

## Privacy Policy of Rizziconi Energia S.p.A., pursuant to art. 13 of EU Regulation 2016/679 ("GDPR")

**Rizziconi Energia S.p.A.** with registered office in Via IV Novembre 149 - 00187 Rome and operational office in Via E. Albareto 21, 16153 Genoa ("**Rizziconi**"), is constantly striving to protect the online privacy of the users of its website <https://www.rizziconienergia.it> (the "**Site**"). This document (the "**Policy**") has been drafted to allow you to understand how your Personal Data, as defined below, will be processed when using the Site. The Policy is aimed at providing you with the necessary information so that you can express your explicit and informed consent to the processing carried out through the Site, if you deem it appropriate.

In general any information or Personal Data you provide to Rizziconi through the Site, or that is otherwise collected through the Site, as part of your use of the services offered by Rizziconi (the "**Services**"), as better defined in Paragraph 3 below, will be processed in accordance with the internationally recognized principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.

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#### 1. Data Controller

Rizziconi, as identified at the beginning of this Policy, is the Data Controller with respect to all Personal Data that are processed through the Site.

If necessary, you may contact the person in charge of data protection of Rizziconi at the following address: [privacy.it@axpo.com](mailto:privacy.it@axpo.com).

#### 2. Personal data processed

Following your navigation of the Site, we inform you that Rizziconi will process your Personal Data, which may consist - also depending on your decisions on how to use the Services - of an identifier such as your name, or one or more characteristic elements of your physical or social identity capable of making you identified or identifiable (hereinafter only "**Personal Data**").

Your Personal Data may be collected either because you voluntarily provide them (e.g. when you enter your data in order to be contacted by Rizziconi) or simply by analyzing your behavior on the Site.

##### a. Name, contact details and other Personal Data

In the section Contacts of the Site, relevant to the insertion of data, in order to be contact by the company for the programming of a visit to the Rizziconi Energia plant, you will be asked to fill in with information such as your name, telephone number, email, address, etc.

##### b. Data voluntarily provided by the data subject

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#### Rizziconi Energia S.p.A. – Società con Socio Unico

Sede legale: Via IV Novembre, 149 | IT - 00187 Roma | T +39 06 454 68 21 | F +39 06 454 682 222 | [www.axpo.com](http://www.axpo.com)

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Iscritta al Registro delle Imprese di Roma, C.F. e P. IVA: 03744381215

Iscritta al REA presso la CCIAA di Roma al n° 1544316 | Capitale sociale 500.000,00 € i.v.

Società soggetta a direzione e coordinamento da parte di Axpo Power AG - Parkstrasse 23 - CH-5401 Baden

As already mentioned above, in some parts of the Site (such as entering your data to request a contact) you are allowed to communicate information of various kinds to Rizziconi, which may contain Personal Data of other people.

In this case, you act as autonomous data controller, assuming all the obligations and responsibilities of the law. In this sense, you agree to indemnify Rizziconi in full against any dispute, claim, request for compensation for damage caused by processing, etc., that may be received by Rizziconi from third parties whose Personal Data has been processed through your use of the functions of the Website in violation of the applicable rules on the protection of personal data. In any case, if you provide or otherwise process Personal Data of third parties in the use of the Site, you warrant as of now - assuming all related liability - that this particular case of processing is based on the consent of such third party or on another appropriate legal basis that legitimizes the processing of such information.

### **c. Navigation Data**

The cyber systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by their 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 domain names of computers used by users who connect to the Site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and computer environment. These data are used only to obtain anonymous statistical information on the use of the Site and to check its correct functioning, to identify anomalies and/or abuses, and are deleted immediately after processing. The data could be used to assessment of responsibility in case of hypothetical cyber crimes against the site or third parties: except for this possibility, the data on web contacts do not persist for more than seven days.

