

OUR COMMITMENT TO PERSONAL DATA PROTECTION

We care about your data

We know you care about your personal data and how it is used, and we want you to trust that the Hera Group uses it with due care and attention. That's why we want to help you understand what personal data we collect, why we collect it and what we do with it.

We are eager to continue improving our communication, so please do not hesitate to let us know if you have any questions or requests for explanations, by writing to the DPO at dataprotectionofficer@gruppohera.it or by using the Hera Group companies' contact pages. Through the latter, you can find out what rights you have and how you can exercise them, by reading the privacy notices for the various company services. You can also object to certain uses of your personal data, including the use of your personal data for marketing purposes.

Who is collecting your data?

Hera Group Companies, each acting as Processor depending on the different services or products provided.

What is personal data? What personal data are collected (opt-in/opt-out consent)?

Personal data is any information that can be used to directly or indirectly identify a specific individual. This definition includes personal data collected through our help desks, call centres and direct marketing campaigns, and online through our websites, apps and branded pages on third party platforms and apps accessed or used through third party platforms.

Therefore, we may collect personal data from a variety of sources:

- Personal data that you provide to us directly
- Personal data that we collect automatically
- Personal data we collect from other sources (ex. from databases for credit risk assessment purposes).

You are not required to provide the Hera Group with the personal data we request, but if you choose not to do so, we may not be able to provide you with our products or services, answer all of your questions or respond to your requests with high quality service.

We do not generally collect data such as race, ethnicity, religion, health, sexual orientation or biometric data. These are classified as "special categories of data" and benefit from additional protection under data protection legislation.

Only when necessary and in order to provide you with a service that complies with current legislation, the Hera Group processes data relating to your health (ex. for the provision of social bonuses, or continuity in non-interruptible services). The Hera Group processes your health-related data only if you have given us your consent or if there is a legal obligation to do so.

Subject to specific disclosure and release, the Group may also process your images in case you participate in specific initiatives, such as competitions.

Furthermore, the Hera Group does not process your personal data using automated decisions. No decision is made solely by automated means, and a human being always intervenes in the decision-making process related to your personal data.

How we collect your personal data

We may collect your personal data from a variety of sources. More specifically, this includes:

- Personal data that you provide directly to us: we collect it when you decide to subscribe to a newsletter, answer a survey or register by text/email to receive alerts or info. In so doing, we may request personal data from you, such as your name, gender, date of birth, address, e-mail address and phone number. It is always possible for you to unsubscribe from one of our services by using the unsubscribe links on the subscription page.
- Personal data we collect automatically: the Hera Group uses technical cookies in order for its site to function properly and, only if you want, third-party analytical and profiling cookies.

More specifically:

Technical cookies are generally necessary for the website to function properly and to allow navigation; without them you may not be able to correctly view the pages or use certain services. Technical cookies can be further divided into navigation cookies, which ensure the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); analytics cookies, which are included under technical cookies only when they are used directly by the website manager to collect information, collectively, concerning the number of users and how they visit the site; functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, language, or products selected for purchase) in order to improve the service provided to the user. **Your consent is not required to install technical cookies.**

Profiling cookies, on the other hand, are designed to create a profile and are used to promote offers that reflect the preferences you have expressed while navigating the web. Since these tools are not necessary for the proper functioning of the site but are used only to allow you to learn about offers that best suit your needs, **they require your consent, which can be freely revoked at any time, without prejudice to the processing prior to revocation.**

To make informed choice, you can view the full “Cookie Policy” in the footer of the Hera Group website. You can give or revoke your consent by setting your preferences within the cookie policy. It is also possible to remove previously saved cookies by means of special browser or device functions.

The use of **third-party cookies** cannot be fully controlled by Hera. Therefore, to obtain information and grant consent, you can consult the privacy policy of the respective third parties.

For what purposes do we use your data?

We process your personal data only for specific and limited reasons. For example, to finalise supply or sales contracts; assess and deal with any complaints; develop and improve our products, services, methods of communication and the functionality of our websites; provide you with personalised products and services, targeted communications and advertising, and energy and water saving advice; process and respond to your requests, or contact you to answer your questions and/or requests; communicate information to you and to manage your registration and/or subscription to our newsletter or other communications; authenticate the identity of people who contact us by telephone, electronic means or otherwise; and, subject to your consent (opt-in), to understand and evaluate your interests, wishes and changing needs. We also monitor customer satisfaction and improve our products and services, also developing new ones.

We also need to process your data to detect and protect against fraud and technical or security vulnerability; respond to an emergency; or comply with a legal obligation (such as tax or social security obligations) or ensure what is requested by authorities.

Who will it be shared with?

Each Hera Group Company shares your personal data within the Group and with selected third parties in the following circumstances:

- Service providers, in order to meet your requests, process your orders, or provide you with various other functions and services. We share your data with suppliers who carry out activities on our behalf, such as companies who: host or operate the Group's websites and call centres, process payments, provide customer support and postal or delivery services. These companies have access to the personal data they need to carry out their functions and may not use it for any other purpose. In addition, they must process this personal data in accordance with their contractual obligations and as permitted by all applicable data protection laws and regulations.
- Internal Group communications. Your personal data will be used within the Hera Group, mainly for business and operational purposes, in compliance with the specific unbundling legislation.

