

## **Privacy Policy**

This statement is addressed to all those who visit and interact with the website of STE Energy S.r.l. (hereinafter also referred to as the "Company") and is provided only for this website and not for other websites that may be visited by the user through links contained in this site. The Company shall not be liable in any way for any unlawful processing of your data carried out by third parties. Therefore, for the exercise of the rights referred to in the paragraph "Rights of the data subject", please refer to the specific statement that shall be provided to you each time by these third parties as independent Data Controllers.

This statement is also based on Recommendation no. 2/2001 that the European Authorities for the protection of personal data, in the Working Party established by Article 29 of Directive no. 95/46/EC, adopted on 17 May 2001, in order to identify some minimum requirements for collecting personal data online, and, in particular, the methods, timeframes and nature of the information that data controllers must provide users when they visit web pages, regardless of the purposes of such visit. Specific policies on the processing of your personal data will be further reported or displayed on the web pages prepared for particular services on request. The Company will process your personal data in compliance with the provisions of Regulation (EU) 2016/679 of 27 April 2016 - General Data Protection Regulation (hereinafter, the "Regulation").

### **Processed data**

#### **Data provided by the user**

The data provided by the user through the voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Such data will be processed - if deemed relevant and necessary - to process the requests sent by the user. If (and only if) it is necessary to fulfill the user's requests, the Company may request to provide further data in addition to those collected so far. Personal data is processed to fulfil pre-contractual, contractual and legal obligations. If the data communicated is not considered relevant and necessary to provide the requested service, our Company reserves the right, at its sole discretion, to delete such data.

## **Newsletter**

The Newsletter of the Company is published on the Company website and distributed via e-mail - automatically and free of charge - to those who request to receive it by filling out the form provided. The data provided will be used with IT and telematic tools for the sole purpose of marketing and networking and, for this reason, will be kept exclusively for the period in which it will be active. The data will be processed exclusively by the staff and collaborators of the Company. The interested parties have the right to obtain from the Company, in the cases provided for, access to personal data and the correction or cancellation of the same or the limitation of the processing that concerns them or to oppose the processing (articles 15 and following of GDPR). The appropriate application to the Company is presented by contacting the Data Protection Officer at the Company (email: [privacy@ste-energy.com](mailto:privacy@ste-energy.com)). Interested parties who believe that the processing of personal data referring to them carried out through this service is in violation of the provisions of the GDPR have the right to present a claim to the Company.

**CANCELLATION OF THE SERVICE.** To stop receiving the newsletter, enter your e-mail address in the form on the website or click on the "Unsubscribe" button. In case of technical problems, it is possible to send an e-mail report to: [comunicazione@ste-energy.com](mailto:comunicazione@ste-energy.com).

### **Browsing data**

During normal browsing, computer systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of internet communication protocols. Such information is not collected in order to be associated with identified data subjects, but by their nature could allow users to be identified through processing and association with data held by third parties. This category of data includes IP addresses or domain names of computers used by users who connect to the site, URI ("Uniform Resource Identifier") addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters relating to the operating system and computer environment of the user. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its proper functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this circumstance, currently the data on web contacts is not retained for more than 24 months.

### **Cookies**

Cookies are not used for the transmission of personal information, nor are so-called persistent cookies of any kind, or systems for tracking users. The use of the so-called session cookies (which are not permanently stored on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow the safe and efficient browsing of the website. The so-called session cookies used in this site avoid the use of other IT techniques that may potentially affect the confidentiality of users' web browsing and do not allow the acquisition of personal identification data of the user.

### **Consequences in case of failure to provide data and/or consent to processing**

Apart from the above-specified browsing data, the user is free to provide his personal data. However, failure to provide personal data might make it impossible for our Company to respond and comply with the requests sent by the user. Individuals or categories of individuals to whom data may be communicated and scope of dissemination of data.

### **The data will not be disseminated**

The data will be accessible – solely for the purposes indicated in the specific sections, also in order to guarantee their constant accuracy and updating – to the employees and collaborators of the Company in charge of processing. The data will also be accessible to STE Energy's group companies that provide centralized services for our Company. Lawyers and law firms may also be provided with the necessary data to verify compliance with the regulations applicable to the existing relationship and/or to assert a right of the Data Controller also in the course of legal proceedings. Third parties in charge of the maintenance/development of this website and of our IT system will also be able to access the data, but solely for the time strictly necessary to perform such service.

### **Duration of data processing**

Our Company will store the data for the period strictly necessary to process the user's request - without prejudice to the need to retain data for a longer period in compliance with applicable legislation, including accounting regulations, and/or for the time necessary to enforce a right of the Data Controller also in the course of legal proceedings. At the end of this period, the data will be deleted and/or made anonymous.

## **Data Controller**

The Data Controller is STE Energy S.r.l. with registered office in Padua – 35141, Via Sorio n. 120, Italy, which may be contacted, also to exercise the rights referred to in the paragraph below, at the following e-mail address: [privacy@ste-energy.com](mailto:privacy@ste-energy.com).

## **Rights of the Data Subject**

The Data Subject has the right to request from the Company:

- access to, rectification, cancellation or limitation of data processing, as well as to object to the processing, pursuant to articles 15-18 and 21 of the Regulation;
- the data portability, pursuant to art. 20 of the Regulation.

The Data Subject also has the right to lodge a complaint with the Italian Data Protection Authority.

Here below is the full text of the articles cited in this paragraph and related to the rights of the data subject referred to in the GDPR.

## **Article 15**

### **Right of access by the data subject**

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source;
- (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

## **Article 16**

### **Right to rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

## **Article 17**

### **Right to erasure ('right to be forgotten')**

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall

have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

(e) for the establishment, exercise or defence of legal claims.

## **Article 18**

### **Right to restriction of processing**

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

(a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

(b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

(c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

(d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

## **Article 20**

### **Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

(a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and

(b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

## **Article 21**

### **Right to object**

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.



5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.