

WEB PRIVACY POLICY

1. INTRODUCTION

The EU Regulation 2016/679 regarding the “protection of individuals with regard to the processing of personal data and the free movement of such data” (hereinafter the “**Regulation**” or “**GDPR**”) contains provisions aimed at granting the correct and lawful processing of personal data, in accordance with fundamental freedoms of physical persons.

This web privacy policy (the “**Web Privacy Policy**”), last updated on 24th May 2018, aims at explaining the management of personal data of the users of this website.

The website <https://www.efsolareitalia.com/> (hereinafter the “**Website**”) is owned and managed by EF Solare Italia S.p.A. (Tax Code/VAT number 13572371006) with registered office in Rome, Via Luisa di Savoia, 18, (00196 – Rome, Italy), (hereinafter “**EF Solare Italia**”).

EF Solare Italia is the data controller (hereinafter the “**Data Controller**”) of your personal data (the “**Personal Data**”) for the purposes specified in art. 3 of this Web Privacy Policy.

Personal Data protection is important for us. This Web Privacy Policy is designed to regulate the way in which EF Solare Italia intends to process the Personal Data of those submitting requests by using the “Contact us” section of the Website.

2. CATEGORIES OF PERSONAL DATA AND SOURCE OF THE DATA

Personal Data may be freely provided by you or, in the case of navigation data, gathered autonomously during the Website navigation.

When using the Website contact form, we collect name, surname, telephone number, email address relating to you as person interested in receiving any contact and/or information.

The Website uses cookies. For more information please read our [Cookies Policy](#).

This Website also incorporates PLUG-INS and/or buttons for social networks (Facebook, Twitter and LinkedIn) for sharing contents. Such PLUG-INS are programmed so that no cookies are set when accessing the web page, in order to preserve the privacy of users. Cookies may be used if required by the social networks to the extent they are effectively used on a voluntary basis. Please keep in mind that surfing the web while logged in the social networks means that you have already agreed to the use of cookies conveyed by this Website upon the subscription to the social networks. The collection and use of the information gathered through the PLUG-INS are regulated by the respective social network’s privacy notices, to which you should refer.

3. PURPOSES OF THE PROCESSING

The gathered data will be processed for the following purposes:

- a) to record the data submitted by interested subjects when filling the Website form and to reply to the information and/or contact requests, including those regarding the services provided by EF Solare Italia and to implement the same;
- b) to fulfil legal requirements, as well as obligations arising from provisions issued by competent authorities.

The provision of data for the above purposes is required.

In case you do not wish the Data Controller to process your Personal Data for these purposes, it will not be possible to receive our services through the Website and submit your contacts and/or information and allow EF Solare Italia to reply to such requests.

4. PROCESSING MODALITIES

The processing of Personal Data is carried out using manual, electronic and telematics tools for the purposes stated in this Web Privacy Policy and, in any case, in order to ensure the security and confidentiality of the data in accordance with current regulations.

In case of processing carried out with both electronic and non-electronic means, management and storage systems, including advanced hardware and software, the Data Controller may use third party service companies that will be made aware of their responsibilities with communication of appointment as Data Processor pursuant to Art. 28 of the GDPR.

The updated list of Data Processors is kept at the registered office of the Data Controller.

5. SUBJECTS TO WHICH THE DATA MAY BE COMMUNICATED

Within the scope of the purposes described above and for the performance of activities connected with and/or instrumental to the management of requests, your Personal Data may be communicated - in addition to persons whose right to access it is recognized by law - to external companies or entities.

The collected data may, therefore, be transferred or communicated to other companies that carry out activities for the Data Controller that are strictly connected and instrumental to the operation of the service, such as, for example, the company that deals with the management of users' personal data and the management of the IT systems on which they are stored and, in particular, to:

- Other companies of the EF Solare Italia group (the “Group”). Your Personal Data may be processed by other companies of the Group involved in the processing operations in relation to the performance of certain activities at

Group level. Such companies shall comply with the same obligations and the same management rules defined by the Data Controller and laid down in this Web Privacy Policy.

- Service Providers. Your Personal Data may also be processed by service providers, including authorized resellers, which EF Solare Italia uses to facilitate or outsource one or more aspects of the operation of the Website or activity. These service providers have specific confidentiality obligations towards EF Solare Italia and other legal restrictions that prohibit the use of EF Solare Italia's information they acquire (which may include your Personal Data) for purposes other than those necessary for the proper performance of the outsourcing activity, unless your consent has been granted for additional purposes.
- Authorities and Institutional bodies. In some cases, we may be required to provide your Personal Data in response to a court order, subpoena, government investigation and, more generally, in response to requests from competent authorities, as well as in all cases required by law. We may also communicate your data to the relevant authorities to report activities that, in good faith, we believe to be illegal or in any case committed in breach of applicable laws. Finally, we may make your Personal Data accessible to third parties when reasonably necessary to protect our or third-parties' rights, property, safety or to detect or prevent fraud, security or technical problems.

