



## EMPLOYEE PRIVACY POLICY

The following Privacy Policy – according to article 13 of General European Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as “GDPR”) aims to describe how the personal data of employee are processed and to inform the data subject.

EPS Elvi Energy S.r.l. (hereinafter referred as “EPS”) subject to the direction and coordination of ENGIE EPS S.A., registered office at Milan, Via Privata Anton Francesco Grazzini, 14 – 20158 is **Data Controller** of the employee personal data and if you would obtain more information about the data processing, you could contact the Ethics & Compliance Officer, writing to the following email address [privacy@engie-eps.com](mailto:privacy@engie-eps.com).

### **PERSONAL DATA PROCESSED**

EPS process the personal data to identify you, such as name, surname, e-mail, address and telephone number. Moreover, must be process bank details, sickness benefit, assurance and study and professional path and the sensitive data required in the “Substitutive declaration”. If you do not want to provide these personal data, will make it impossible to perform the contract.

If you have voluntarily included in your CV, or subsequently communicated personal data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, unions, associations or organizations of a religious, philosophical, political or trade union, as well as personal data disclosing health or sex life (c.d. particular categories of personal data), these will be deleted, unless their use is strictly necessary for the performance of employment relationship (e.g. in case of sheltered group) within the limits and in accordance with the provisions of the Data protection Law.

EPS process the technical personal data resulting the use of working informatic tools or emails, etc.

### **POURPOSES OF THE DATA PROCESSING**

EPS process your personal data in order to:

- be compliant with legal obligation, including Ethics Policies and procedures, regarding to conflict of interest, anti-corruption and requirements prescribed by Italian Legislative Degree 231/01;
- perform the employment contract and follow up at contract obligations relating to the relationship with EPS. Your personal data are processed also for administrating, accounting, contracting, billing, paying management and sending information or communications;
- Litigation management and control quality management of enterprise process.

### **LEGAL BASIS OF DATA PROCESS**

The processing of personal data is necessary to perform the employment contract and accounting and administrating obligations. Moreover, the processing of your personal data carries out for the legitimate interests pursued by the data Controller, protecting your rights and enterprise business quality.

### **HOW TO PROCESS THE PERSONAL DATA**

The data processing carries out with information system and organizational and logical methods strictly related to indicated purposes and are implemented all technical and procedure security measures to ensure the confidentiality, integrity, availability and resilience of data processing, in comply with the article 32 of GDPR.



## **COMMUNICATION OF PERSONAL DATA**

Data Controller could authorize internal or external parties to perform the data processing. The internal parties are “people in charge of data processing” involved in the business organization like as Human Resources, Ethics & Compliance and Legal department, system administrator, member of Supervisory Board, etc; moreover the Data Controller could be transferred the personal data to these following third parties:

- technical service suppliers (e.g. accountant consultant)
- information technology companies
- Insurance companies
- Insurance and welfare found companies
- Travel companies
- Car companies
- Benefits & Rewards Services suppliers
- .....

## **DATA RETENTION**

EPS maintains your personal data as long as necessary to perform the purpose for which the data are gathered.

## **DATA SUBJECTS RIGHTS**

Data Controller shall provide the data subjects the exercise of the following privacy rights:

- confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data, as required by the 15 article of GDPR (Right of access);
- rectification of inaccurate personal data concerning him or her or integration of him or her incomplete personal data (Right to rectification);
- erasure of personal data concerning him or her, in accordance with the reasons described in the article 17 of GDPR (Right to be forgotten);
- restriction of processing, when one or more of the cases provided by the article 18 of GDPR (Right to restriction);
- receive the personal data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Right to data portability)

Moreover, the user has the right to make opt-out of consent of data processing, anytime, without prejudice to the lawfulness of the processing based on the consent given before the opt-out.

To exercise your rights, you and send an email with the following subject “PRIVACY”, to [privacy@engie-eps.com](mailto:privacy@engie-eps.com).

The data subject can claim Privacy Authority, when he believes the data processing is carried out in violation of the Regulation. Further information is available on the website <http://www.garanteprivacy.it>.

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