

PROCESSING OF PERSONAL DATA RELATING TO ETHICAL/REPUTATIONAL CONTROLS AND THOSE REQUIRED BY APPLICABLE REGULATIONS

This privacy notice is provided by Eni, to be understood, as the case may be, as the parent company Eni S.p.A. or another company in the group acting as data controller (hereinafter the “**Company**” or the “**Data Controller**”)¹. In particular, the Eni company with which the recipient of this privacy notice intends to establish a relationship (e.g. of a contractual nature) is to be considered the Data Controller.

Pursuant to the Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, “**GDPR**”), the Company hereby provides the information concerning the processing of personal data (hereinafter, “**Personal Data**” or “**Data**”) in the context of (i) the anti-corruption due diligence process and related fulfilments (hereinafter, “**Due Diligence**”)²; (ii) ethical and reputational controls and those required by applicable economic and financial sanctions regulations (hereinafter, “**Controls**”).

Due Diligence constitutes one of the key elements of Eni’s Anti-Corruption Compliance Program and is aimed at verifying that any third party intending to enter into a contractual relationship with Eni or other companies within Eni’s control perimeter complies with the anti-corruption principles established by Eni in the framework of the Anti-Corruption MSG and the existence of potential risk factors that must be taken into consideration (the “**Red Flag**”).

The Controls are aimed at ensuring that any third party interacting with the Company (“**Counterparty**”) complies with the principles set out in Eni’s Code of Ethics, as well as with the regulations applicable from time to time, which prohibit or limit the possibility of carrying out certain transactions with persons included in public lists maintained by state and/or supranational authorities.

This privacy notice is addressed directly to the Counterparty subject to Due Diligence and Controls (if a natural person), as well as to the individuals included in the organisation and/or structure of the Counterparty - including any natural person shareholders - subject to Due Diligence and Controls (e.g. legal representatives) as well as to third parties assisting the latter in the negotiation/conclusion of contracts (hereinafter, jointly, “**Data Subjects**”). The Counterparty undertakes to transfer such information to the persons whose Personal Data will be processed.

1. Data Protection Officer

For any information concerning the processing of Personal Data, you may contact the Data Protection Officer (“**DPO**”) appointed by the Company, by sending an e-mail to the following address: dpo@eni.com.

2. Personal data processed

The Personal Data processed include (i) Personal Data requested from the Counterparty and the Data Subjects in the context of Due Diligence and Controls (e.g. personal details); (ii) Personal Data acquired autonomously by the Data Controller through the consultation of information in public databases that can also be accessed through third parties, internet sources, media news and other databases of corporate information.

3. Purpose of processing

The purpose of the processing of Personal Data is to:

¹ The identification data of the actual data controller are detailed in the list of Eni’s subsidiaries available on the website www.eni.com, in the section “Documentation” – “Financial Statements and Reports” – “Financial Report”.

² See Eni’s Regulatory Instrument on Anti-Corruption published on the website www.eni.com.

- a. with reference to Due Diligence, to avoid the Data Controller's involvement in frauds and, specifically, in bribery offences that could expose him/her to serious reputational risks, as well as to sanctions deriving from non-compliance with the anti-corruption regulations to which the Data Controller is subject (e.g. Foreign Corrupt Practices Act, UK Bribery Act, Legislative Decree 231/01);
- b. with reference to the Controls, (i) to prevent the Data Controller from establishing relations with Counterparties involved in fraud, (ii) to verify whether the Counterparties are subject to economic and financial sanctions and (iii) to ensure compliance with the regulations applicable from time to time (e.g. Regulations adopted by the Council of the European Union on restrictive measures) in order to avoid material damage (e.g. sanctions, depletion of its assets) or immaterial damage (e.g. damage to its public image)
- c. to ascertain, exercise or defend a right of the Data Controller or a third party in court.

4. Legal basis

The processing of Personal Data for the purposes set out in paragraph 3, pursuant to Article 6(1)(f) GDPR, is based on the legitimate interest of the Data Controller in protecting its rights.

Any refusal to provide Personal Data for the pursuit of the purposes set out in paragraph 3 will result in the impossibility of carrying out Due Diligence and functional Controls for the potential establishment of business relations with Eni or other companies within Eni's perimeter of control.

5. Means of the processing

Personal Data may be processed with the aid of electronic or automated systems, managed through tools that ensure security and confidentiality, and will include every operation or set of operations necessary for the processing.

6. Persons authorised to process and recipients of personal data

For the pursuit of the purposes indicated in paragraph 3, Personal Data will be processed by personnel appointed by the Data Controller and may be communicated to:

- police forces, armed forces, control authorities, judicial authorities and other public administrations, for the fulfilment of obligations provided for by law, regulations or EU or supranational legislation. In such cases, under the applicable data protection regulations, there is no obligation to obtain the prior consent of the Data Subject for such communications;
- companies specialising in forensic activities on behalf of Eni S.p.A. and the companies directly or indirectly controlled or participated by Eni S.p.A.;
- other companies contractually bound to the Data Controller that carry out, by way of example, auditing activities for the purposes of ISO 37001 certification, auditing activities, etc.;
- Eni companies for the execution of processing for purposes related to those set out in point 3.

Data will not be disseminated.

With respect to Personal Data disclosed to them, the recipients in the above categories may operate, as the case may be, as data processors (in which case they will receive appropriate instructions from the Data Controller) or as independent data controllers.

The Company guarantees the utmost care so that the communication of Personal Data to the aforesaid recipients only concerns the Data necessary to achieve the specific purposes for which they are intended.

7. Transfer of Personal Data outside the European Economic Area

Where this serves the purposes set out in paragraph 3, the Data may also be transferred abroad to companies based outside the European Economic Area ("EEA"). Some of the jurisdictions outside the

EEA may not provide the same level of Data protection as in the EEA. In this case, the Data Controller undertakes to regulate the transfer and subsequent processing of the Personal Data through the *Standard Contractual Clauses* provided by the European Commission and to adopt every other safeguard required by article 46 GDPR if it is not possible to use one of the derogations listed in article 49 GDPR.

8. Storage of personal data

Data will be stored in the Data Controller's computer archives and protected by appropriate security measures for the time necessary to achieve the purposes set out in paragraph 3 above, and will subsequently be deleted. Personal Data may be retained for a later period in case of possible litigation, requests by the competent authorities or pursuant to applicable legislation.

9. Rights of data subjects

Where applicable and within the limits set by the GDPR, Data Subjects have the right to:

- obtain confirmation from the Data Controller as to whether or not Personal Data is being processed and, if so, to obtain access to the information referred to in Article 15 of the GDPR;
- obtain the rectification of inaccurate Data concerning them, or, taking into account the purposes of the processing, the integration of incomplete Personal Data pursuant to Article 16 GDPR;
- obtain the deletion of Personal Data, in the presence of one of the reasons referred to in Article 17 GDPR;
- obtain the limitation of the processing of Personal Data in the cases provided for under Article 18 GDPR;
- receive – in a structured, commonly used and machine-readable format – the Personal Data provided to the Data Controller, so that the latter may transmit it to another controller without hindrance pursuant to Article 20 GDPR;
- object to the processing of their Personal Data for particular reasons unless there are compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims pursuant to Article 21 GDPR.

These rights may be exercised by emailing the DPO at dpo@eni.com.

Without prejudice to any other administrative or jurisdictional processings, Data Subjects also have the right to lodge a complaint with the competent supervisory authority (for Italy: *Garante per la Protezione dei Dati Personali*) if they believe that there has been a violation of their rights regarding the protection of Personal Data.