

PRIVACY POLICY – PROCESSING YOUR PERSONAL DATA

Pursuant to Regulation (EU) 2016/679 ('GDPR' or the 'Regulation'), Plenitude On The Road, as the user ('Plenitude On The Road' or the 'Data Controller'), wishes to provide the following information regarding the processing of personal data of Plenitude On The Road customers who have registered to use (the 'Registered Users') the loyalty programme called the 'Be Together Initiative' (the 'Programme'). Plenitude On The Road provides this information pursuant to the provisions of the Regulations and Italian Legislative Decree 196/2003 as amended and/or supplemented ('Italian Privacy Law').

1. DATA CONTROLLER

The Data Controller is Plenitude On The Road S.r.l., with registered office at no. 11 Via Carlo Bo, 20143 Milan (MI), which can be contacted via email at privacy@service.emob.eniplenitude.com

2. DATA PROTECTION OFFICER - DPO CONTACT DETAILS

Plenitude On The Road has appointed a Data Protection Officer, who can be contacted at dpo@eni.com.

3. PURPOSE, LEGAL BASIS FOR PROCESSING, NATURE OF PROVIDING DATA AND STORAGE OF PERSONAL DATA

Your personal data will be processed by Plenitude On The Road for the following purposes:

I. For the purposes of the Programme and in particular:

- to allow You to register for and participate in the Programme;
- to send You emails that are strictly related to the Programme (e.g., to receive discount codes, to provide You with status updates, etc.);
- to manage Your participation in prize draws launched as part of the Programme;
- to allow You to use any prizes (e.g., discounts on our products and/or services and/or those provided by partners, dedicated Initiative products and services, etc.).

The legal basis for processing is to provide You with the services connected with the Programme, as governed by the **Be Together Terms & Conditions** and by the rules of any prize draws which may be promoted by Plenitude On The Road from time to time.

You are not obliged to provide Your data, but to refuse to provide data will mean that You cannot participate in the Programme or in individual prize draws.

Your data will be stored for 10 years from de-registration, pursuant to the terms set out by the applicable regulatory framework on limitations.

II. To send You email communications with information and offers relating to the Programme (e.g., new prize draws, new prizes available and new Programme partnerships).

- The legal basis for processing is Plenitude On The Road's legitimate interests in guaranteeing that You are always informed on advantages and new initiatives relating to the Programme.
- Your data will be stored until You register an objection to processing.
- In any case, You may at any time request to no longer receive these communications (opt-out), by clicking on the appropriate link contained in each communication issued by Plenitude On The Road.
- The request referred to in the previous paragraph will not prevent Plenitude On The Road from performing marketing activities relating to future initiatives, based on consent provided by You as a Plenitude On The Road Customer.

III. Fulfilling obligations set by legislation, regulations and supervisory authority provisions.

The legal basis for processing is so that Plenitude On The Road can fulfil its legal obligations as Data Controller and Promoter of the Programme.

IV. Establishment, exercise or defence of a Plenitude On The Road right or a third-party right, in particular those for managing complaints, disputes, legal action and/or transactions.

The legal basis for processing is the legitimate interests of Plenitude On The Road and/or of third parties relating to the right to defend and protect the rights and interests of Plenitude On The Road and/or of third parties.

V. Statistical analysis

Your personal data will be processed to study aggregate statistics that are relevant to or pertinent to the activities performed by Plenitude On The Road as part of the Programme. The legal basis for processing is Plenitude On The Road's legitimate interests in studying the performance of the Programme, to improve its characteristics based on user interactions.

4. SCOPE OF COMMUNICATION AND RECIPIENTS OF PERSONAL DATA

Your personal data will be processed, for the above reasons, by staff within Plenitude On The Road who are expressly authorised and trained to process personal data. Your personal data may also be communicated for the above reasons to the following entities:

- entities that perform services on behalf of Plenitude On The Road, appointed Data Processors (e.g., ICT service providers or providers of services as part of the Programme);

- public-sector or private-sector entities (e.g., insurance companies, banks, legal consultants, public authorities, law enforcement agencies, tax agencies), which will process them as autonomous Data Controllers.

5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

If it is deemed instrumental to the pursuit of the purposes indicated in section 3, Your personal data may also be transferred abroad to a company with offices outside the European Union. Some of these jurisdictions may not guarantee the same level of data protection guaranteed by the country in which a data subject resides. In this case, Plenitude On The Road undertakes that personal data will be processed with the utmost confidentiality. Where necessary, Plenitude On The Road will conclude agreements which guarantee a suitable level of protection and/or will adopt standard contractual clauses set out by the European Commission

6. YOUR RIGHTS AS A DATA SUBJECT

Pursuant to the Regulation and in the cases set out in it, You may exercise Your rights as referred to in Articles 15 et seq. of GDPR. In particular, You have:

- **the right of access:** the right to obtain from the Data Controller confirmation as to whether or not personal data concerning You are being processed, and, where that is the case, access to information regarding processing;
- **the right to rectification:** to ask the Data Controller to rectify inaccurate personal data concerning You;
- **the right to erasure:** to ask the Data Controller to erase data concerning You;
- **the right to restrict processing:** to ask the Data Controller to restrict processing of data concerning You;
- **the right to data portability:** to ask the Data Controller to receive the personal data concerning You, in a commonly used and machine-readable format, or to transmit those data to another Data Controller, where technically feasible;
- **the right to object:** You also have the right to object in whole or in part, for legitimate reasons and in the cases set out in GDPR, to the processing of data concerning You.
- Finally, if You believe that the processing of data provided by You violates personal data protection legislation, You have the right to lodge a complaint with Autorità Garante [Italian Data Protection Authority] (information on this matter is available at www.garanteprivacy.it).

You may exercise the rights listed above by:

- sending an email to privacy@service.emob.eniplenitude.com ;

- contacting Plenitude On The Road Customer Service on +39 0230329064 or at servizioclienti@service.emob.eniplenitude.com ; or
- by contacting the DPO