

Pursuant to Italian and European legislation on data protection (EU Regulation 2016/679), the processing of information concerning users of the services offered by Acquedotto Pugliese S.p.A. will be based on the principles of correctness, lawfulness and transparency, protecting their confidentiality and rights.

1. DATA CONTROLLER AND PERSONAL DATA PROTECTION OFFICER

The Data Controller for the services offered is Acquedotto Pugliese S.p.A. (hereinafter also referred to as "AQP" or "Data Controller"), with registered office in viale Cognetti 36. - 70121 Bari. The Data Controller safeguards the confidentiality of personal data and guarantees the necessary protection from any event that may put them at risk of violation. To this end, the Data Controller implements policies and practices concerning the collection and use of personal data and the exercise of the rights granted to you by the applicable regulations. The Controller takes care to update the policies and practices adopted for the protection of personal data whenever necessary and in any case in the event of regulatory and organisational changes that may affect the processing of your personal data.

The Data Protection Officer (DPO) is a person belonging to the Acquedotto Pugliese S.p.A. Group.

Any contact with the Data Protection Officer (DPO) may take place:

- by filling in the appropriate form at the following link:
<https://www.aqp.it/privacycookie/tutela-dati>;
- by sending an e-mail to the following e-mail address: dpo@aqp.it.

2. PURPOSE OF THE PROCESSING AND THE DATA SUBJECT TO THE PROCESSING

The Data Controller collects and/or receives information regarding the user, including but not limited to: name, surname, tax code or VAT number, place and date of birth, physical and telematic address, landline and/or mobile telephone number, current account number, ISEE (Equivalent Financial Situation Indicator), real estate data (land registry) and purchase and rental contracts for the property to be supplied, data relating to commercial and/or professional activities, inheritance certificates, etc.

They are used for the purposes of managing the supply contract and fulfilling the legal and regulatory obligations to which the Data Controller is bound by virtue of the activity carried out, as well as for providing the newsletter and MyAQPaggiorna services, only upon the User's request and consent.

Acquedotto Pugliese S.p.A. will process personal data and information collected for specific purposes such as:

A) Registration to the institutional site (Execution of the contract): access, after registration, to the on-line services ("AQP Facile - Sportello On Line") through the creation of a user account (e-mail address, personal data and password through the on-line registration forms) useful to take advantage of the services offered by the Data Controller through the site and access the on-line portal;

B) Registration to the Newsletter and MyAQPaggiorna (Consent): subscription to the services that allow you to stay up to date on job opportunities and initiatives promoted by AQP by e-mail, to those who explicitly request it;

C) Publication on "La Voce Dell'Acqua" (Execution of pre-contractual measures taken at the request of the interested party): sending of content (articles, contributions, etc.) by Users for publication on "La Voce dell'Acqua", AQP's online information periodical;

D) Management of the contractual relationship (Contractual Execution)

- Conclusion of the contract for the provision of services and fulfilment of pre-contractual, contractual, administrative-accounting and tax obligations, deriving from the existing relationship, including the provision of on-line services on the Site (e.g. for the management of contract requests and turn-over) and the sending of communications aimed at the correct performance of the contractual relationship (e.g. tariff updates, deadlines, facilitations and services for utilities)
- customer assistance, management of complaints, reports and/or requests for information relating to services, also through dedicated numbers (toll-free number), "call me back" services (call me back), management of appointments at Front Offices (also through Apps and dedicated services) and video appointments (so-called Digital Counter);
- management of litigation (breach of contract, warnings, settlements, debt collection, arbitration, litigation, etc.);
- management of claims for damages;

E) Consequent fulfilments in dependence of the contract also regulatory (Legal Obligation): The obligations that the Controller must fulfil in dependence of the contract and of specific regulations governing it are, among others, those of:

- keeping of accounts;
- communications to Bodies and Companies such as, for example: Municipalities, Revenue Agency, Credit Recovery Companies, Insurances, ARERA, Regions, Sector Authorities, Local Health Authorities, etc.;

