



Be Charge S.r.l  
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## PROCESSING OF PERSONAL DATA OF USERS OF THE “Plenitude On the Road” APP – PRIVACY NOTICE

Pursuant to Regulation (EU) 2016/679 (“GDPR” or “Regulation”), Be Charge S.r.l. (“Be Charge” or “Controller”) provides the following information regarding the processing of personal data of users (“Users”) of the “Plenitude On the Road” application managed by Be Charge (“App”), in accordance with the provisions of the Regulation. Specifically, this notice applies to:

- a) registered users of the App, i.e., users who have completed the registration process within 30 days and created an account on the App (“Registered User”);
- b) non-registered users who use charging services as “guest” without creating an account (“Non-Registered User” or “Guest”);
- c) users who have downloaded the App without completing the registration process or using the App as a guest (“Downloader”).

### 1. DATA CONTROLLER

The Data Controller is Be Charge S.r.l., with registered office at Via Carlo Bo 11, 20143 Milan (MI), which can be reached via email at: [privacy@bec.energy](mailto:privacy@bec.energy).

### 2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

Be Charge has appointed a Data Protection Officer, who can be reached at the following email address: [dpo@eni.com](mailto:dpo@eni.com).

### 3. PURPOSES, LEGAL BASIS OF PROCESSING, NATURE OF DATA PROVISION, AND RETENTION OF PERSONAL DATA

#### A) Registered Users

The personal data of Registered Users will be processed by Be Charge for the following purposes:

- I. provision and use of the services offered through the App;
- II. management of customer support and information requests;
- III. compliance with legal obligations, regulations, or orders issued by authorities empowered by law;
- IV. establishment, exercise, or defense of legal claims by Be Charge or third parties, and corporate operations;



#### Be Charge S.r.l

Società con socio unico  
Capitale Sociale € 500.000,00 i.v.  
Registro Imprese di Milano-Monza-Brianza-Lodi  
Codice Fiscale e Partita IVA 09957510960 - R.E.A. MI - n. 2124183  
Società soggetta all'attività di direzione e coordinamento di Eni SpA

- V. sending of editorial communications via email from the Controller related to electric mobility and related topics;
- VI. sending of promotional and commercial communications by the Controller related to Be Charge products and services, group companies, or partners;
- VII. sending of personalized promotional and commercial communications by the Controller related to Be Charge products and services;
- VIII. communication of Registered User data to Be Charge's business partners for sending promotional and/or commercial communications about their products and services;
- IX. conducting aggregated statistical analyses.

#### **I. Provision and Use of Services Offered via the App**

The personal data of Registered Users will be processed by the Controller to enable the provision of various services accessible to Registered Users through the App ("**Services**") requested upon registration, such as:

- A. account creation;
- B. charging services;
- C. purchase of products, such as RFID cards, subscriptions, prepaid cards;
- D. participation in the Loyalty Be Together program ("**Loyalty Be Together**").

In addition to the data requested from the Registered User to provide the above Services, the Controller may request additional personal data necessary to provide specific requested services or products.

If the Registered User creates an account linked to the billing profile of a third party (e.g., employer), the Controller may share charging data with the third party based on specific agreements between the third party and Be Charge for service management.

The legal basis for processing is the performance of a contract to which the Registered User is a party and/or pre-contractual measures taken at their request (Art. 6(1)(b) of the GDPR), ensuring the provision of Services as per the [App's Terms and Conditions](#).

If the Registered User joins Loyalty Be Together, data processing will be as specified in the relevant [privacy notice](#).

The provision of data is mandatory for using the Services; failure to provide such data



will prevent access to App functionalities reserved for Registered Users.

Personal data collected to ensure the provision of Services will be retained for the duration of the contractual relationship and for 10 years after its termination to allow Be Charge to defend against potential claims related to the contract.

If the User does not complete registration within 30 days, data provided up to that point will be deleted.

## **II. Management of Customer Support and Information Requests**

The personal data of Registered Users will be processed by the Controller to properly handle information and support requests sent to customer care by Registered Users.

The legal basis for processing is the performance of a contract to which the Registered User is a party and/or pre-contractual measures taken at their request (Art. 6(1)(b) of the GDPR), ensuring Be Charge's response to assistance and/or information requests.

Data provision is not mandatory; however, failure to provide such data will prevent Be Charge from addressing information and support requests.

