

## **PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE PERSONS OF SUPPLIERS AND SUB-SUPPLIERS**

This notice is provided to the persons of suppliers and sub-suppliers, including their employees, collaborators and representatives, by the following companies in their role as Data Controllers:

- Italgas S.p.A. with registered offices at Via Carlo Bo no. 11, Milano
- Italgas Reti S.p.A., with registered offices at Largo Regio Parco no. 11, Torino
- Toscana Energia S.p.A., with registered offices at piazza E. Mattei no. 3, Firenze
- Medea S.p.A., with registered offices at loc. Predda Niedda, strada s.n. strada 1 angolo strada 2, Sassari
- Metano Sant'Angelo Lodigiano S.p.A., with registered offices at via Riccardo Morzenti no. 27, Sant'Angelo Lodigiano (LO)
- Umbria Distribuzione Gas S.p.A., with registered offices at via Bruno Capponi no. 100, Terni
- Nepta S.p.A., with registered offices at Via C. Bo 11, 20143 Milano
- Geoside S.p.A., with registered offices at Via Ettore Cristoni n. 88, Casalecchio di Reno (BO)
- Bludigit S.p.A., with registered offices at Via C. Bo 11, 20143 Milano

Each of the companies listed above acts as Data Controller of the personal data, as indicated in more detail in point 6 below (the "**Company**" or the "**Data Controller**").

We wish to inform you, pursuant to Art. 13 and 14 of European Regulation 679/2016 on the protection of personal data ("**Regulation**") and national legislation, including the individual provisions of the Italian Supervisory Authority (Garante per la protezione dei dati personali) where applicable, that the personal data referred to in point 1) below, which come into our possession for the purposes of registration, access and authorisation for use of the Italgas Group Supplier Portal, for the performance of activities aimed at the identification and qualification of suppliers, inclusion in the suppliers' vendor list, selection procedures, the entering into and implementation of contracts between Italgas Group companies and third parties - including management of the contractual relationship, storage of administrative and technical documentation and related further fulfilments -, will be processed in compliance with the legislative and contractual provisions in force for the purposes and in the manner indicated below.

In addition to during the qualification process, entering into and implementation of contracts, data may also be collected from publicly accessible sources, such as databases, internet sources and media news, as well as by consulting public information provided by third parties.

### **1) Types of personal data, purposes and legal basis for the processing**

#### **A) Types of personal data**

The Company processes basic personal data and data on criminal convictions and offences, if provided under the procurement procedures, pursuant to art. 2-octies, paragraph 3 of Legislative Decree no. n. 196/2003 ("Privacy Code"), within the limits provided for under Articles 94 and following of Legislative Decree no. n. 36/2023 ("Code of Public Contracts"), referring mainly to the following categories of personal data:

- personal data pertaining to representatives of suppliers and sub-suppliers and to employees and collaborators of the same (including, by way of example, legal representatives, partners, agents, employees, delegates persons and affiliated subjects). This is basic data, including identification and contact data (such as, for example, name, surname, date of birth, tax code, address, telephone contacts, residence, domicile, certified e-mail (PEC), e-mail, bank details, details in ID), CVs, certifications and qualifications;
- data relating to criminal convictions and offences about persons identified by Legislative Decree no. 36 of 31 March 2023 (Italian Public Contracts Code) suitable to reveal rulings in the area of criminal records, as well as the existence of ongoing criminal proceedings resulting from certificates of pending charges;

- data certifying possession of the requirements provided for by anti-mafia legislation (Legislative Decree no. 159/2011) and, in particular, the absence of causes of suspension, disqualification or prohibition referred to in art. 67 of Legislative Decree no. 159/2011 and mafia infiltration attempts referred to in art. 84 of the same Decree.