F) Customer satisfaction activities (Legitimate Interest and Legal Obligation): the processing of personal data is carried out in order to assess the degree of satisfaction with the services that the Controller performs, to comply with sector regulatory provisions (e.g. ARERA Regulation), which expressly require the Controller to assess the degree of User satisfaction and to transmit the results in aggregate form to the relevant Authorities, and in its legitimate interest in improving the services offered to customers. The processing of data (such as name, surname, physical and telematic address, fixed and/or mobile telephone number) may take place for:

- e-mail;
- sms;
- telephone contact, also without operator;
- paper mail;
- newsletter, for companies that have requested this service;

- social networks;

G) "Water Academy" training activities (Execution of pre-contractual measures taken at the request of the data subject): access, to those who explicitly request it, to the use of the services offered by the Data Controller on the aqpwateracademy.it and aqpwateracademyyoung.it websites (registration, selection and provision of training courses), by filling in a specific form (e-mail address, personal data);

IT security purposes (Legal Obligation):

Such processing may take place to the extent strictly necessary and proportionate to guarantee the security and capacity of a network or of the servers connected to it to resist, at a given level of security, unforeseen events or unlawful or malicious acts that compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted. To this end, AQP provides procedures for the management of personal data breaches (Data Breach) in compliance with legal obligations.

I) Recording of Fault Signalling Calls (Legal Obligation): Obligation sanctioned by ARERA (Resolution 655/2015) to which the Holder is obliged to comply;

J) Recording of contractual telephone calls (Consent): Completion of contractual requests through the telephone channel at the request of users and subject to their consent (including through 'call me back' activities);

K) Registration to "FontaninApp" (Execution of pre-contractual measures taken at the request of the data subject): access, after registration, to the on-line services ("FontaninApp") through the creation of a user account (e-mail address, personal data and password by means of the relevant on-line registration forms) in order to share images and contents;

L) Managing the receipt of CVs and applications sent by the user from the "Work with us" section (Execution of pre-contractual measures taken at the request of the data subject).

3. NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF ANY REFUSAL TO PROVIDE DATA

The provision of personal data requested by AQP is necessary for the pursuit of the purposes indicated above. Any refusal to provide the data necessary for these purposes could make it impossible to fulfil the user's requests or to provide the other services available or, again, to correctly fulfil contractual (or pre-contractual), legal and/or regulatory obligations.

The legal basis for the processing of the data necessary for the pursuit of the aforementioned purposes is constituted by legal and regulatory obligations, contractual performance and the necessary pre-contractual measures.

In the activities the legal basis is the "legitimate interest" (Art. 6, paragraph 1, letter f), GDPR, recital C47, GDPR) of AQP, the data will be used to assess the characteristics of users who are interested in its institutional activities and to analyse, also anonymously, their opinion in order to improve, integrate or modify the quality and range of the services made available, as well as to adapt its own initiatives towards Users.

In relation to the services for which consent constitutes the legal basis, the data subject may always revoke his/her consent by clicking on the appropriate unsubscribe link that he/she will find inside (footer) each communication received or in a specific section of our site. The communication to AQP of further data, other than those the provision of which is compulsory for

the fulfilment of its legal or contractual obligations, is optional and does not have any consequences on the use of the services. Depending on the case and, if necessary, from time to time, the Users of the services will be informed about the compulsory or optional nature of the provision of personal data. The compulsory or optional nature of the provision of data will be highlighted by means of a notice or special character. Finally, it is reiterated that failure to provide optional personal data will not entail any obligation or disadvantage.

4. PROCESSING OF PERSONAL DATA

The personal data provided will be:

- processed by the employees of AQP, specifically authorised for the management of the paperwork necessary to carry out the requested service;
- processed and possibly communicated to public administrations (e.g. municipal and regional), Financial Administration, Tax Police, Guardia di Finanza, Hygiene Office, Supervisory and Control Authorities and, in general, to all bodies in charge of checks and controls on the regularity of the fulfilments referred to for the purposes indicated;
- third party companies or other subjects carrying out activities in the name and on behalf of AQP appropriately identified as Data Processors pursuant to art. 28 GDPR.

In any case, no personal data will be disclosed.

