forms therein, including the collection, storage and processing of data for the purposes of the establishment and subsequent operational and technical management;
- for the provision of the services requested by the user by registering on the Platform and creating their account and profile, including the collection, storage and processing of data for the purposes of the establishment and subsequent operational, technical and administrative management of the relationship (and of the account and profile created by the user) related to the provision of the Services and the execution of communications relating to the performance of the Services;
- ensure the normal use and navigation of the Site, even for non-registered users.

This data - the provision of which is necessary for the operational performance of the Services - will also be processed by electronic means, recorded in special databases, and used strictly and exclusively in the context of navigation on the Platform. As the communication of your data for the aforementioned purposes is necessary in order to maintain and provide the Services of the Platform, failure to do so will make it impossible to provide the specific Services in question to you.

c. Purposes based on a legitimate interest of the Controller

The Data Controller may process your personal data on the basis of its legitimate interest in improving the Services and protecting its business, in the following cases

- in the case of extraordinary operations of merger, sale or transfer of a company branch, in order to allow the carrying out of the operations necessary for the due diligence activity and preparatory to the sale. It is understood that the data processed for the above purposes will be exclusively necessary, in as aggregate/anonymous a form as possible;
- analysis in anonymous and aggregate form of the use of the services used, to identify habits and propensities of users, to improve the services provided and to meet specific user needs, or the preparation of initiatives related to the improvement of the services provided;
- whenever necessary in order to ascertain, exercise or defend a right of the Data Controller or of other companies falling within the Company's perimeter of control in court.

5. Recipients of personal data

For the pursuit of the purposes indicated in point 4, the Data Controller may communicate your personal data to third parties, such as, for example, those belonging to the following subjects or categories of subjects

- police forces, armed forces and other public administrations, for the fulfilment of obligations provided for by law, regulations or Community legislation;
- companies, bodies or associations, or parent companies, subsidiaries or associates pursuant to Article 2359 of the Civil Code, or between these and companies subject to joint control, as well as between consortia, networks of companies and temporary associations of companies and with their members, limited to communications made for administrative and/or accounting purposes
- companies specialised in the management of commercial or credit information, or advertising promotion;
- other companies contractually linked to the Data Controller that perform, by way of example, consultancy activities, support for the provision of services etc.

The Data Controller guarantees the utmost care so that the communication of your personal data to the aforementioned recipients only concerns the data necessary to achieve the specific purposes for which they are intended.

Your personal data are stored in the Data Controller's databases and will only be processed by authorised personnel. The latter will be provided with specific instructions on the methods and purposes of processing. Furthermore, these data will not be communicated to third parties, except as provided for above and, in any case, within the limits indicated therein.

Finally, we remind you that your personal data will not be disclosed, except in the cases described above and/or provided for by law.

6. Transfer of personal data outside the European Economic Area

For some of the purposes indicated in point 4, your personal data may be transferred outside the European Economic Area ("EEA"), also by means of inclusion in databases shared and/or managed by third companies that are part of the Controller's perimeter of control or not. The management of the database and the processing of such data are bound to the purposes for which they were collected and are carried out in full compliance with the standards of confidentiality and security set out in the applicable data protection laws.

Whenever your personal data is transferred internationally outside the EEA territory and, in particular, to States that do not benefit from an adequacy decision of the European Commission, the transfer will take place exclusively (i) subject to the signing of the standard contractual clauses adopted by the European Commission and the adoption of any other appropriate technical and organizational measures to ensure an adequate level of protection of personal data and, in any case, at least equal to that guaranteed within the EEA, or (ii) in the presence of one of the conditions referred to in Article 49 GDPR.

7. Period of data retention

The data will be kept for a period of time not exceeding that necessary for the purposes for which it was collected or subsequently processed in accordance with legal obligations.

8. Rights of the interested parties

As a data subject, you are granted the following rights on the personal data collected and processed by the Controller for the purposes indicated in point 4:

- to obtain confirmation from the Data Controller as to whether or not personal data is being processed and if so, to obtain access to the information referred to in Article 15 of the GDPR;
- obtain the rectification of inaccurate data concerning you, or, taking into account the purposes of the processing, the integration of incomplete data;
- obtain the deletion of data, in the presence of one of the reasons referred to in Article 17 of the GDPR;
- obtain the restriction of data processing in the cases provided for by the applicable law;
- object to the processing of data for particular reasons where there are no compelling legitimate interests of the Controller;
- receive in a structured, commonly used and machine-readable format the personal data concerning you as well as to transmit such data to another data controller without hindrance by the Company, where technically possible, in the cases and within the limits set out in Article 20 of the GDPR, where applicable.

You have the right to revoke any consent you may have given. Such revocation shall not affect the lawfulness of the processing based on the consent given before revocation.

The law also gives you the possibility to lodge a complaint with the Garante per la protezione dei dati personali, should you discover a violation of your rights under applicable data protection legislation.

You can exercise the rights listed above by writing to the Data Protection Officer dpo@eni.com.