### **d. Cookie**

#### *Definitions, characteristics and enforcement*

Cookie are small text files that sites visited by the user send and record on his computer or mobile device, to be then transmitted to the same sites at the next visit. Thanks to cookie, a site remembers the user's actions and preferences (such as, for example, login data, the language chosen, font size, other display settings, etc.) so that they do not have to be indicated again when the user returns to that site or navigates from one page to another of it. Cookie, therefore, are used to perform computer authentication, session monitoring and storage of information regarding the activities of users who access a site and may also contain a unique identification code that allows you to keep track of user navigation within the site for statistical or advertising purposes. While browsing a site, the user may also receive on his computer cookies from sites or web servers other than the one he is visiting (so-called "**third party cookie**").

Some operations could not be carried out without the use of cookie, which in some cases are therefore technically necessary for the functioning of the site.

There are several types of cookies, depending on their characteristics and functions, and these can remain on the user's computer for different periods of time: so-called **session cookie**, which are automatically deleted when the browser is closed; so-called **persistent cookie**, which remain on the user's equipment until a pre-established expiry date.

According to current law, the use of cookie does not always require the explicit consent of the user. In particular, "*technical cookie*" do not usually require such consent, i.e. those used for the sole purpose of carrying out the transmission of a communication on an electronic communication network, or to the extent strictly necessary to provide a service explicitly requested by the user. In other words, these cookie are indispensable for the functioning of the site or necessary to carry out the activities requested by the user.

Types of cookie used by the site and possibility of (de)selection

The Site uses the following cookie, which can be de-selected, except for third party cookies for which you should refer directly to the relevant cookie selection and de-selection methods, indicated by means of links:

- **Navigation or session technical cookie**, which are strictly necessary for the operation of the Site or to allow you to take advantage of the content and services requested.

- **Analytical cookie**, which allow us to understand how the Site is used. These cookies do not collect information about your identity or any Personal Data. The information is processed in aggregate and anonymous form.
- **Functionality cookie**, i.e. used to enable specific features of the Site and a number of selected criteria (e.g. language) in order to improve the service provided.

Rizziconi uses **third-party cookie**, i.e. cookie from sites or web servers other than Rizziconi's, used for purposes specific to these third parties. Please note that these third parties, listed below with the relevant links to their privacy policies, are typically independent data controllers of the data collected through the cookie they serve, or act as data processors for Rizziconi (i.e. they process Personal Data on behalf of Rizziconi).

#### **Cookie on the Site**

In detail, the cookie sent by Rizziconi through the Site <https://www.Rizziconienergia.it> are listed in the document "*Cookie List*" on the page Cookie Policy of the site, which is an annex to this Policy.

#### *Cookie settings*

You can block or delete (in whole or in part) technical and functionality cookie through the specific functions of your Browser. Please note, however, that if you do not allow technical cookie, you may not be able to use the Site, view its contents and take advantage of its services. Inhibiting functionality cookies may result in some services or features of the Site not being available or not working properly and you may be required to modify or manually enter certain information or preferences each time you visit the Site.

The choices you make with respect to the Site's cookies will be recorded in a cookie. However, this cookie may not function properly in certain circumstances: in such cases, we recommend that you delete the cookies you do not like and inhibit their use through the features of your browser.

Your cookie preferences will need to be reset if you use different devices or browsers to access the Site.

How to view and modify cookie through your Browser.

You can authorize, block or delete (in whole or in part) cookie through the specific functions of your Browser. For more information on how to set preferences on the use of cookie through your Browser, you can consult the relevant instructions:

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)
- [Safari](#)

You can also manage your choices with respect to third-party cookie using online platforms such as AdChoice.

**WARNING:** If you disable technical and/or functionality cookie, the Site may not be available to you or some services or features of the Site may not be available or may not function properly, and you may be required to change or manually enter certain information or preferences each time you visit the Site.