Policy on disclosure of the data collected to third parties

In the event that the Group Companies/Owners use third parties to manage personal data on their behalf, this relationship is governed by the legal act of appointing a data controller, pursuant to Art. 28 of the GDPR.

The privacy communications you are entitled to

When we collect and use your personal data for the purposes mentioned above or any other purposes, we will inform you before or at the time of collection; in this regard, you can read all the specific information available on the Group's corporate website <https://eng.gruppohera.it>.

Where appropriate, we will ask for your consent before processing your personal data. Where you have given consent for processing, you have the right to revoke this consent at any time by writing to the dedicated email communicated with your privacy notice.

In some cases, we refer to legitimate interest in processing your personal data. A legitimate interest may be present, for example, when we carry out telephone surveys to measure customer satisfaction and improve the services we offer, as well as provide reports analysing consumption and suggest efficient behaviour for a more aware use of environmental resources, without this ever overriding your rights as an individual. This legal basis will only be relied on where there is no less intrusive way to process personal data. We can assure you that processing based on legitimate interest is kept under control, through a balance between business benefits and the protection of your privacy.

What are your rights?

The GDPR has provided for guaranteeing the following rights regarding your personal data:

- Art. 15 Right of access
- Art. 16 Right of rectification
- Art. 17 Right to erasure (right to be forgotten) opt-out
- Art. 18 Right to restriction of processing
- Art. 20 Right to data portability
- Art. 21 Right to object

Further information and advice on your rights can be obtained from the Data Protection Authority.

How do we protect your personal data?

The Hera Group takes the security of your personal data very seriously. We make every effort to protect your personal data from misuse, integrity interference, loss, unauthorized access, modification or disclosure. Our measures include implementing appropriate access controls, investing in the most recent IT security technology to protect the IT environments we use and ensuring that we encrypt personal data, making it pseudonymous and anonymous when necessary. Within the Group Companies, we ensure that processing is carried out by authorised and designated staff. Access to your personal data is also granted to our authorised suppliers, who are also subject to strict contractual obligations regarding confidentiality.

In this regard, we conduct regular compliance audits concerning the applicable privacy laws.

How do we protect the privacy of minors?

We understand the importance of taking extra precautions to protect the privacy and safety of minors, involved in internships or young people attending Transversal Skills and Orientation courses at the Hera Group. If one of our websites is intended to be used by a younger public, we ask for the consent of the person(s) having parental responsibility before collecting the minor's personal data.

If we discover that we have collected personal data from a minor without the required consent of a parent or guardian, we will delete this data as soon as possible.

If you are a minor, you should read the terms of this Privacy Policy with your parent or guardian to ensure that you understand and accept them.

Personnel responsibility and training

In order to ensure that processes and activities are carried out correctly, the Hera S.p.A. Supervisor for Privacy, Information Security Compliance and QSA Regulations supports the Personnel Department (or the equivalent department in subsidiary companies) in defining the most suitable training courses paths for personnel involved in privacy and data processing activities.

Privacy audits

Hera and the companies within the Group carry out periodic audits, also involving external parties who manage personal data on its behalf, in order to check that their work complies with the organisational, technical and security measures regarding the processing of personal data provided for by current regulations.

Disciplinary actions

Violations of internal procedures concerning personal data processing are punishable on the basis of the provisions of the Hera Group's Code of Discipline. Employees are liable, where the conditions subsist, in civil and criminal proceedings for any violations. Violation of the procedures constitutes a breach of contractual obligations by collaborators, consultants and personnel employed by external companies, authorised or enabled to use the Hera Group's IT resources, even if only occasionally or temporarily, and consequently, in the event of an ascertained and particularly serious violation, the Hera Group reserves the right to terminate the contract, without prejudice to any possible action, where the legal requirements are met.

International data transfers

The Hera Group processes personal data within the European Union (EU); in the event your personal data is transferred outside the EU, the Hera Group will carry out an assessment of the risks and impacts of the transfer with regard not only to the risks arising from the legislation in force in the country where the data is imported, but also to the measures that the individual Importer is actually able to guarantee to mitigate such risks.

How long do we keep your data?

We will keep your personal data for as long as is necessary for the purpose for which it is processed. For example, if you request a service from us, we will retain your information for the time required for us to carry out the contract you have entered into, and also afterwards, only for as long as is necessary to deal with or respond to any complaints.

However, we will keep the identifiable data we collect for as short a time as possible, after which we will take steps to delete it.

We will actively review the personal data we hold and, when there is no longer any legal, business or stakeholder need, we will securely delete it, or in some cases make it anonymous.

How to contact the Hera Group

The Group has appointed a **Data Protection Officer**, who is the Supervisor of Privacy, Information Security Compliance and QSA Regulations of Hera S.p.A. All interested parties (customers, web users, employees, visitors and suppliers) can contact this person at Hera S.p.A., viale Berti Pichat 2/4 40127 Bologna, or by email at dataprotectionofficer@gruppohera.it, for any questions or doubts about the Privacy Policy or data processing, or to lodge a complaint about a possible violation of privacy regulations. Additional channels are also available for employees to report problems and/or concerns. You may also submit a request via the "Contact Us" form found on our websites. When a privacy question or access request is received, we have a dedicated team that tracks the contact and tries to resolve the specific issue or question.

When we publish changes to this statement, we will revise the "last updated" date at the bottom of this Communication, without prejudice to updates in the specific communications related to our services.

We will keep previous versions of this document on file.