The Personal Data provided by users who submit requests are used only to perform the service or provision requested and are disclosed to third parties only if this is necessary for that purpose.

Apart from these cases, Personal Data will not be disclosed unless provided for by contract or law, or unless you give your specific consent.

Personal data may, thus, be transmitted to third parties, but only and exclusively in the event that:

- a) there is your explicit consent to share such data with third parties;
- b) there is a need to share information with third parties in order to provide the requested service;
- c) this is necessary to comply with requests from the judicial or public security authorities.

The subjects belonging to the categories to which the data may be communicated will process the data and use them, depending on the case, as Data Processors expressly appointed by the Data Controller pursuant to the law or, rather, as autonomous Data Controllers.

The Data Controller may appoint "authorized persons" for the processing all employees, also on *pro tempore* basis, and professionals, also on occasional basis, performing tasks that involve the processing of personal data.

6. PERSONAL DATA RETENTION

We will keep your Personal Data for the necessary period related to the purpose they have been collected, following which they will be destroyed or rendered permanently unusable. In particular, once EF Solare Italia has replied to all the relevant requests and if there are no more contacts between EF Solare Italia and the user, the data will be deleted one year after they have been submitted.

It is understood that the above is without prejudice to the cases of compliance with legal obligations or any authorities' order. The verification of the obsolescence of the stored data in relation to the purposes for which it was collected is carried out periodically. At the end of the retention period, your Personal Data will be deleted, destroyed or made anonymous, without prejudice to any storage terms provided for by law.

Upon elapse of this term, the right of access, cancellation, rectification and the right to portability of the Personal Data may no longer be exercised.

In addition, we will retain your Personal Data if necessary to comply with our legal obligations (such as keeping track of your transactions for administrative purposes), settle disputes and enforce our rights (for defensive purposes). We will delete your Personal Data upon your request, where applicable, in accordance with applicable data protection laws.

7. PLACE OF PROCESSING

Personal Data will be processed by the Data Controller at its registered office and operational headquarters.

8. PERSONAL DATA TRANSFERS

In some cases, the Personal Data you provided to us may be transferred to countries outside the European Union ("EU"), in the case such data are stored on servers which are outside the EU (for example in the case of cloud storage). In this case, the Data Controller hereby guarantees that the transfer of the Personal Data outside the EU will be regulated in accordance with the provisions of Chapter V of the Regulation and authorized on the basis of specific decisions of the European Union. In such case, we will adopt all necessary safeguard measures in order to ensure the full protection of Personal Data according to the following principles and measures: a) adequacy decisions of the third-country recipient issued by the European Commission; b) adequate guarantees expressed by the third-party recipient pursuant to art. 46 of the Regulation; c) adoption of binding corporate rules.

9. YOUR RIGHTS AS DATA SUBJECT

As Data Subject, you may notify in writing the Data Controlled by registered letter with return receipt or by email to segreteria@efsolareitalia.com, in order to exercise at

any time the rights that are recognized by the law on the protection of personal data and, in particular, you may obtain:

- access to the Personal Data;
- Personal Data portability;
- opposition to the processing activities;
- rectification of data, limitation of data processing, erasure (right to be forgotten) of data;

In addition, you may revoke your consent and raise a complaint with the supervisory authority (Privacy Authority).

10. PRIVACY POLICY OF THIRD PARTIES

This Web Privacy Policy is provided solely for the Website and its possible sub-domains and shall not apply to other sites or web pages that you may browse through links or cross-references on this Website. Therefore, we encourage you to inform yourself about the privacy policies of third parties before providing them with any personal information and/or filling any electronic forms.

11. LIMITATIONS FOR DATA OF MINORS

If you are under the age of 16, you cannot register with this Website or provide us with your Personal Data without the prior consent of your parents or other authorized parties.

If EF Solare Italia becomes aware that it has collected Personal Data from a minor without the prior consent of the holder of parental responsibility, it will promptly delete such information. The Data Controller invites all those who exercise parental responsibility over minors to inform them about the safe and responsible use of the Internet and the Web.

If you believe that EF Solare Italia has collected Personal Data from a minor, please contact us at the following address: segreteria@efsolareitalia.com.

12. PERSONAL DATA SECURITY

We will adopt the most appropriate security measures to protect your Personal Data from unauthorized access and processing.

13. MODIFICATION TO THE WEB PRIVACY POLICY

This Web Privacy Policy may be amended or supplemented at any time at EF Solare Italia's sole discretion. We will post any changes to this Web Privacy Policy on the Website and, if the changes are material, we will inform you. The date on which the

latest version of this Web Privacy Policy was amended is reported at the top of the page.

14. HOW EXERCISE YOUR RIGHTS

If you have any questions regarding this Web Privacy Policy, or if you wish to exercise your rights under Article 4 above, please contact the following address: segreteria@efsolareitalia.com.