

## PROCESSING OF PERSONAL DATA RELATED TO OUTBOUND HOSPITALITY

### Privacy Information Notice given to data subject for the processing of personal data

This privacy information notice is provided by Eni, to be understood as the parent company Eni S.p.A. or another group company acting as Data Controller (hereinafter the "**Company**" or the "**Data Controller**"). In particular, the Data Controller is to be considered the company that performs the processing as specified below. The data identifying the actual Data Controller is detailed in the list of Eni's subsidiaries available on the website [www.eni.com](http://www.eni.com), in the section "Publications" - "Annual and Quarterly Reports" - "Interim Consolidated Report" <sup>1</sup>.

Under the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "**GDPR**"), the Data Controller provides the following information on the processing of Your personal data (hereinafter "**Personal Data**" or "**Data**") carried out in the context of the provision of economic benefits that include the payment of expenses related to travel, meals, entertainment or other similar utilities by the Company or the Company's personnel on its behalf (hereinafter "**Outbound Hospitality**").

#### 1. Contact details in relation to the processing

For matters relating to the processing of Personal Data carried out as part of the Outbound Hospitality, You can contact the parent company Eni S.p.A. at the following address Piazzale Enrico Mattei, 1, 00144, Rome or at the following contact details: [DPO@eni.com](mailto:DPO@eni.com).

#### 2. Contact details of the Data Protection Officer ("DPO")

The Company has appointed a Data Protection Officer who can be contacted at the following email address [DPO@eni.com](mailto:DPO@eni.com).

#### 3. Categories of Personal Data

The Personal Data processed may include information in the public domain (including Data from public lists or registers, records, deeds or documents held by public entities), Your personal and contact Data, information relating to the company/entity for which You work and the position You hold, the position of public official You may have held, and any other details necessary to assess the compliance of the Outbound Hospitality to the internal procedures applicable to the Company. Special categories of Personal Data referred to in Article 9 of the GDPR may also be processed, which includes ethnic or racial origin, trade union membership, political orientation, religious belief (derived from particular requests) and health data (e.g. any food allergies or intolerances).

In addition, Data relating to criminal convictions, offences and related security measures may be processed, or the possible quality of a suspect or defendant in criminal proceedings.

#### 4. Purpose of data processing and its legal basis

The processing of Your Personal Data is carried out in order to ensure compliance with internal procedures regarding Outbound Hospitality.

The processing of Your Personal Data is necessary for the fulfillment of obligations driving from anti-corruption regulations to which the Data Controller is subject, as well as for the pursuit of the legitimate interest of the Data Controller to prevent the adoption of improper conduct by its personnel and that may damage the reputation of the Company, as well as for the investigation, exercise or defense of a right in court (including related prodromal activities).

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<sup>1</sup> The list is updated periodically as part of the issue of Eni S.p.A.'s Financial Reports. If the Eni Group company that actually provides the Outbound Hospitality is not included in the list, information on it can be requested from the parent company at the address indicated in paragraph 1.

The special categories of Personal Data referred to in Article 9 of the GDPR (as detailed above in paragraph 3) may be dealt with by the Company if the Data is in the public domain or made manifestly public or is otherwise permitted by law.

The provision of Your Personal Data is optional, but in the event of Your refusal, the Company may not be able to provide the Outbound Hospitality.

## **5. Personal Data Recipients**

For the pursuit of the purposes indicated in paragraph 4, Your Personal Data will be processed by personnel appointed by the Data Controller and may be communicated to (i) Eni S.p.a.; (ii) companies providing consultancy, audit, accounting audit and forensic services; (iii) companies offering hospitality services; and, where required, to (iv) the competent police, judicial and/or administrative authorities.

The Data will not be disclosed.

With reference to the Data communicated to them, the recipients belonging to the above mentioned categories may operate, depending on the cases, as data processors (and in this case they will receive appropriate instructions from the Data Controller) or as autonomous data controllers.

## **6. Transfer of Personal Data Outside the EU**

If it is instrumental for the purposes set out in paragraph 4, Your Personal Data may be transferred abroad to companies based outside the EU.

Some of these jurisdictions may not offer the same level of data protection as the country in which You reside. In this case, the Data Controller undertakes to ensure that the Data is processed with the utmost confidentiality by taking every necessary measure and entering into, where required, agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission.

## **7. How Personal Data Is Processed and Retention Period**

Your Data will be stored in the Data Controller's electronic archives and protected by appropriate security measures for the time necessary to achieve the purposes set out in paragraph 4, and will subsequently be deleted. Your Personal Data may be retained for a later period in the event of any litigation, requests from the relevant authorities or pursuant to applicable legislation.

## **8. Rights of data subjects**

At any time, You will be entitled to obtain confirmation from the Data Controller (i) whether or not Your Personal Data is being processed and, if so, to have access to the information referred to in Article 15 of the GDPR; (ii) the rectification of the inaccurate Data concerning You, or, taking into account the purpose of the data processing, the integration of incomplete Personal Data; (iii) the deletion of Your Personal Data, in the presence of one of the reasons referred to in Article 17 of the GDPR; and (iv) the restriction of the processing of Your Personal Data in cases required by applicable law. You will also have the right to object to the processing of Your Personal Data for particular reasons, where there are no legitimate vested interests of the Data Controller.

These rights may be exercised by writing to the contact details referred to in paragraph 1 or by sending an email to the Data Protection Officer appointed by the Company at the following e-mail [DPO@eni.com](mailto:DPO@eni.com). Without prejudice to any other administrative or judicial remedy, You also have the right to lodge a complaint with the relevant supervisory authority. More information about the contact details to which complaints should be addressed is available at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).