

## Privacy policy pursuant to and for the purposes of Article 13 and 14 of Regulation (EU) 2016/679 (GDPR)

In compliance with Regulation (EU) 2016/679 (GDPR) and with the Italian legislation on the protection of personal data, we are hereby providing you, pursuant to Article 13 and 14 of the GDPR, with due information regarding the processing of the personal data you provide us for the Challenge “Call of idea”.

### 1. DATA CONTROLLER

Data Controller, pursuant to articles 4 and 24 of the GDPR, is CAP HOLDING SPA., with registered office in Via Rimini 38 – 20142 Milano, in the person of its pro-tempore legal representative. The Data Protection Officer (DPO) is identified by the Data Controller and can be reached by e-mail at: [dpo@gruppocap.it](mailto:dpo@gruppocap.it).

### 2. TYPE OF DATA PROCESSED

In relation to the purposes listed below, the processing activities concerns the following categories of personal data:

- Personal identification data and contact data such as first name, last name, e-mail, telephone number, address;
- Professional data such as professional experience, field of specialization, educational background and curriculum vitae and other similar information.

Personal Data are provided directly by the data subject or voluntarily shared upon registration for the participation in the “Call of Idea” challenge and related initiatives.

### 3. PROCESSING PURPOSE AND LEGAL BASIS

The personal data you provide will be processed for the following purposes:

- a) management and evaluation of the candidate's work;
- b) response to requests and communications about the Challenge that may be of interest to the data subject (e.g. awarding and delivering the prize to the winner);
- c) provision of any service requested by the data subject related to the Challenge (e.g. circumstances requiring clearer instructions);
- d) fulfilment of an obligation in accordance with the law, a regulation or Community legislation.

The processing for the purposes referred to in point a), b) and c) is necessary to fulfill the execution of the contract, through the acceptance of the terms and conditions of the Open Innovability® platform as well as through participation in the Challenge.

The processing for the purposes referred to in point d) is necessary to fulfill the legal obligations to which the Data Controller is subject.

### 4. COMMUNICATION OF DATA

The data may be communicated, by way of example, to the following categories of recipients:

- Gruppo CAP companies;
- subjects operating on behalf of the Data Controller as data processors, pursuant to art. 28 of the GDPR; these companies are allowed to use Personal Data only to the extent necessary to provide these services;
- third party companies that perform outsourcing activities as Autonomous Data Controller. These third parties (e.g. Enel) usually provide ancillary services to our business activities, such as the provision of Crowdsourcing platform.
- subjects that provide services for the management of the information system used by Cap Holding S.p.A. and for the management of the telecommunications networks (including e-mail, database management, platforms, App providers, call centers, etc.);
- competent authorities for the fulfillment of legal obligations and/or provisions of public entities, upon request.

The subjects belonging to the above categories act as Data Processors or operate in conditions of total independence as separate Data Controllers. In addition, CAP has signed a joint-ownership agreement with “Servizio Idrico Integrato” Companies for Information Technology services. The content of the agreement is available on request by contacting the Company at the following e-mail addresses: [privacy@gruppocap.it](mailto:privacy@gruppocap.it) or [dpo@gruppocap.it](mailto:dpo@gruppocap.it)

The list of Data Processors is constantly updated and available at the Data Controller's offices. The data will not be disseminated.

#### **5. TRANSFERS OUTSIDE EUROPEAN UNION**

Personal data will be stored and processed by the Controller within the European Union.

In the event of any processing of personal data outside the European Union, such processing shall take place only after adequate safeguards have been adopted, in accordance with mandatory regulations. In this case, the data subject may obtain a copy of the conditions underlying the possible transfer by sending an email to [privacy@gruppocap.it](mailto:privacy@gruppocap.it).

#### **6. PROCESSING METHODS AND DATA RETENTION**

The processing will be carried out by persons authorized by the Data Controller through electronic or manual means, with logic strictly related to the purposes indicated and, in any case, in such a way as to guarantee data security and confidentiality.

In compliance with the provisions of Article 5(1)(e) of the GDPR, data will be stored in a form that allows the identification of data subjects according to the following criteria:

- for a period of time not superior to the achievement of the purposes for which they are processed, unless otherwise provided for by regulatory or contractual obligations;
- in order to comply with specific legal or contractual obligations;
- where applicable and lawful, until such time as the data subject requests their erasure.

#### **7. RIGHTS OF DATA SUBJECTS**

Data subjects have the right, where applicable, to obtain at any time confirmation or otherwise of the existence of such data and to know its content and origin, verify its accuracy or request its integration or updating, or rectification (Articles 15 and 16 of the GDPR). In addition, data subjects have the right to request data erasure, restriction of processing, revocation of consent, portability as well as to lodge a complaint with supervisory authority and to object in any case, for legitimate reasons, to data processing (Art. 17 et seq. of the GDPR).

These rights may be exercised by written communication to be sent to [privacy@gruppocap.it](mailto:privacy@gruppocap.it) or [dpo@gruppocap.it](mailto:dpo@gruppocap.it). Data Controller, also through the designated structures, will take care of your request and provide you, without undue delay, with information regarding the action taken on your request.

**DATA CONTROLLER**  
**CAP HOLDING S.P.A.**