### **3. Purpose of processing**

Rizziconi will use your Personal Data, collected through the Site, for the following purposes:

- provide you with the Contact Service in order to schedule a visit to the Exchange ("**Service Provision**");
- to comply with legal obligations that require Rizziconi to collect and/or further process certain types of Personal Data ("**Compliance**");
- prevent or detect any abuse of your use of the Site, or any fraudulent activity, and thereby allow Rizziconi to protect itself in court ("**Abuse/Fraud**");

### **4. Legal basis and obligatory or optional nature of the treatment**

The legal bases used by Rizziconi to process your Data, according to the purposes indicated in Paragraph 3 above, are as follows:

- **Provision of the Service:** processing for this purpose is necessary in order to provide you with the requested Service. You are not required to provide Rizziconi with your Personal Data for this purpose, but if you do not, we will not be able to provide you with any Service.
- **Compliance:** processing for this purpose is necessary for Rizziconi to comply with any legal obligation. When you provide Personal Data to Rizziconi, it must be processed in accordance with applicable law, which may involve its retention and disclosure to authorities for accounting, tax or other purposes.

- **Abuse/Fraud:** The information collected for this purpose will be used solely to prevent and/or detect any fraudulent activity or abuse in the use of the Site and therefore allows Rizziconi to protect itself in court.

## 5. Recipients of personal data

Your Personal Data may be shared with the subjects listed below (the "**Recipients**"):

- parties that typically act as data processors, i.e.: i) persons, companies or professional firms that provide assistance and consulting to Rizziconi in accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services;
- subjects with whom it is necessary to interact in order to provide the Services (for example hosting providers or suppliers of platforms for sending emails);
- subjects delegated to carry out technical maintenance activities (including the maintenance of network equipment and electronic communication networks);
- persons authorized by Rizziconi to process Personal Data necessary to carry out activities strictly related to the provision of Services, who have committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. Rizziconi employees);
- other companies of the Axpo Group for internal administrative purposes;
- individuals, entities or authorities to whom it is mandatory to disclose your Personal Data for Compliance, Abuse or Fraud purposes, or by order of the authorities.

## 6. Transfers of personal data

Given Rizziconi's international presence, some of your Personal Data is shared with Recipients who may be located outside the European Economic Area.

Rizziconi ensures that the processing of Personal Data by these Recipients is done in accordance with applicable law. Indeed, transfers are made with appropriate safeguards, such as decisions of adequacy, Standard Contractual Clauses approved by the European Commission or others. More information is available from Rizziconi by writing to the following address: [privacy.it@axpo.com](mailto:privacy.it@axpo.com).

## 7. Storage of personal data

Personal Data processed for the purpose of **Providing the Service** will be retained by Rizziconi for as long as is necessary for that purpose. However, as this Personal Data is processed to provide you with the Service, Rizziconi may retain it for a longer period, particularly as may be necessary to protect Rizziconi's interests against possible claims related to the Service.

Personal Data processed for **Compliance** purposes will be retained by Rizziconi for the period required by specific legal obligations or applicable law.

Personal data processed to prevent **Abuse/Fraud** will be retained by Rizziconi for as long as is necessary for this purpose and until such time as Rizziconi is required to retain it to protect itself in court or to report it to the appropriate authorities.

## 8. Rights of the interested party

You have the right to ask Rizziconi, at any time:

- access to your Personal Data, (or a copy of such Personal Data), as well as further information on the ongoing processing of such Personal Data;
- the rectification or updating of your Personal Data processed by Rizziconi, if they are incomplete or not updated;
- the deletion of your Personal Data from Rizziconi's databases; the limitation of the processing of your Personal Data by Rizziconi;
- to obtain your Personal Data in a structured, commonly used and machine-readable format.

In addition to the above, you can also exercise your rights by writing to Rizziconi at the following address: [privacy.it@axpo.com](mailto:privacy.it@axpo.com).

In any case, you always have the right to lodge a complaint with the competent Control Authority (Guarantor for the Protection of Personal Data) if you believe that the processing of your Personal Data is contrary to the current regulations.

## **9. Amendments**

Rizziconi reserves the right to modify or simply update the content, in part or completely, also due to changes in the applicable legislation. Rizziconi will inform you of these amendments as soon as they are introduced and they will be binding as soon as they are published on the Site. Rizziconi therefore invites you to visit this section regularly to check the most recent and up-to-date version of the privacy policy so that you are always up-to-date on the data collected and how it is used by Rizziconi.