PRIVACY POLICY

WHO WE ARE

The Veolia Italia Group (hereinafter the "**Group**")[1], through this Privacy Policy (hereinafter referred to as the "Privacy Policy"), aims to inform the data subjects (hereinafter referred to as the "**Data Subjects**")[2] regarding the terms of protection of their personal data pursuant to Legislative Decree 101/2018 and EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter collectively referred to as the "**Legislation**"). The Group companies are the data controllers of the personal data collected and managed as indicated below.

WHAT PERSONAL DATA ABOUT YOU CAN BE COLLECTED

The following categories of personal data about you can be collected:

- **Contact Data** – information relating to your name, place and date of birth, tax identification number, address, telephone number, mobile phone number, email address.
- **Interests** – information you provide us regarding your interests, including products you are interested in.
- **Other Personal Data** – information you provide us regarding your education or professional situation.
- **Website Usage** – information relating to how you use the website, open or forward our communications, including information collected through cookies (you can find our Cookie Policy which regulates the details).
- **Data relating to commercial and/or business relationships** – information and data necessary for managing commercial relationships with suppliers, customers and partners, such as, for example, banking data.
- **Data relating to images** – information consisting of images and video recordings acquired: i) through video surveillance systems installed at the Group's offices, local units and sites (for processing details see specific information notice); ii) in the case of public institutional events.

HOW WE COLLECT YOUR PERSONAL DATA

The Group collects and processes your personal data in the following circumstances:

- if you register through the "Contacts" form on the website;
- if you contact us to request assistance, including by using our call center services;
- if you respond to our marketing campaigns, for example by filling out a response form, or by entering data on this website in the appropriate "Contacts" section;

[1] The "Veolia Italia Group" is composed of Veolia Italia S.p.A. as the parent company and the controlled companies, as well as affiliated companies for which services are provided that involve the processing of personal data.

[2] "Data Subjects" means all natural persons who access the website or who have commercial, business and/or professional relationships with Veolia Italia and/or with the companies of the Veolia Italia Group, as well as those who have participated in events organized by Veolia Italia and/or by one of the companies of the Veolia Italia Group.

- if you participate in our Corporate Social Responsibility ("CSR") activities;
- if you send us your *curriculum vitae*;
- if you propose yourself as a supplier or other third party, by filling out the form in the appropriate dedicated area or through registration on a dedicated portal;
- in the context of communications provided and/or exchanged during pre-contractual and/or contractual phases;
- if you participate in initiatives and campaigns promoted on *social networks* (for campaigns promoted through major *social networks*, please also see their privacy notices);
- if you participate in one or more events organized by the company and/or by Group companies, during which your personal data will be collected;
- if one or more Veolia Group companies or commercial partners legitimately transfer your personal data to another Group company.

If you provide personal data on behalf of someone else, you must ensure in advance that the data subjects have reviewed this Privacy Policy.

We ask you to help us keep your personal data up to date by notifying us of any changes.

FOR WHAT PURPOSES CAN YOUR PERSONAL DATA BE USED

The processing of personal data must be legitimized by one of the legal bases provided for by current legislation on the protection of personal data as described below.

a) Establishment and performance of contractual relationships and related obligations, including employment relationships and communication relating to services (for example to proceed with the provision of assistance services requested via call center).

The Group may process your Contact Data for the purpose of establishing contractual relationships with third parties, including employment relationships, for which reference is made to the specific information notice published in the appropriate section; as well as, subsequently, Data relating to commercial and/or business relationships for the management and performance of contractual relationships, including qualification activities, administrative and accounting management of such relationships, the provision of requested services and responses to complaints and claims. The Group may also use your contact data, and in particular your email and telephone contact, to provide you with information relating to the service.

If you use our call center service, the call may be recorded for the sole purpose of allowing the Group or the service provider company to analyze and manage the customer assistance services offered as provided for contractually. Access to such recording will only be possible for the purpose of customer assistance, ensuring an *Audio Recording Encryption system*.

Legal basis for processing: performance of contractual obligations.
Data provision is necessary to manage the pre-contractual and contractual relationship; without it we cannot proceed.

b) Operational management and purposes strictly connected to it for access to the website.

The Group collects your Contact Data and Website Usage data to allow you to access your Personal Area, both on the website and on any dedicated portals, in order to: (i) download from your Personal Area documents

relating to services you have purchased; (ii) carry out other requests made through the website and/or the dedicated portal.