Personal data provided for customer care requests will be retained for the duration of the contractual relationship and for 10 years after its termination to allow Be Charge to defend against potential claims related to the contract.

## **III. Compliance with Legal Obligations, Regulations, or Orders from Authorities**

The personal data of Registered Users will be processed by the Controller for compliance with legal obligations, regulations, and orders issued by authorities empowered by law.

The legal basis for processing is the fulfillment of legal obligations, regulations, and orders to which Be Charge is subject as the Controller (Art. 6(1)(c) of the GDPR).

Personal data will be retained as necessary to fulfill these obligations, specifically for 10 years after the end of the fiscal year following invoice issuance for administrative and accounting purposes.



#### **IV. Verification, Exercise, or Defense of Rights by Be Charge or Third Parties and Corporate Transactions**

The personal data of Registered Users will be processed by the Data Controller:

- a) for purposes related to the verification, exercise, or defense of a right of Be Charge or third parties (e.g., managing legal disputes and/or settlements);
- b) in connection with activities preparatory to, or in the context of, potential corporate transactions (such as due diligence, mergers, demergers, acquisitions, transfer of assets and/or business units, etc.);
- c) for handling potential complaints and/or disputes.

The legal basis for this processing is the legitimate interest of the Data Controller and/or third parties to defend and protect the rights and/or interests of Be Charge and/or third parties, as well as to conduct corporate transactions (Art. 6(1)(f) of the GDPR).

The personal data of Registered Users will be retained for as long as necessary to protect the rights and/or interests of Be Charge and/or third parties and to carry out any corporate transactions, in compliance with statutory limitation periods.

#### **V. Transmission by the Data Controller of Editorial Communications via Email Regarding Electric Mobility and Related Topics**

The personal data of Registered Users will be processed by Be Charge for sending editorial communications via email, providing insights on, for example, news about electric mobility, travel itineraries, and sustainability.

The legal basis for this processing is Be Charge's legitimate interest in keeping Registered Users informed about electric mobility and related topics (Art. 6(1)(f) of the GDPR).

Registered Users may opt-out from receiving such communications at any time by clicking the appropriate link in each email sent by Be Charge.

The personal data will be retained until the user opts out.

#### **VI. Transmission by the Data Controller of Promotional and Commercial Communications Regarding Be Charge Products and Services, Group Companies, or Partners**

The personal data of Registered Users may be processed for sending, via email and/or App notifications, promotional and commercial communications related to:



- a) products and services of Be Charge; and/or
- b) products and services of Be Charge's group companies (Eni Plenitude S.p.A. Società Benefit; Plenitude Energy Services S.p.A.; ENI S.p.A.; Enilive S.p.A.); and/or
- c) products and services of other partners of Be Charge (e.g., in the automotive, travel, tourism and hospitality, energy sectors).

The legal basis for this processing is the explicit and freely given consent of the Registered User (Art. 6(1)(a) of the GDPR).

Consent for this processing is optional and can be withdrawn at any time as described below. Withdrawal or refusal of consent will not affect the Registered User's ability to use the Services.

The personal data provided for this purpose will be retained for 24 months from the date of consent, unless the Registered User revokes their consent:

- a) By accessing their personal area in the App, in the "Profile" section > "Privacy and Terms & Conditions"; or
- b) By clicking the appropriate link provided in each communication sent via email by Be Charge.

Withdrawal of consent will not affect the lawfulness of the processing based on consent before its withdrawal.

## **VII. Transmission by the Data Controller of Personalized Promotional and Commercial Communications**

The personal data of Registered Users may be processed for sending personalized promotional and/or commercial communications via email and App notifications concerning Be Charge products and the Be Together Loyalty Program.

Personalization will be based on:

- a) purchase and/or charging behavior within the App (e.g., preferred charging stations, purchase of RFID cards);
- b) interactions with the App (e.g., visited sections);
- c) demographic and preference data (e.g., address, predominant country, selected language).



The legal basis for this processing is the explicit and freely given consent of the Registered User (Art. 6(1)(a) of the GDPR).

The consent to process data for this purpose is optional and may be revoked by the Registered User at any time using the methods described below. Failure to provide consent or its revocation will not affect the Registered User's ability to use the Services.

The personal data provided for this purpose will be retained for 24 months from the consent grant, unless the Registered User revokes their consent:

- a) By accessing their personal area in the App, in the "Profile" section > "Privacy and Terms & Conditions"; or
- b) By clicking the appropriate link provided in each communication sent via email by Be Charge.

