

PRIVACY POLICY

Pursuant to artt. 13 and 14 Reg. 2016/679

Edison Suppliers

Edison Spa and Edison's Group companies (hereinafter referred to as "Edison"), informs that, pursuant to Articles 13 and 14 of the General Data Protection Regulation, n. 2016/679 ("Regulation" or "GDPR"), and Italian Legislative Decree 196/03 ("Privacy Code"), the personal data provided by the subjects indicated below in this text, with regard to the purposes of Processing under point 4 below, will be processed in compliance with the provisions set forth in the Regulation, and for the following purposes.

1. Data source

The personal data that are being processed are directly collected both from data subjects, and from the data subjects' employer (suppliers/applicants) from the "Supplier Qualification Portal" restricted area in Edison's website during the negotiations or the execution of the contract.

2. Data subjects

This Privacy Policy applies to:

- All suppliers/applicants who are natural persons
- Suppliers' and/or applicants' employees.

In the following part of the note, the above-mentioned natural persons are referred to as "**data subjects**" of the processing of personal data.

3. Categories of processed data

Data subject to processing are: personal data (biographical, contact and credit data), health data (job eligibility) and criminal records.

4. Purposes, legal basis of Processing and data retention period

The personal data collected on the Edison's supplier qualification portal will be processed for the following purposes:

A) Purposes of processing, whose legal basis are contractual or pre-contractual activities

1. In order to request documentation on the employees with regard to activities which may require specific certifications or pre-requisites.
2. In order to evaluate the requirements and conditions needed to implement the contract making process

B) Purposes of processing, whose legal basis is a legal duty

1. In order to evaluate the moral integrity and the financial reliability of applicants;

C) Purpose of processing whose legal basis is the legitimate interest of Data Controller

1. In order to carry out any credit assessments prior to the conclusion of the contract and also carried out during the qualification phase, also with consultation of SIC (Credit Information System). Please refer to the appropriate Information - SIC Privacy Policy -.
2. In order to transfer the data to other Data Controllers, in case of due diligence operations and for any subsequent sale of Business Unit or Group Companies to other Companies outside the Edison Group.

A specific retention period has been defined for the different types of treatments of the data. This period is, for the purposes indicated above, 10 years starting from the date of the last data update (in case of non-contractualization) or from the date of termination of the contract.

3. Processing methods

With regard to the purposes described above, data will be either digitized (IT and telecommunications tools) or processed on hard copy; in any case adequate tools will be used to guarantee safety, confidentiality, integrity and availability of the same data according to the requirements under the Regulation.

4. Categories of Data receivers

Personal data of the Data Subject will only be disclosed to people who have been authorized and duly instructed by the Data Controller or Data Processors in point 8, i.e. employees in charge of relations with the parties concerned referred to in the point 2, except as required by law.

5. Circulation of data

The personal data of the Data Subject will under no circumstances be disseminated without the consent of the data subjects, except as provided for under national law.

6. Data Controller and Data Processor

The Data Controllers, namely the subjects determining the purposes of processing, are Edison Spa and other Group companies, with whom data subjects are willing to negotiate a contract or already have a contractual arrangement. The Data Processor, namely the subject processing data on behalf of the Data Controller, are service providers who have been appointed by the Data Controller pursuant to Regulation 2016/679.

7. Data Protection Officer

The Data Protection Officer, who shall ensure the rights of data subjects pursuant to the Regulation, has been chosen to be a common reference point for all companies which are managed, coordinated or controlled by Edison Spa. The contact details of the DPO can be found below in this note (article 10).

8. Exercise of rights

Pursuant to Regulation 2016/679, the data subject shall be granted in any moment full access to his/her personal data, shall receive confirmation of their existence, have full knowledge of their content, origin, location, and shall be able to request a copy.

Furthermore, the data subject shall have the right to verify their accuracy, or to have incomplete personal data completed, updated or rectified; to the restriction, erasure, transformation into anonymous form of processed data, as well as to the erasure if personal data have unlawfully been processed or to object to their processing. The opposition to the treatment relating to the purpose described in paragraph 4, exercised by automated methods, also extends to traditional methods, except in any case the right to exercise that right only in part. The data subject shall also have the right to data portability and to lodge a complaint to a supervisory Authority.

The data subject can exercise his/her rights by contacting the Data Protection Officer (DPO) by using the following tools:

Ordinary e-mail privacy@edison.it

Pec e-mail privacy.gruppoedison@pec.edison.it

Address DPO c/o EDISON S.p.A., Foro Buonaparte 31 – 20121 - Milano

ATTACHED SIC SUPPLIERS – INFORMATION ON THE PROCESSING OF PERSONAL DATA IN RELATION TO THE CREDIT INFORMATION SYSTEM

How we use your data

This Policy, based on art. 13 and 14 of EU Regulation 679/2016 is also made on behalf of credit information systems, and constitutes the completion of the Information relating to the Processing of your personal data already provided to you and available on the Edison S.p.A. Supplier Qualification Portal. Edison S.p.A., as Data Controller, informs you that to follow up your request for qualification on this portal, some data concerning you will be used. This is information that you yourself provide to us or that we obtain by consulting some databases. These databases (Credit Information System or SIC) containing information about the data subjects are consulted to evaluate, take or manage a credit risk, to assess the reliability and punctuality in the payments of the data subject and are managed by individuals and participated by private entities belonging to the categories that it will find in the information provided by the managers of the SICs. This information will be stored with us.