Legal basis for processing: performance of contractual obligations.
Data provision is necessary to respond to your requests; without it we cannot proceed.

c) Customer Satisfaction Surveys.

The Group may use your Contact Data to conduct surveys aimed at measuring the level of satisfaction (*customer satisfaction*) of the service provided.

Legal basis for processing: (i) legitimate interest; (ii) performance of contractual obligations if the *customer satisfaction* survey is provided for contractually.
Data provision is necessary to respond to your requests; without it we cannot proceed.

d) Marketing to meet your needs and communication regarding promotional initiatives as well as institutional events.

The Group may process your Contact Data for marketing purposes and direct communication to inform you about promotional initiatives as well as institutional events; communication may be carried out through automated contact methods (email, SMS and other mass messaging tools, etc.) and traditional contact methods (for example, telephone call with an operator) or for market research and statistical surveys. The Group may also process your Contact Data and Other Personal Data to send you commercial communications in line with your preferences, based on a specific customer profile.

Legal basis for processing: legitimate interest.

e) Participation in Corporate Social Responsibility "CSR" activities (example *stakeholder engagement*)

The Group may process your Contact Data collected following your voluntary participation in CSR activities activated for statistical purposes and management of CSR activities, including the sending of informational emails.

Legal basis for processing: legitimate interest.

f) Compliance with legally binding requests to fulfill a legal obligation, regulations or orders from the judicial authority, as well as to defend a right in court.

The Group collects your Contact Data to fulfill a legal obligation and/or to defend its own right in court.

Legal basis for processing: legal obligations to which the relevant Group company is required to comply.

g) Receive commercial information following registration through the "Contacts" form on the website

The Group may process your contact data provided by you through registration on the "Contacts" form on the website to provide commercial information.

Legal basis for processing: consent.
Data provision is necessary for the processing indicated; without it we cannot proceed. Consent can be withdrawn at any time by contacting the relevant Group company.

h) Protection of health, safety and corporate asset protection

The Group processes personal data for the protection of people's health and safety, workplace safety, protection of corporate assets and verification of access rights.

Legal basis for processing: (i) legal obligations; (ii) legitimate interest of the controller, to the extent that such interests are not outweighed by the interests or fundamental rights and freedoms of the data subject.

i) Video surveillance for the purpose of protecting corporate assets and the safety of persons

Some Group companies, as provided for by current legislation, may carry out video surveillance activities at their offices and facilities for the purpose of protecting corporate assets and the safety of persons who access or work there.

Legal basis for processing: legitimate interest of the controller. The provision of data (your image) is necessary to access video-monitored premises.
For detailed information on the processing of personal data carried out through the video surveillance system, we invite you to consult the specific information notice published on our website.

j) Photo and video recordings in the case of public institutional events

The Group processes your images recorded during public institutional events in order to publish them on its website, on communication channels such as, for example, brochures, posters, informational catalogues, social network channels for illustrative purposes of its activities and/or for the promotion of a project.

Legal basis for processing: legitimate interest.

For detailed information on the processing of personal data carried out through video/photo recordings, we invite you to consult the specific information notice published in a dedicated section of the website.

HOW WE KEEP YOUR PERSONAL DATA SECURE

The Group uses a wide range of security measures to improve the protection and maintenance of the security, integrity and accessibility of your personal data.

All your personal data is stored on our secure servers (or secure paper copies) or those of our suppliers or commercial partners, and is accessible and usable based on our standards and security policies (or equivalent standards for our suppliers or commercial partners).

We adopt, among others, measures such as:

- strict restriction of access to your personal data, based on necessity and for the sole purposes communicated;

- perimeter security systems to prohibit unauthorized access from outside;

- permanent monitoring of access to information systems to identify and stop personal data abuse;

- tracing of access to your personal data made by internal staff and verification of the related purpose;

- TLS (Transport Layer Security) technology and HTTPS (Hyper Text Transfer Protocol Secure) protocol so that transactions on the website that require the entry of your personal data occur in an encrypted manner;

Where we have provided you (or you have chosen) a password that allows you access to the reserved areas of our website, applications or services provided by us, you will be responsible for the secrecy of such password

and for compliance with any other security procedures we have notified you of. We ask you not to share your password with anyone.

HOW LONG WE RETAIN YOUR INFORMATION

We retain your personal data only for the time necessary to achieve the purposes for which it was collected or for any other legitimate related purpose. Therefore, if personal data is processed for two different purposes, we will retain such data until the purpose with the longest retention period ceases; however, we will no longer process personal data for that purpose whose retention period has expired. We limit access to your personal data only to those who need to use it for relevant purposes. Your personal data that is no longer necessary, or for which there is no longer a legal basis for its retention, is irreversibly anonymized (and thus can be retained) or securely destroyed.

