

In accordance with Italian and European data protection legislation (EU Regulation 2016/679), the processing of information relating to users of the services offered by Acquedotto Pugliese S.p.A. will be based on the principles of fairness, lawfulness and transparency, in order to safeguard the confidentiality of personal data and the rights of data subjects.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)

Data Controller

The Data Controller for the services provided is Acquedotto Pugliese S.p.A. (hereinafter also referred to as "AQP" or "the Controller"), with registered office at Via Cognetti 36, 70121 Bari.

The Data Controller safeguards the confidentiality of personal data and ensures the necessary protection against any event that could put it at risk of breach.

To this end, the Data Controller implements policies and procedures relating to the collection and use of personal data and the exercise of the rights granted to you under applicable legislation. The Data Controller ensures that the policies and procedures adopted for the protection of personal data are updated whenever necessary and, in any event, in the event of regulatory or organisational changes that may affect the processing of your personal data.

Data Protection Officer

The Data Protection Officer (DPO) is a member of the Acquedotto Pugliese S.p.A. Group. You may contact the Data Protection Officer (DPO) by:

- by completing the form available at the following link: <https://www.aqp.it/privacy-cookie/tutela-dati>;
- by sending an email to the following address: dpo@aqp.it.

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

The Data Controller collects and/or receives the following personal data, mainly of a general nature, relating to users of the services, including, but not limited to:

- Personal and contact details (first name, surname, tax code or VAT number, place and date of birth, physical and email addresses, landline and/or mobile telephone number, bank account number);
- Data relating to property assets (land registry details, purchase and tenancy agreements for the properties covered by the service provision, data relating to commercial and/or professional activities, certificates of inheritance, etc.);
- Browsing data (data relating to the device used to log in – model and operating system – to the online services offered by the Data Controller), IP address and cookies, for which reference should be made to the specific extended privacy notice published in the 'Privacy and Cookies' section of the institutional website;

All personal data is used to manage the supply contract and to comply with the legal and regulatory



obligations to which the Data Controller is subject in relation to the activities carried out, as well as to provide certain services at the explicit request of the data subjects and subject to the collection of specific consent.

Should the data subject voluntarily provide data falling within special categories within the meaning of Article 9 (for example, information on health) or criminal records data within the meaning of Article 10 of the Regulation, such data will be processed exclusively to the extent necessary to provide the requested services, comply with legal obligations or safeguard a right in court proceedings.

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

A) Registration on the corporate website (implementation of pre-contractual and contractual measures taken at the data subject's request):

accessing, following registration, the Data Controller's online portals ("MyAQP – Sportello On Line", "FontaninApp", "La Voce Dell'Acqua", aqpwateracademy.it, aqpwateracademyyoung.it, etc.) following the creation of a user account via the relevant registration forms, in order to use the services offered, share images, submit content (articles, contributions, etc.) for publication in AQP's online newsletter, and take part in events and/or training courses.

B) Newsletter and MyAQPaggiorna registration (Consent):

subscription to services that enable users to stay up to date with job opportunities and initiatives promoted by AQP via email, for those who explicitly request them.

C) Management of the contractual relationship (Performance of the Contract):

- conclusion of the service provision contract and fulfilment of pre-contractual, contractual, administrative, accounting and tax obligations arising from the existing relationship, including the provision of online services available on the Website (e.g. for the management of contract requests and account transfers) and the sending of communications aimed at the proper conduct of the contractual relationship (e.g. tariff updates, deadlines, concessions and services for customers);
- customer support, handling of complaints, fault reports and requests for information regarding services, including via dedicated numbers (the Faults Freephone Number and Sales Helpline), 'call me back' services, management of appointments at Front Offices (including via apps and dedicated services) and video appointments (the so-called Digital Counter);
- dispute resolution (breaches of contract, formal notices, settlements, debt recovery, arbitration, legal disputes, etc.);
- handling of claims for damages.

D) Consequential obligations arising from the contract, including regulatory obligations (statutory obligations):

the obligations with which the Data Controller must comply under the contract and the specific regulations governing it include, amongst others:

- keeping accounts;
- communications to public bodies and companies such as: local authorities, the tax authorities, debt collection agencies, insurance companies, ARERA, regional authorities, sectoral authorities, local health authorities (ASL), etc.