Withdrawal of consent will not affect the lawfulness of the processing based on consent before its withdrawal.

#### **VIII. Communication of Registered User Data to Be Charge's Commercial Partners for Promotional or Commercial Communications**

The personal data of Registered Users may be disclosed by Be Charge to its commercial partners for the partners to send promotional and/or commercial communications regarding their products or services.

Specifically, data may be shared with:

- a) companies within the Be Charge group (e.g., Eni Plenitude Group, Plenitude Energy Services S.p.A., ENI S.p.A., Enilive S.p.A.); or
- b) other commercial partners of Be Charge (e.g., in the automotive, travel, tourism and hospitality, energy sectors).

The legal basis for this processing is the explicit and freely given consent of the Registered User (Art. 6(1)(a) of the GDPR).

The consent to process data for this purpose is optional and can be revoked by the Registered User at any time using the methods described below. Failure to provide consent or its revocation will not affect the Registered User's ability to use the Services.



The personal data provided for this purpose will be retained for 24 months from the consent grant, unless the Registered User revokes their consent:

- A. By accessing their personal area in the App, under the "Profile" section > "Privacy and Terms & Conditions"; or
- B. By clicking the appropriate link provided in each communication sent via email by Be Charge.

Withdrawal of consent will not affect the lawfulness of the processing based on consent before its withdrawal.

#### **IX. Conducting Aggregate Statistical Analysis**

Personal data of Registered Users collected during App usage, including through tracking tools (e.g., Appsflyer SDK and Firebase SDK), will be processed for preparing aggregated, anonymous statistics related to Be Charge's App activities.

The legal basis is Be Charge's legitimate interest in evaluating and improving App services (Art. 6(1)(f) of the GDPR).

Data processed for statistical purposes will not be used for decisions about individuals or for unrelated purposes.

#### **B) Non-Registered Users**

Be Charge will process personal data of **Non-Registered Users** for:

- I. provision and utilization of charging services via the App;
- II. managing customer service and information requests;
- III. compliance with legal, regulatory, and authoritative requirements;
- IV. verification, exercise, or defense of rights and corporate transactions;
- V. conducting aggregate statistical analyses.

#### **I. Provision and Utilization of Charging Services via the App**

The personal data of Unregistered Users will be processed by the Data Controller to enable the provision of the charging service to Unregistered Users who use the App as



guests (without completing the registration process and creating an account, but by only creating a billing profile).

The legal basis for this processing is the performance of a contract to which the Unregistered User is a party and/or pre-contractual measures taken at their request (Art. 6(1)(b) of the GDPR) in order to ensure the delivery of the charging service to Unregistered Users as specified in the [Terms and Conditions of the App](#).

Providing this data is mandatory for the use of the services offered by the App as an Unregistered User; therefore, failure to provide the data will prevent the use of the App's functionalities available to Unregistered Users.

The personal data of Unregistered Users collected to ensure the provision of the charging service through the App (billing data) will be retained for 10 years from the date of issuance of each invoice, in order to allow Be Charge to defend itself against any claims related to the provision of the charging service by Be Charge.

## **II. Customer Service and Information Requests**

The personal data of Unregistered Users will be processed by the Data Controller to ensure the proper management of information and assistance requests submitted to customer care.

The legal basis for the processing is the performance of the contract to which the Unregistered User is a party and/or pre-contractual measures taken at their request (Art. 6(1)(b) of the GDPR), in order to ensure that the Unregistered User receives a response from Be Charge to their assistance and/or information requests.

Providing the data is not mandatory; therefore, failure to provide the data will prevent Be Charge from handling information and assistance requests.

The personal data of Unregistered Users provided through customer care requests will be stored according to the following criteria:

- a) In the case of information requests, the data will be retained for the time necessary to respond to the request and for one year from the last interaction with the Unregistered User.
- b) In the case of requests for assistance, complaints, and/or reports, the data will be retained for 10 years from the last charging session, in order to allow Be





Charge to defend itself against any claims related to the provision of the charging service by Be Charge.

### **III. Compliance with Legal Obligations**

Data will be processed for compliance with laws, regulations, and legitimate authorities.

