

PRIVACY POLICY

WHY THIS POLICY STATEMENT?

This document is used to provide users accessing the www.axians.it website with information regarding the processing of their data.

The Privacy Policy has been prepared in accordance with the Regulation EU No. 679/2016 and subsequent additions and amendments, including the Recitals of reference and the Guidelines of the Working Group ex art. 29, also in relation to the appropriate requirements for the collection of data online in the European Union, and represents the Information to Data Subjects pursuant to art. 13 of the General Data Protection Regulation (GDPR) and the applicable national legislation in the field of Privacy.

WHO IS THE DATA CONTROLLER

The Data Controllers, who may determine -independently or jointly- the purposes and means of the same, are the companies:

- VINCI Energies Italia srl, Via Gallarate, 205 20151 Milan P. IVA 05966260969 capital stock: 100,000.00 pec: vincienergiesitalia@pec.netorange.it

Registration number (index of economic and administrative information): MI-186227

- AXIANS ITALIA spa, Via Gallarate, 205 20151 Milan P.IVA 02341030241, share capital: 2,000,000.00, pec: axiansitalia@pec.it

Registration number (index of economic and administrative information): MI-2507713

Axians has formally appointed its Data Protection Officer (DPO) who can be found at: dpo@axians.it.

The above companies are legally distinct from each other, but Vinci Energies Italia S.r.l. is the sole shareholder of Axians Italia S.p.a.

They carry out some activities jointly, sharing choices about the purposes and methods of processing, specifically with reference to the processing of personal data in relation to the "Marketing and Communication" sectors, Vinci Energies Italia S.r.l. deals directly with that purpose, with the help of Axians.

WHAT DATA IS PROCESSED

The data processed are browsing data and data spontaneously provided by the user, of any way it is only and exclusively personal data.

For this purpose, it is clarified that the Data Controllers do not require and do not process any particular health and/or judicial data of the interested party and therefore, please do not release any kind of information of this nature, as Axians and Vinci Energies, will provide immediate deletion.

Browsing data: Axians Italia S.p.a. and Vinci Energies S.r.l. (owner of the website)

Data controllers recognize the importance of the privacy of its users and is committed to respecting it.

The acquisition of navigation data takes place automatically and unavoidably; they may be used for the sole purpose of obtaining statistical information on the use of the website and to verify its proper functioning.

The computer systems and software procedures used to operate this website 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 its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the

server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

Data provided directly by the user

Data Controllers collect and processe Personal Data provided voluntarily by individual Users.

This category includes all Personal Data provided voluntarily by the User, for example, to participate in surveys, register for marketing events, or, in general, by filling out contact forms.

Such Data will be used only for the purpose and for the time strictly necessary to fulfill the individual User's request, unless the data subject requests cancellation, opposition and/or return.

WHAT ARE THE PURPOSES AND LEGAL BASES OF THE PROCESSING?

Navigation Data: purposes and legal bases

Browsing Data are used to obtain anonymous statistical information on the use of the website, for website security purposes and to check its proper functioning, and could be used to ascertain responsibility in the event of any computer crimes against the website.

The legal basis for the processing of such data is legitimate interest or consent - in cases provided by law - and, in the case of requests by the Authorities, legal obligation.

For the use of cookies or pixels for specific purposes, please refer to the cookie policy that can be consulted from the footer of the site.

Data provided directly by the user: purposes and legal bases

The personal data provided by the user in an optional way are used only to carry out any requests made and to execute the legal obligations and/or contractual obligations arising from the relationship in the case constituted, or, with prior consent, for marketing purposes as better specified in the Privacy Policy Contact Form.

The legal bases for the processing of such data are therefore: consent, legal obligation and the execution of pre-contractual and contractual obligations.

HOW IS THE DATA HANDLED?

The data collected are processed by computer and only residually by paper means. Adequate security measures are taken to prevent data loss, illicit or incorrect use and unauthorized access.

Data conferred directly by the data subject are kept for as long as is strictly necessary to process his or her requests.

In cases of registration for events or initiatives (against which data may be kept for the duration of the relationship and in accordance with legal obligations) and defensive needs (which may require further storage), data will be kept in relation to the obligations imposed by legislation.

With reference to activities concerning marketing, surveys and any purpose that involves a request for explicit, legitimate and optional consent, the data will be retained for a maximum time of 24 months, unless the data subject explicitly and prior to the deadline requests for deletion, opposition and/or return by the data subject.

Regarding navigation data, data acquired through services that use cookies and similar tools, please refer to the cookie policy of these services.

For data processing related to website services, the owner uses servers located within the European territory.

The use of some services may involve the transfer outside the EEA, which, however, takes place in compliance with the necessary guarantees provided by current legislation.

WHO CAN KNOW THE DATA?

The data will be processed by employees and collaborators of AXIANS /or Vinci Energies Italia S.r.l., in relation to the purposes already listed as Data Processors and specially instructed by the Companies for this purpose or, where appropriate, appropriately appointed as Data Processors.

The data may be processed by trusted companies that perform tasks of a technical and organizational nature on behalf of the data controllers. These companies are direct collaborators of the data controllers and are appointed, in accordance with the law, Data Processors and offer the necessary guarantees so that the processing of personal data complies with the Regulations and ensures the protection of the rights of the data subject.

The data subject may request the list of external parties carrying out their activities as data controllers by contacting the contact points already mentioned in the introduction.

WHAT ARE THE RIGHTS OF THE DATA SUBJECT?

The law recognizes the data subject's right to request from the data controller access to and rectification or erasure of the personal data concerning him or her or to object to their processing, as well as the right to data portability, pursuant to Articles 15-22 of EU Regulation 2016/679.

For the exercise of your rights, you may send a communication to the addresses already mentioned in the introduction, also using the inherent template available on the website of the Guarantor Authority.

The rights recognized by the current legislation on the protection of personal data are detailed below.

Right to withdraw one's consent: where applicable, the User has the right to withdraw his or her consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

Right of access, rectification and erasure: you have the right to request access to and receive a copy of your personal data in our possession, to request correction of any inaccurate data, and to request erasure of your personal data in special circumstances.

Right to data portability: in certain circumstances, you have the right to receive all personal data you have provided to us in a structured, commonly used, computer-readable format; you may also ask us to transmit such data to another Data Controller where this is technically feasible.

Right to object to justified processing based on legitimate interests: in cases where our processing of personal data is based on legitimate interests, you will have the right to object to such processing. If you object to such processing, we will be required to stop processing, unless we can demonstrate the existence of urgent legitimate grounds that outweigh your interest, rights and freedoms or where it is necessary for us to process such data to initiate, enforce or defend legal action. In cases where we rely on our legitimate interest as a justification for processing, we believe we can demonstrate such legitimate grounds, but each case will be examined on an individual basis.

Right to object to processing for marketing purposes: in cases where personal data is processed for marketing purposes, you have the right to object to such processing at any time.

In any case, the data subject has the right to lodge a complaint with the competent supervisory authority, i.e. the Data Protection Authority if he or she believes that his or her personal data have been processed unlawfully.