The processing and communication of your data is a necessary requirement for the qualification process and the subsequent conclusion of the contract. Without this data, we may not be in condition to follow up the procedure. The retention of this information by the databases is carried out on the basis of the legitimate interest of the **Data Controller in consulting the SIC.**

Treatment carried out by our Company

Your data will not be transferred by us to a non-EU third country or an international organization. According to the terms, modalities and limits of applicability established by current legislation, you have the right to know your data and to exercise the different rights related to their use (correction, updating, deletion, limitation of processing, opposition, etc.). You may lodge a complaint with the Privacy Authority for the Protection of Personal Data (www.garanteprivacy.it), as well as resort to the other means of protection provided for by the applicable legislation. We keep your data with our company for as long as necessary to manage your contractual relationship and to comply with legal obligations (for example, with the provisions of Art. 2220 of the Italian Civil Code regarding the retention of accounting records).

For any request regarding your data, use in your interest the tools also indicated in point 10 of the Personal Data Processing Policy available on the Supplier Qualification Portal. You can exercise your rights by contacting the Data Protection Officer of the Edison Group by:

- sending an email to privacy@edison.it, or
- send a written communication to the DPO of Edison S.p.a., Foro Buonaparte 31 - 20121 - Milan, or
- sending an email to privacy.gruppoedison@pec.edison.it

Your data may not be used in the automated decision-making process of a request in the event that such a decision is necessary for the conclusion or execution of your contract with us.

Treatment carried out by the SIC Manager

In order to better assess credit risk, as well as reliability and punctuality in payments, we communicate some data (personal data, also of the person who may be co-imposed, type of contract, amount of credit, method of reimbursement) to Credit Information System systems, which are regulated by the relevant Code of Conduct and which are qualified as Data Controllers. The data are made accessible to the different private subjects belonging to the categories that you will find in the Information policy provided by the SIC managers, available through the channels listed below. Your data are updated periodically with information acquired during the contract (payment trends, residual debt exposure, status of the report). Within the SICs, your data will be processed according to methods of organization, comparison and processing strictly indispensable to pursue the purposes described above.

Your data are *not* the subject of special statistical processing by Edison in order to give you a summary judgment or a score on your degree of reliability and solvency (*credit scoring*). Some additional information may be provided to you in the event of non-acceptance of your request.

The SICs to which we adhere are managed by:

IDENTIFYING DETAILS: **CRIBIS D&B S.r.l.**

CONTACT DETAILS: **VIA DEI VAL TORTA 48 - 20127 MILAN, 0514175084; E-mail: dirprivacy@crif.com; PEC: crif@pec.crif.com.**

TYPE OF SYSTEM: **positive and negative**

DATA RETENTION: **these times are shown in the table below**

USE OF AUTOMATED CREDIT SCORING SYSTEMS: **yes**

EXISTENCE OF AUTOMATED DECISION-MAKING: **no**

You have the right to access your data at any time. Contact our Company, sending a communication to the Data Protection Officer, or to the managers of the SICs, to the contact details indicated above. In the same way it may request the correction, updating or integration of inaccurate or incomplete data, or the deletion or blocking for those processed in violation of the law, or even oppose their use for legitimate reasons to be highlighted in the request (Art.15 to 22 of the EU Regulation excluding Art. 20).

Data retention period in SIC system:

KIND OF DATA

Funding requested and being evaluated

Funding requests gave up/rejected

Funding regular refunded

1 o 2 instalment (or monthly payments) paid late

3 or more instalment (or monthly payments) paid late even on a transaction

Not refunded funding (i.e. unpaid negative events, default, serious breach, economic suffering)

DATA RETENTION

180 days from requested data

90 days from the date of update with the result of waiver/rejection

60 months from the date of actual termination of credit report, i.e. from the first update made in the month following that date (in case of coexistence of reports with positive events and other reports with unregularized negative events, it applies the retention period for reports with negative events)

12 months from regularization notes, provided that in 12 monthly the payments are always regular

24 months from regularization notice, provided that in the 24 months the payments are always regular

36 months from expiration date of the contract or from the date on which the Participating Institution provided the latest update (in case of subsequent agreements or other relevant events in relation to the refund) and in any case up to 60 months from the expiration date of the contract, as shown in the same.