

PRIVACY POLICY

MyChange for AFID Members

Pursuant to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data ("GDPR"), Eni Corporate University S.p.A., (hereinafter the "Company" or the "Data Controller") informs you that the Personal Data provided by you, instrumental to and necessary for the use of "My Change" services ("Services") in accordance with the provisions of the General Terms and Conditions of Use ("T&Cs") of the Services, shall be processed in compliance with the GDPR and the related confidentiality obligations, and in any case in accordance with the purposes and means set forth below.

1. To whom am I providing my Data?

To Eni Corporate University S.p.A., C.F.12561370151, with registered office in San Donato Milanese (MI), Via S. Salvo, No. 1, which acts as data controller, pursuant to art. 4, n. 7) GDPR ("Data Controller") in the provision of the Services.

2. A chi Can I request information about the processing of my Data?

Information on how the Company, as Data Controller, processes personal data relating to you ("Personal Data") may be requested by writing to the Company at the contact details in paragraph 1 or by writing to the Company's appointed Data Protection Officer at dpo@eni.com.

3. For what purposes is my Personal Data processed?

The processing of your Personal Data takes place:

- a. to fulfill legal obligations imposed by the applicable laws and regulations (the legal basis for this processing purposes is the compliance with a legal obligation to which the Data Controller is subject to under art. 6, para. 1, let. c) GDPR);
- b. to allow you to access Service and to subsequently allow you to use them and, in particular, to enable you to take advantage of educational services provided, to participate in webinars and initiatives, to obtain certifications and attestations, as detailed by the T&Cs. For the aforementioned purpose, Personal Data will also be processed to administer and managing the Services, to provide you with customer support, as well as to comply with obligations arising under the T&Cs, as well as to fulfill your specific requests. In general, when the Company needs to get in touch with you for purposes related in any way to the Services requested, it will use the least intrusive, but nevertheless appropriate means to achieve the purpose (the legal basis for this processing purposes is the performance of a contract to which the data subject is party under art. 6, para. 1, let. b) GDPR);
- c. to conduct, on an aggregate basis, analyses on the Services usage with the purpose of improving them and of meeting specific customer needs (the legal basis for this processing purposes is the legitimate interests pursued by the Data Controller under art. 6, para. 1, let. f), GDPR in continuously improving the efficiency and security of its Services. This legitimate interest of the Data Controller has been appropriately balanced with the rights and freedoms of data subjects, including You, by managing the mentioned analyses through aggregated information); and
- d. in the context extraordinary mergers, sale or transfer of business operations, to enable the necessary due diligence activities as well as in case of defense of a right in court and

in connection with related prodromal activities (the legal basis for this processing purposes, in case, will be the legitimate interests pursued by the Data Controller under art. 6, para. 1, let. f), in continuing its business activities and in protecting its rights).

e.

Please note that, with reference to the processing activities under para c. above, reports on the services usage (e.g. on the courses in which you were enrolled, the duration and category of such courses, as well as whether the courses were completed) may be shared with the Afid Member company you work for/collaborate with that, in this, will act as autonomous data controller.

4. Is the provision of my Personal Data mandatory? what happens if I do not provide it?

The provision of your Personal Data for the purposes outlined in paragraph 3 is mandatory and failure to provide will prevent the Company from providing you with the Services.

5. How is my Data processed?

The processing of the Data may also take place through electronic or automated means, managed by tools suitable to guarantee their security and confidentiality, and will include any operation or set of operations necessary for the processing itself. In any case, your Personal Data is processed by personnel duly authorized by the Data Controller to process such Data.

6. Who are the entities that access my Personal Data?

Your Personal Data may be communicated by the Data Controller, in addition to the competent Authorities, where required or mandatory by law, to the following categories of recipients, exclusively for the purposes indicated in paragraph 3 above:

- a. Eni S.p.A. and other companies controlled by Eni S.p.A. for the support and management of the Services;
- b. professional and consulting firms appointed to participate in ordinary and litigation management;
- c. companies that provide IT services, including IT support for MyChange;
- d. companies that support the management and delivery of the Services offered through MyChange; and
- e. with the Afid Member company you work for/collaborate with for the purposes specified in the last sentence of paragraph 3 above.