## **B) Purpose of the processing**

Personal data will be processed solely for the purpose of:

- a) managing the registration, access and authorisation process for use of the Italgas Group Supplier Portal;
- b) attaining and/or maintaining qualification and inclusion in the Company Vendor List;
- c) verifying existence of the requirements provided for by law for participation in procurement procedures, in particular for the purposes of carrying out reputational checks on suppliers, anti-mafia checks pursuant to Legislative Decree no. 159/2011 and the general requirements pursuant to Legislative Decree no. 36 of 31 March 2023 (Procurement Code), including controlling the content of self-declarations;
- d) compliance with the "Ethics and Integrity Pact" (an act subject to compulsory adhesion, available on the Italgas Suppliers' Portal) and with specific provisions issued by public authorities legitimised to do so;
- e) identifying suppliers, requesting bids and evaluating them;
- f) entering into the contract;
- g) implementing the contract, managing the contractual relationship - including management of sub-suppliers, freight, etc. - and any amendments; verification of compliance with the obligations contractually undertaken and supplier assessment;
- h) management of pre-litigation, litigation and debt collection procedures.

## **C) Legal basis for the processing**

The processing of personal data is necessary in order:

- 1) to implement the contract or the pre-contractual conditions adopted at the request of the supplier for the purposes in letters a, d, e, f, g, pursuant to art. 6, paragraph 1, letter b), of the Regulation;
- 2) to fulfil the legal obligations which the Company is bound for the purposes in letters b, c, d, e, pursuant to art. 6, paragraph 1, letter c), of the Regulation;
- 3) to exercise the Data Controllers' legitimate interest for the purposes in letters b, c, g, h,; pursuant to art. 6, paragraph 1, letter f), of the Regulation. The legitimate interests pursued by the Data Controller are: to be able to have a Vendor List of qualified suppliers who meet the requirements of moral suitability, to carry out supplier assessments, as well as the exercise of the company's rights.

## **2) Processing procedure and nature of the provision of data**

The personal data will be processed by persons authorised by the Data Controller and/or by Data Processors which the Data Controller may use to store, manage and transmit the data, using paper-based, IT and telematic tools in accordance with the principles of law and protecting the privacy of the data subject and his/her rights through the implementation of appropriate technical and organisational measures to ensure an adequate level of security in relation to the risk.

The provision of data is voluntary but necessary in order to allow the Data Controller to establish and manage the legal relations indicated in the purposes, with the supplier. Failure to provide the data will prevent registration on the portal and/or participation in contract award procedures and/or establishment of the contractual relationship.

In order to fulfil the purposes indicated in paragraph 1 B), letter c) above, Italgas Group uses an automated process, which uses a specific algorithm that can carry out a massive search on open sources related to the personal data relating to criminal convictions and offences of the data subject, thus determining a profiling pursuant to Article 4 of EU Regulation No. 679/2016. It should be noted that the performance of the aforementioned activities does not subject the data subjects to any decision based solely on automated processing which produces legal effects concerning them or similarly significantly affects them.

For such processing, the data subject has, in any event, the right to exercise his or her rights pursuant to the Regulation, using the contact details set out in paragraph 6 of this privacy notice.

### **3) Data storage**

Your data will be kept for the period necessary to fulfil contractual and legal obligations in accordance with the principles of proportionality and necessity. The retention period depends on the purposes for which the data are processed and therefore may vary. The retention of personal data is determined with reference to (i) management of the relationship through the Suppliers Portal, (ii) management of the supplier qualification and identification process, (iii) management of the contractual relationship, (iv) to assert rights in court, as well as (v) for the time provided for by applicable law.

With regard to the Suppliers Portal, for registered suppliers only, the account will be disabled 24 months after registration in the event of non-interaction, upon receipt of a reminder notice. Personal data will be retained for a period of 10 years, within the terms for exercising contractual actions as referred to in the Italian Civil Code, and in any case for the time necessary for the exercise of the rights. This period starts from the end of the qualification validity period, or the conclusion of the contract for suppliers not subject to qualification. The personal data necessary to meet civil and tax obligations will also be stored thereafter, in compliance with the aforementioned obligations and in line with the storage periods laid down by the laws applicable at the time.