Below we report the retention periods in relation to the different purposes listed above:

a) Establishment of pre-contractual relationships and performance of contractual obligations: data processed for the establishment of pre-contractual relationships may be retained for a period not exceeding 5 years; data processed to fulfill any contractual obligation may be retained for the entire duration of the contract, to which any extensions must be added and in any case not beyond the following 10 years, in order to verify any outstanding matters including accounting documents (for example invoices), unless there are legal constraints.
Only in the case of data processing following the use of our call center services, any telephone call recordings may be retained for 12 months.

b) Operational management website access: data processed for this purpose may be retained for the entire duration of the contract and in any case not beyond the following 6 months..

c) Customer satisfaction survey purposes: data processed for this purpose may be retained for (i) 36 months from the date of response to the questionnaire; (ii) the time indicated in the previous letter a) in the event that customer satisfaction surveys are provided for contractually.

d) Marketing purposes and communication of promotional initiatives and institutional events: personal data processed for marketing purposes may be retained for 12 months (except for opposition to receiving further communications).

e) In the case of your participation in CSR activities promoted through the website: personal data processed for statistical purposes and management of CSR activities will be retained until the end of the project, in any case not beyond 24 months.

f) Compliance with legally binding requests to fulfill legal obligations, as well as in the case of disputes: in the event that it is necessary for us to defend ourselves or act or also advance claims against you or third parties, we may retain the personal data that we reasonably believe necessary to process for such purposes, for the time in which such claim can be pursued.

g) Request for commercial information following registration through the "Contacts" form on the website: personal data collected will be retained only for the time necessary to respond to the request for commercial information, not beyond 6 months; in the event that commercial relationships are established, reference is made to the specific point a).

h) Protection of health, safety and corporate asset protection: (i) as provided for by specific legislation on health and safety, including Legislative Decree 81/2008; (ii) as regards video surveillance, the legal basis for which is legitimate interest, the retention period is 48 hours (see next point).

i) Video surveillance: video-recorded images are retained for a maximum of 48 hours, except for special needs

for further retention in relation to holidays or office closures, as well as different and specific agreements with union representatives and in the event that a specific investigative request from the judicial authority or judicial police must be complied with.

j) Photo and video recordings in the case of public institutional events: your images will be retained on servers for a period of time not exceeding the publication period of the video recordings/photographs, subject to the needs connected with the creation of the historical archive.

WHO WE CAN SHARE YOUR PERSONAL DATA WITH

Your personal data may be accessed by duly authorized employees, as well as external suppliers, appointed, where necessary, as data processors, who provide support for the provision of services or who provide the platforms on which personal data is managed.

Your personal data may also be accessed by other Veolia Group companies, for purposes connected to the management of IT infrastructure, on the basis of specific contractual agreements or, with your consent, (see previous letter g) for the purpose of processing commercial information following registration through the "Contacts" form on the website.

CONTACTS

Below is the email address of the DPO of the parent company Veolia Italia S.p.A.: dpo.italia@veolia.com to which you can contact for any clarification regarding the processing of your personal data.

YOUR RIGHTS REGARDING DATA PROTECTION AND YOUR RIGHT TO LODGE COMPLAINTS WITH THE SUPERVISORY AUTHORITY

Under certain conditions you have the right to ask us for:

- access to your personal data,
- a copy of the personal data you have provided us (so-called portability),
- rectification of data in our possession,
- deletion of any data for which we no longer have any legal basis for processing,
- opposition to processing where provided for by applicable legislation,
- withdrawal of your consent, in the event that the processing is based on consent;
- limitation of the way we process your personal data, within the limits provided for by legislation protecting personal data.

The exercise of such rights is subject to certain exceptions aimed at safeguarding the public interest (for example the prevention or identification of crimes) and our interests (for example the maintenance of professional secrecy). In the event that you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to exercise it and we will provide you with a response, as a rule, within one month.

For any complaints or reports regarding the manner in which your data is processed, we will make every effort to respond to your concerns. However, if you wish, you may submit your complaints or reports to the data protection supervisory authority, using the relevant contact details:

Garante per la protezione dei dati personali
Piazza Venezia, 11 - 00187 ROME
Phone: (+39) 06.696771
E-mail: protocollo@gpdp.it - Certified e-mail: protocollo@pec.gpdp.it