The Data, however, will not be disseminated. With reference to the Data communicated to them, the aforementioned recipients may operate, as appropriate, as data processors (and in this case they will receive appropriate contractual instructions from the Data Controller) or as autonomous data controllers. For more information, you may contact the Company at the references above.

We guarantee that we take the utmost care to ensure that the communication of your Personal Data to the aforementioned recipients involves only the data necessary to achieve the specific purposes for which they are intended.

Where this is instrumental to the pursuit of the purposes set out in paragraph 4, Data may also be transferred abroad to companies based outside the European Union. Some of these jurisdictions may not guarantee the same level of Data protection as the country in which the Data Subject resides. In such a case, the Data Controller is committed to ensuring that the Data is treated with the utmost confidentiality by entering into agreements, where necessary, that guarantee an

adequate level of protection and/or by adopting the standard contractual clauses required by the European Commission.

7. How long will my Personal Data be stored?

Your Personal Data will be stored in the Data Controller's database and protected by appropriate security measures for the time it takes to achieve the objectives mentioned in paragraph 3, and will then be deleted. Your Personal Data may be retained for a later period in the event of any litigation, requests from the relevant authorities or under applicable law.

8. What are my Personal Data protection rights?

As the data subject, you have the following rights in relation to your Personal Data collected and processed by the controller for the purposes set out in paragraph 3:

- obtain from the Data Controller confirmation as to whether or not your Personal Data are being processed, and where this is the case, access to the following information: *(i)* the purposes of the processing; *(ii)* the categories of Personal Data being processed; *(iii)* the recipients or categories of recipients of the Personal Data to whom the Personal Data have been or will be transferred, specifically recipients in third countries or international organisations; *(iv)* where possible, the envisaged period for which the Personal Data will be stored, or if not possible, the criteria used to determine that period; *(v)* the right to lodge a complaint with a supervisory authority; *(vi)* where the Personal Data were not collected from you, any available information about their source; *(vii)* the existence of automated decision-making, including profiling, and information about the logic involved and the envisaged consequences of such processing for you;
- obtain the rectification of inaccurate Personal Data, or, taking into account the purposes of the processing, supplement incomplete Personal Data;
- obtain the erasure of your Personal Data where one of the following grounds applies: *(i)* the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; *(ii)* the Personal Data have been unlawfully processed; *(iii)* you have withdrawn consent on which the processing is based and there is no other legal ground for the processing; *(iv)* you object to the processing and there are no overriding legitimate grounds for the processing; *(v)* the Personal Data have to be erased for compliance with a legal obligation. The company has the right to not apply the above to the extent that processing is necessary: (a) for compliance with a legal obligation or for the performance of a task carried out in the public interest; or (b) for the defence of legal claims;
- obtain restriction of processing of the Personal Data where one of the following applies: *(i)* you have contested the accuracy of the Personal Data, for a period enabling the controller to verify the accuracy of the Personal Data; *(ii)* the processing is unlawful and you oppose the erasure of the Personal Data; *(iii)* they are required by you for the establishment, exercise or defence of legal claims; *(iv)* for the period necessary to verify whether the legitimate grounds of the controller override those of you as the data subject;
- receive your Personal Data, which you have provided to the Data Controller in a structured, commonly used and machine-readable format. You also have the right to transmit those data to another controller without hindrance;

- object, on grounds relating to your particular situation, at any time to processing of Personal Data (including segmentation) performed on the basis of the Data Controller's legitimate interest.

These rights can be exercised by writing to the company at the address provided in paragraph 1 or by emailing the data protection officer (DPO) appointed by the company at dpo@eni.com.

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with the competent supervisory authority, if you consider that the processing of Personal Data relating to you infringes your rights in relation to Personal Data protection. More information is available at the following link https://edpb.europa.eu/about-edpb/board/members_en.

Version of 25/08/2023