

PRIVACY POLICY FOR SUPPLIERS/CONTRACTORS

Pursuant to Regulation (EU) 2016/679 (hereinafter the “GPRD”), Italiana Petroli S.p.A. and its subsidiaries (hereinafter the “Company” or “Data Controller”) hereby provide the Privacy Policy regarding the processing of personal data provided by you as part of our contractual relationships.

In this regard, personal data concerning you, your employees and any subcontractors may or will be collected and processed.

1. Identity and contact details of the Data Controller

Each API Group company qualifies as a Data Controller with reference to the contracts/orders it has entered into in its capacity as Contracting Authority.

Below are the contact details of the Data Controller:

COMPANY	ADDRESS OF DATA CONTROLLER
Italiana Petroli S.p.A.	Via Salaria 1322 - 00138 Rome
IP Industrial S.p.A.	Via Malagrotta 226 - 00166 Rome
Bitumtec S.r.l.	Via Amalfi 4 - 10088 Volpiano (Turin)
API Raffineria di Ancona S.p.A.	Via Flaminia 685 - 60015 Falconara Marittima (Ancona)
IP Services S.r.l.	Via Salaria 1322 - 00138 Rome
Sigea _Sistema integrato Genova Arquata S.p.A.	Via Girolamo Gastaldi 10 - 16163 Genoa
Sòlerys S.p.A.	Via Salaria 1322 - 00138 Rome
La Cantina S.r.l.	Via Salaria 1322 - 00138 Rome
Campana energie rinnovabili S.r.l.	Via Salaria 1322 - 00138 Rome
ESE S.r.l.	Via Salaria 1322 - 00138 Rome
Engycalor Energia Calore S.r.l.	Via Salaria 1322 - 00138 Rome
Sarpom S.r.l. Società a responsabilità limitata raffineria padana olii minerali	Via Salaria 1322 - 00138 Rome

2. Contact details of the Data Protection Officer (hereinafter the “DPO”)

Each of the above companies has appointed a Data Protection Officer, who may be contacted at the following email address:

COMPANY	CERTIFIED EMAIL ADDRESS (PEC)
Italiana Petroli S.p.A.	dpoitalianapetroli@pec.gruppoapi.com
IP Industrial S.p.A.	dpoipindustrial@pec.gruppoapi.com
Bitumtec S.r.l.	dpobitumtec@pec.gruppoapi.com
API Raffineria di Ancona S.p.A.	dporaffineria@pec.gruppoapi.com
IP Services S.r.l.	dpoipservices@pec.gruppoapi.com
Sigea _Sistema integrato Genova Arquata S.p.A.	dposigea@pec.gruppoapi.com
Sòlerys S.p.A.	dposolerys@pec.gruppoapi.com
La Cantina S.r.l.	dpolacantina@pec.gruppoapi.com
ESE S.r.l.	dpoese@pec.gruppoapi.com
Engycalor Energia Calore S.r.l.	dpoengycalor@pec.gruppoapi.com
Sarpom S.r.l. Società a responsabilità limitata raffineria padana olii minerali	dposarpom@pec.gruppoapi.com

3. Purpose of processing and legal basis of processing

a. Necessary 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 standards, codes or procedures approved by Authorities and other relevant Institutions. In addition, your personal data may be processed to follow up on requests from the relevant administrative or judicial authority and, more generally, from public entities, in compliance with legal obligations.

Your personal data also will be processed for purposes related to product/service evaluation:

- To assess the technical, economic and financial suitability of your product/service, and establish whether you meet all requirements under applicable regulations (e.g. supplier/contractor qualification);

- To enable proper regulatory, technical and financial management of the contractual relationship. Insofar as the disclosure of your data for the above purposes is necessary, failure to do so will make it impossible to establish the contractual relationship with the Company.

b. Purpose of proper performance and management of the contract

Your personal data will also be processed for the purposes necessary for the proper management of the contract entered into with the Company.

c. Defence of legal claims

In addition, your personal data will be processed whenever necessary in order to establish, exercise or defend a legal claim of the Data Controller or other API Group companies (and subsidiaries).

4. Personal data recipients

In the pursuit of the purposes set forth in Section 3, the Data Controller may disclose your personal data to third parties, including but not limited to, those belonging to the following entities or categories of entities:

- Authorities or public bodies for the fulfilment of statutory requirements;
- API Group companies for administrative and contract/relationship management purposes;
- Companies specialising in debt collection;
- Companies specialising in the management of commercial or credit-related information, or advertising promotion;
- Other companies with which the Data Controller has in place agreements of various kinds.

The Data Controller shall make its best effort to ensure that disclosure of personal data to the aforementioned recipients pertains only to the data necessary to achieve the specific purposes for which they are intended.

5. Transferring your personal data abroad

Where the Data Controller entrusts third-party companies appointed as external data processors with tasks involving the processing of your data, database management and processing operations relating to such data are bound to the purposes for which they were collected within the scope of this policy and are carried out in strict compliance with the standards of confidentiality and security set out in the applicable data protection laws. Whenever your personal data are to be transferred abroad, the Data Controller will take all appropriate and necessary contractual measures to ensure an adequate level of protection of your personal data in accordance with the provisions set out within this Privacy Policy, including, among others, the Standard Contractual Clauses approved by the European Commission.

6. Data retention time

Your data will be retained ten years after the contractual relationship has ended to enable the Company to defend itself against possible claims made in connection with the contract. At the end of that period, they will be erased or otherwise irreversibly de-identified, unless further retention of some or all of the data is required by law.

Personal data of qualified suppliers/contractors not bound by contract will be retained for a period of time not exceeding five years after qualification.

With reference to data processed court litigation proceedings, the retention period is identified in the decision becoming final as well as the statutory limitation periods for the execution of the judgement (Article 2953 of the Italian Civil Code).

7. Data subject rights

As a data subject, you have the right to obtain from the Data Controller access to personal data and information relating to the processing; the rectification of inaccurate personal data concerning you and, taking into account the purposes of the processing, the right to obtain that your incomplete personal data are updated, including by providing a supplementary statement. You also have the right to obtain the deletion of personal data concerning you, as well as the portability of such data and restrictions on processing in the cases as laid down by law. You may exercise the rights listed above by contacting the company acting as data controller using the contact details under 1 above or by sending an email to privacy@italianapetroli.it, or by writing to the Data Protection Officer using the contact details under 2 above with reference to each company.

Lastly, we would like to remind you that if, with reference to the processing operations hereunder, you believe that there is a breach of the current privacy and personal data protection legislation has occurred, then you will also have the right to lodge a complaint with the Supervisory Authority for the Protection of Personal Data whose contact details can be found at www.garanteprivacy.it