5. TRANSFER OF DATA

Your personal data will not be transferred abroad to countries other than those belonging to the European Union, unless they ensure adequate levels of protection of individuals in accordance with the provisions of Article 45 paragraph 1 of the GDPR.

6. DATA PROCESSING METHODS

The User's personal data will be processed by automated and non-automated means, ensuring the use of appropriate security and organisational measures, as well as guaranteeing the confidentiality of the data.

Phone calls to the Commercial Freephone Number (800.085. 853) will be recorded, at the request of Users, for the stipulation of telephone contracts and for better management of reports and/or complaints (for the protection of telephone operators and for the defence of AQP SpA in court).

Telephone calls to the Fault-Free Number (800.735.735) will always be automatically recorded in order to comply with ARERA provisions (Resolution 655/2015).

7. DATA STORAGE PERIOD

The data collected shall be stored for the entire duration of the services requested and, even after their termination, for the fulfilment of any legal obligations connected with or

deriving from them, unless the User has given explicit consent in relation to some of the services offered; in the latter case, the processing may last until the consent is revoked. Some data may be stored in aggregate and anonymous form for statistical purposes only or for the analysis and improvement of the services offered.

Therefore, the criteria used to determine the retention period are established by:

- specific legal provisions, which regulate the activity of AQP;
- the tax legislation regarding the processing of administrative and accounting data (10 years); in particular, for financial data (e.g. payments, refunds, etc.) the retention period required by the applicable tax and accounting laws is applied;
- in the event that the User has given explicit consent, the processing may last until the revocation of the same

Finally, personal data may also be kept for as long as permitted by Italian law to protect the legitimate interests of AQP (art. 2947, par. 1 and 3 of the Italian Civil Code).

8. RIGHTS OF SERVICE USERS: HOW TO ACCESS, CORRECT AND DELETE PERSONAL INFORMATION

Users are acknowledged all the rights provided for by the European legislation on the processing of personal data, namely:

a) to obtain confirmation of the existence or otherwise of personal data processing concerning them and, if so, to obtain access to such data and to all information relating to such processing;

b) to obtain the rectification of inaccurate personal data without undue delay and to complete incomplete data, including by providing a supplementary declaration;

c) to obtain the deletion of their personal data if - the data are no longer necessary in relation to the purposes for which they were collected or processed,

- the data have been processed unlawfully,
- the data must be deleted in order to comply with a legal obligation,
- the data subject has withdrawn consent,
- the data subject objects to the processing;

d) to obtain the restriction of the processing when one of the following cases occurs

- if the accuracy of the personal data is contested, for the period necessary for AQP to verify said accuracy;
- if the processing is unlawful, one opposes the deletion of the personal data and instead requests that their use be restricted;
- if the personal data are necessary for the establishment or exercise of a right in a court of law of the data subject, although AQP no longer needs them for the purposes of the processing;
- whether the data subject has objected to the processing, pending verification as to whether AQP's legitimate reasons prevail over his own;

e) to receive, in a structured, commonly used and machine-readable format, the personal data concerning him/her and to transmit such data to another data controller without hindrance from AQP;

- f) to object, in whole or in part, to the processing; where personal data are processed for scientific or historical research purposes or for statistical purposes, for reasons related to his/her particular situation, he/she shall also have the right to object to the processing, except where it is necessary for the performance of a task carried out in the public interest ;
- g) to revoke, at any time, the consent given (in such cases, revocation of consent does not affect the lawfulness of the processing based on the consent before revocation);
- h) to lodge a complaint with the Garante per la Protezione dei Dati Personali (for more details on how to do this, see www.garanteprivacy.it).

The aforementioned rights may be exercised by making a request to the Data Protection Officer (DPO): by filling in the appropriate form at the following link: <https://www.aqp.it/privacy-cookie/tutela-dati> or by sending an email to the following email address: dpo@aqp.it.

9. MODIFICATIONS AND UPDATES TO THIS INFORMATION NOTE

AQP SpA will take care of modifying or simply updating, in whole or in part, this information on the processing of data also in consideration of the modification of the laws or regulations that govern this matter and protect the rights of the users of the services.

Changes and updates will be made available to service users in the "Privacy and cookie policy" section as soon as they are adopted.

Last update August 2023.