E) Simple and Generalised Access to Public Information (Legal Obligation):

the personal data provided will be processed exclusively for purposes relating to the procedural requirements associated with the processing of requests for simple and generalised civic access, in accordance with Legislative Decree No. 33/2013, as amended, Article 5(1) and (2).



F) Water Social Bonus (Legal Obligation):

management of the procedure relating to the automatic payment of the social water bonus to those entitled, in accordance with ARERA Resolutions (223/2021/R/com – 63/2021/R/com and subsequent amendments and additions), which the Data Controller is required to comply with in its capacity as Operator of the Integrated Water System (SII).

G) Customer satisfaction activities (Legitimate Interest and Legal Obligation):

Personal data is processed to assess the level of satisfaction with the services provided by the Data Controller, to comply with sector-specific regulatory requirements (e.g. ARERA regulations), which expressly require the Data Controller to assess the User's level of satisfaction and to submit the results in aggregated form to the relevant authorities, and in the Data Controller's legitimate interest in improving the services offered to customers. The processing of data (such as first name, surname, physical and email addresses, and landline and/or mobile telephone numbers) may take place via:

- email;
- text message;
- telephone contact, including automated calls;
- post;
- newsletters, for companies that have requested this service;
- social media.

H) Cybersecurity purposes (Legal Obligation):

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

I) Handling of fault reporting calls (Legal Obligation and Performance of the Contract):

The voice recording of the call and the personal data provided (in particular the mobile phone number) will be processed for the purpose of receiving and managing fault reports (emergency response), as well as to ensure the traceability of such reports, including by sending an SMS containing the reference number assigned to the case (traceability code). Such processing is necessary for the performance of the service provision contract and to fulfil the obligations regarding traceability and service quality established by the resolutions and current regulations issued by ARERA (Resolution 655/2015). For this purpose, neither the voice recording nor the sending of a text message containing the report's traceability code requires prior consent, as these are purely operational activities governed by the mandatory regulatory framework established by ARERA, with which the Data Controller is obliged to comply.

J) Recording of contractual telephone calls (Consent):

completion of contractual requests via telephone at the user's request and subject to their prior consent (including via 'call me back' services).

K) Management of CVs and applications submitted by users via the 'Work with us' section (Implementation of pre-contractual measures taken at the data subject's request):

data is collected to enable AQP to properly assess applications for selection procedures via registration on the dedicated portal; the full privacy notice is available both during registration and in the 'Privacy and Cookies' section of the institutional website. Unsolicited CVs (i.e. those sent



without any connection to a specific vacancy via contact channels other than the portal) will not be considered and will be deleted immediately.

3. NATURE OF DATA PROVISION AND CONSEQUENCES OF ANY REFUSAL

The provision of the personal data requested by AQP is necessary for the purposes set out above. Any refusal to provide the data required for these purposes may make it impossible to fulfil the user's requests, to provide other available services, or to properly fulfil contractual (or pre-contractual), statutory and/or regulatory obligations.

The legal basis for the processing of data necessary for the Data Controller to carry out its activities is set out in paragraph 2 above and consists primarily of statutory and regulatory obligations, the performance of a contract and the necessary pre-contractual measures.

In activities where the legal basis is AQP's 'legitimate interest' (Article 6(1) (f), GDPR – Recital C47, GDPR), the data will always be used in a manner that respects the rights and freedoms of data subjects, to assess and analyse, including anonymously, the opinions of service users in order to improve, supplement or modify the quality and range of services made available, as well as to adapt its business initiatives.

With regard, however, to services for which consent constitutes the legal basis, the data subject may withdraw at any time their consent by clicking on the dedicated 'unsubscribe' link found in *the footer* of every communication received or in a dedicated section of our website.

The provision of further data to AQP, other than that which is mandatory for the fulfilment of its legal or contractual obligations, is optional and does not affect the use of the services covered by the contract. Depending on the circumstances and, where necessary, on a case-by-case basis, users of the services will be informed as to whether the provision of personal data is mandatory or optional. Whether the provision of data is mandatory or optional will be highlighted by means of a notice or a specific symbol. Finally, it is reiterated that failure to provide optional personal data will not entail any obligation or disadvantage.

