



INFORMATION ON THE PROCESSING OF PERSONAL DATA REGISTRATION

Ener2Crowd S.r.l. S. B. (hereinafter E2C or Data Controller) provides the Data Subject, i.e. the person to whom the personal data refer, with the following information pursuant to art. 13 of EU Regulation no. 2016/679 of 27 April 2016 (hereinafter GDPR), relating to the protection of natural persons with regard to the processing of personal data. The purpose of this information is to describe the characteristics of the processing carried out in relation to the personal data provided by the Data Subject and the measures taken in order to protect their rights.

The information is published on the Ener2Crowd website: www.ener2crowd.com (hereinafter referred to as the Website).

Data Controller

The Data Controller is Ener2Crowd S.r.l. S. B., with registered office in Corso Indipendenza n. 1, 20129 Milan - P.IVA 10585050965 - e-mail of the Data Controller: info@ener2crowd.com

Data subject to processing

The Data Controller essentially collects the following personal data:

- Personal data
- Contact details

Purpose of processing and storage period

Personal data will be processed for the following purposes:

- a) allow pre-registration to the platform. The data collected for this Purpose will be stored until the purpose is achieved and in any case for a period not exceeding 12 months from registration.
- b) subject to express consent, authorise the Data Controller to send periodic newsletters. The data collected for this purpose will be processed until consent is revoked and in any case for a period not exceeding 24 months.
- c) subject to express consent, authorise the Data Controller to send communications on the services offered by the platform. Communications will be made by e-mail and by telephone. The data collected for this purpose will be processed until consent is revoked and in any case for a period not exceeding 24 months.
- d) Pursuant to art. 130, paragraph 4 of Legislative Decree 196/03 there is a legitimate interest pursuant to Article 6 letter f) of EU Reg. 2016/679), unless objectioned, it is allowed to send soft spam communications, i.e. commercial information by e-mail to the e-mail address provided during registration, regarding the same type of product



and/or service (Soft Spam) similar to the service/object of the Loan Services Contract signed during registration.

Because the processing we carry out is lawful

The processing is lawful because it is based on the following legal bases:

- execution of pre-contractual measures adopted at the request of the Data Subject.
- consent of the Data Subject.
- on legitimate interest, pursuant to art. 130 paragraph 4 of Legislative Decree no. 196 of 30 June 2003 "Personal Data Protection Code" updated by Legislative Decree no. 101 of 10 August 2018: for the purposes referred to in point d).

Processing methods

Personal data are processed for the pursuit of the purposes indicated in this policy, both electronically and on paper.

Mandatory or optional nature of the provision of data

The provision of data for the Purpose set out in letter (a) is **mandatory** and refusal to provide the same will make it impossible for the Data Controller to proceed with registration on the Site.

The provision of data for the Purpose set out in letter (b) is **optional** and refusal to provide the same will make it impossible for the Data Controller to send newsletters.

The provision of data for the Purpose set out in letter (c) is **optional** and refusal to provide the same will make it impossible for the Data Controller to send communications on the services offered by the platform.

The provision of data for the Purpose provided for in letter (d) is **mandatory**, but it is possible to express the desire not to receive them.

Categories of subjects to whom personal data may be communicated

The processing of personal data provided to us may be carried out, in compliance with the principle of the strict indispensability of the processing:

- by the Data Controller's employees, who act and process the data under the authority and instructions of the Data Controller, pursuant to Article 29 of the GDPR or by the employees designated by the Data Controller, pursuant to Article 2 *quaterdecies* of Legislative Decree no. 101/2018.
- By natural or legal persons whose right to access the personal data of the Data Subject is recognized by legal provisions provided for by European Union law or Italian law, such as, by way of example, competent authorities and/or supervisory bodies for the fulfilment of legal obligations, and public administrations for their institutional



purposes.

- By natural or legal persons used by the Data Controller to carry out activities instrumental to the achievement of the Purposes (such as, for example, software suppliers, cloud partners, datacenters, IT consultants). Third parties who access the data will do so in compliance with current legislation on the protection of personal data and the instructions given by the Data Controller and will in any case be appointed by the Data Controller, External Data Processors.

A list of the Data Processors is available at the Data Controller's headquarters.

Dissemination of data

The processed data will not be disseminated under any circumstances.

Rights of the Data Subject

The GDPR grants the Data Subject specific rights and the latter, for each processing, may exercise the following rights:

- **Right of access:** you can obtain a copy of the personal data that the Data Controller is in possession of and that is being processed.
- **Right to rectification:** you can request to rectify the personal data stored by the Data Controller if they are not updated or correct.
- **Right to object** to the processing of personal data for Business Purposes: you can request that the Data Controller stop sending commercial communications at any time.
- **Right to object** to decisions based on exclusively automated processes: you can request not to be the recipient of decisions made on the basis of exclusively automated processes, including profiling activities.
- **Right to withdraw** a given consent: You can ask to withdraw your consent for a certain processing at any time.
- **Right to contact the Data Protection Authority:** you have the right to contact the Data Protection Authority if you have any doubts about the processing of personal data by the Data Controller.

The Data Subject may also exercise the following rights under certain circumstances:

- **Right to erasure:** you may request that the Data Controller erase the personal data of the Data Subject if the purposes of the processing have ceased and there are no legitimate interests or legal provisions requiring their continuation.
- **Right to object** to processing: you may request that the Data Controller cease to carry out a certain processing on the personal data of the Data Subject.
- **Right to restrict** processing: you have the right to request that the Data Controller restrict the processing operations on your personal data.



- **Right to data portability** : you have the right to obtain a copy of the data in a structured, commonly used and machine-readable format from another Data Controller.

To exercise each of the aforementioned rights, the Data Subject may send an e-mail or write to the following address specifying the request and providing the Data Controller with the information necessary for the correct identification of the sender (also attaching a copy of the identity document, if not already available to the Data Controller) to the following addresses:

- by mail: Ener2Crowd S.r.l. S. B. with registered office in Corso Indipendenza n. 1, 20129 Milan
- by e-mail: info@ener2crowd.com

E2C will respond within one month. If for some reason the Owner is unable to respond, it will provide a detailed explanation as to why it cannot comply with the request.

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