### **4) Disclosure, dissemination and transfer of data**

Your data may be communicated to:

- a) subjects contractually bound to the Company, such as banking and credit institutions, legal advisors, tax advisors and accountants, debt collection companies, financial risk detection and fraud prevention companies;
- b) third party companies (including insurance companies and intermediaries), as data processors in relation to services provided on behalf of the Company on the basis of specific contractual agreements;
- c) public entities and supervisory and control bodies, when this is necessary for the granting of subsidies, contributions, grants and facilities of any kind, related to the provision of products and/or provision of services, or when required by specific legislative, regulatory and authorisation provisions;
- d) subjects who: carry out tasks of a technical or organisational nature on behalf of the Company; carry out data acquisition, data entry, archiving and processing services necessary for use of the services offered to customers; provide IT services and services for management of the Company's technological infrastructure; carry out activities of forwarding, packaging, transport and sorting of communications to customers; provide customer assistance; check, audit and certification of the activities carried out by the Company, including in the interest of its customers, banks and credit card companies; other operators in the industry for management of the related relations; assistance and consultancy firms, including legal ones;
- e) external companies, including foreign companies, which operate in the sector of granting loans, including payment extensions, when permitted by current legislation, for the purposes of preventing and controlling the risk of insolvency and credit protection;
- f) companies of the Italgas Group, or parent companies, subsidiaries and associates of the Company, for administrative-accounting management and control purposes and for the supply of IT services and the management of the Company's technological infrastructure.

The parties belonging to the above categories will process the data as autonomous Data Controllers or as Data Processors, pursuant to Article 28 of the GDPR, or authorised persons for the processing, specifically identified by the Company, to whom the Company will issue adequate operating instructions, aimed at adopting adequate security measures, in order to guarantee the confidentiality, security and integrity of the data.

The data provided will not be disclosed to third parties and will not be disseminated. The data may be cross checked, for updating and analysis purposes, with other data in the legitimate possession of the Company.

The data will be processed in the European Union and stored on servers located within the European Union.

## **5) Rights of the data subjects**

Within the limits provided for pursuant to art. 2-undecies of the Privacy Code, the data subjects may exercise, in relation to the data processing described herein, the rights provided for by the Regulation (articles 15-21 and 77), including:

- to obtain confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, obtain a copy thereof, as well as further information on data processing (right of access);
- to rectify, modify and/or have incomplete personal data completed (right to rectification);
- to obtain the erasure or the restriction of processing of personal data processed in violation of the data protection law, including that which is no longer necessary in relation to the purposes for which the data was collected or otherwise processed (right to be forgotten and right to restriction);
- to object to the processing of personal data concerning them, where the conditions as per article 21 of the GDPR (right to object) subsist;
- to lodge a complaint with the Supervisory Authority if the data subject considers that the processing of personal data relating to them infringes the Regulation;
- to receive an electronic copy of the personal data concerning them in a structured, commonly used, machine-readable format and to have the personal data transmitted directly from one data controller to another, where the conditions as per article 20 of the GDPR subsist, and if technically feasible (right to data portability).

To exercise these rights, you can contact the Data Protection Officer (in abbreviated form, "DPO") by sending an e-mail to [dpo.gdpr@italgas.it](mailto:dpo.gdpr@italgas.it).

## **6) Identity and contact details of the Data Controller and contact details of the Data Protection Officer**

The Data Controller is the company, listed among those indicated in the introduction to this Information Notice, engaged in a relationship with the Economic Operator which you represent or for which you work.

The Italgas Group has appointed a Data Protection Officer who can be contacted at the e-mail address indicated in point 5, or via ordinary post at the company's registered offices.

*Privacy notice last updated: November 2025*

*It may be necessary in the future to make changes or additions to this privacy notice, as a result of regulatory or business changes. The updated privacy notice is available at any time on the Italgas Group Supplier Portal.*