4. CATEGORIES OF PARTIES TO WHOM DATA MAY BE DISCLOSED

The personal data provided will be:

- processed by AQP staff specifically authorised to handle the procedures necessary for the provision of the requested service;
- disclosed to, and where necessary processed by, public authorities (e.g. municipal and regional authorities), the tax authorities, tax police bodies, the Guardia di Finanza, the Health Authority, supervisory and control authorities, and, in general, all bodies responsible for verifying and monitoring compliance with the obligations relating to the purposes indicated;
- third-party companies or other entities carrying out activities in the name and on behalf of AQP, duly designated as Data Processors pursuant to Article 28 of the GDPR.

In any event, no personal data will be disclosed or published except in the cases provided for by Italian and European legislation.

5. DATA TRANSFER

Personal data will not be transferred abroad to countries outside the European Union, unless those countries ensure an adequate level of protection for individuals, in accordance with the provisions of Article 45(1) of the GDPR.



6. METHODS OF PROCESSING

Personal data will be processed using automated and non-automated (paper-based) means, ensuring the use of appropriate security and organisational measures, as well as guaranteeing the confidentiality of the data itself.

Calls to the Customer Service Freephone Number (800.085.853) will be recorded only at the request of the data subjects, for concluding telephone contracts and for the better management of reports and/or complaints (to protect telephone operators and for AQP's defence in legal proceedings).

Calls to the Faults Helpline (800.735.735) will always be automatically recorded to comply with ARERA regulations (Resolution 655/2015).

7. DATA RETENTION PERIOD

The data collected will be retained for the entire duration of the services requested and, even after the termination of such services, for the fulfilment of any related or resulting legal obligations, unless explicit consent has been requested in relation to certain services offered; in the latter case, processing may continue until consent is withdrawn.

Some data may be retained in aggregated and anonymous form solely for statistical purposes or for the analysis and improvement of the services offered.

Therefore, the criteria used to determine the retention period are set out in:

- specific statutory provisions governing AQP's activities;
- 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, fiscal and accounting laws applies;
- where explicit consent has been given, processing may continue until such consent is withdrawn.

Finally, personal data may also be retained for as long as permitted by Italian law to protect AQP's legitimate interests (Article 2947, paragraphs 1 and 3 of the Italian Civil Code).

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

The User is entitled to all the rights provided for in Articles 15–22 of the GDPR, namely:

- a) to obtain confirmation as to whether or not personal data concerning them are being processed and, if so, to obtain access to such data and to all information relating to the processing itself;
- b) to have inaccurate personal data rectified without undue delay and to have incomplete data completed, including by providing a supplementary statement;
- c) to have their personal data erased 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 erased to comply with a legal obligation,
 - the data subject has withdrawn their consent;
- d) to have the processing restricted where one of the following applies:
 - if the accuracy of the personal data is contested, for the period necessary for AQP to verify such accuracy;



- if the processing is unlawful, the data subject objects to the erasure of the personal data and requests instead that its use be restricted;
- where the personal data are necessary for the establishment or exercise of a legal claim by the data subject in court or before judicial authorities, even though AQP no longer requires them for the purposes of processing;
- if the data subject has objected to the processing, pending verification as to whether AQP's legitimate grounds override those of the data subject;
- e) to receive, in a structured, commonly used and machine-readable format, the personal data concerning them and to transmit such data to another data controller without hindrance from AQP;
- f) to object, in whole or in part, to the processing on grounds relating to their particular situation (where personal data are processed for scientific or historical research purposes or for statistical purposes, the request to object may be rejected where the processing is necessary for the performance of a task carried out in the public interest);
- g) to withdraw, at any time, the consent given (in such cases, the withdrawal of consent does not affect the lawfulness of processing based on consent given prior to the withdrawal);
- h) to lodge a complaint with the Data Protection Authority (for further details on how to do so, please refer to the website: www.garanteprivacy.it).

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

9. CHANGES AND UPDATES TO THIS PRIVACY NOTICE

AQP will amend or simply update, in whole or in part, this data processing policy, including in light of changes to the laws or regulations governing this matter and protecting the rights of service users. Any amendments and updates will be made available to service users in the 'Privacy and Cookie Policy' section as soon as they are adopted.

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