The legal basis for the processing is the fulfillment of legal obligations, regulations, and provisions of Authorities legitimized by law to which Be Charge is subject (Art. 6(1)(c) of the GDPR), in its capacity as Data Controller.

This includes, in particular, the obligation to retain billing data related to each charging session performed by the Unregistered User. For each charging session, the data will be retained for 10 years from the end of the fiscal year following the issuance of the invoice for administrative and accounting purposes.

### **IV. Verification, Exercise, or Defense of a Right of Be Charge or Third Parties and Corporate Transactions**

The personal data of Unregistered Users will be processed by the Data Controller:

- a) for the purposes of verification, exercise, or defense of a right of Be Charge or third parties (for instance, for the management of legal disputes and/or settlements);
- b) for activities preparatory to and within the scope of potential corporate transactions (such as due diligence, mergers, demergers, acquisitions, transfers of assets and/or business units, etc.);
- c) for handling potential complaints and/or disputes.

The legal basis for such processing is the legitimate interest of the Data Controller and/or third parties to exercise the right to defense and protect the rights and/or interests of Be Charge and/or third parties, as well as to conduct any corporate transactions (Art. 6(1)(f) of the GDPR).

The personal data of Unregistered Users will be retained for as long as necessary to safeguard the rights and/or interests of Be Charge and/or third parties and to execute any corporate transactions, respecting ordinary statutory limitation periods.



## **V. Conducting Aggregate Statistical Analyses**

The personal data of Unregistered Users collected during the use of the App, including via tracking tools used by the App (such as SDKs from Appsflyer and Firebase), will be processed for creating anonymous and aggregated statistics relevant to Be Charge's activities within the App.

The legal basis for this processing is Be Charge's legitimate interest in evaluating the services offered via the App to improve its functionality and features based on user interactions (Art. 6(1)(f) of the GDPR).

In any case, the personal data processed for statistical purposes will not be used to make decisions or take measures affecting individual Users, nor for any other purpose.

## **C) Downloaders**

Personal data of Users who have downloaded the App but have not registered or used the App in guest mode will not be processed by Be Charge.

No personal data related to Downloaders will be retained or processed, except in the following scenarios:

- a) the Downloader consents to receive push notifications from the App via their device settings, or
- b) the Downloader clicked on an ad from Google or Meta that directed them to the app store to download the App.

In these cases, Be Charge will associate an ID with each Downloader, making the device identifiable and, only if the Downloader has enabled location settings within the App, linking the area of origin of the connection.

## **4. SCOPE OF COMMUNICATION AND RECIPIENTS OF PERSONAL DATA**

Personal data will be processed for the purposes outlined above by Be Charge's internal staff, who are expressly authorized and trained to handle personal data.



Additionally, personal data may be disclosed for the stated purposes to:

- a) entities providing services on behalf of Be Charge, appointed as data processors (e.g., IT service providers);
- b) public or private entities (e.g., insurance companies, banks, legal consultants, public authorities, judicial bodies, tax authorities) that will act as independent data controllers;
- c) entities engaged in promotional and advertising activities via App banners;
- d) third parties, with the User's consent, who will act as independent data controllers to send commercial communications about their products and services.

The personal data of users will not be disclosed.

## **5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

Personal data of Users will not be transferred outside the European Economic Area.

## **6. RIGHTS OF DATA SUBJECTS**

Pursuant to the Regulation and within the cases provided by the Regulation, Users may exercise the rights outlined in Articles 15 and following of the GDPR, including:

- **Right of access:** request confirmation from the Data Controller whether their data is being processed and, if so, access details about the processing;
- **Right to rectification:** request correction of inaccurate or incomplete data;
- **Right to erasure:** request deletion of data;
- **Right to restriction of processing:** request limitation of data processing;
- **Right to data portability:** request receipt of their data in a commonly used, machine-readable format or the direct transfer to another data controller, where technically feasible;
- **Right to object:** Users may also object, in whole or in part, for legitimate reasons and within the cases provided by the GDPR, to the processing of their data.

Without prejudice to any other administrative or judicial remedy, Users who believe that their data processing violates the GDPR have the right to lodge a complaint with the supervisory authority of the Member State where they reside, work, or where the



alleged violation occurred.

Users can exercise the above rights by:

- sending an email to [privacy@bec.energy](mailto:privacy@bec.energy);
- contacting the Data Protection Officer (DPO) at [dpo@eni.com](mailto:dpo@eni.com).