



## **Privacy Policy - Clients**

Gridspertise operates in a “Business to Business” context and doesn’t directly process data of final customers. We protect the privacy of the persons who represent our business clients, and those of their employees and collaborators with whom we come into contact. Likewise, we protect as Data Processors the data which our DSO clients entrust us in the context of the services provides. For more information on the last point, don’t hesitate to contact us.

Gridspertise protects personal data as part of its business, here follows the information on the processing of personal data by Gridspertise in its quality of data Controller.

### **1. Data Controller**

The controller of the personal data collected through the [www.gridspertise.com](http://www.gridspertise.com) website (“**Website**”) is Gridspertise S.r.l., with its registered office in via Ombrone 2, 00198 Rome, Italy VAT no. 15844561009, tax no. 16073691004 (“**Gridspertise**”).

### **2. Data Protection Officer**

Gridspertise has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: [dpo@gridspertise.com](mailto:dpo@gridspertise.com).

### **3. Personal Data Processed**

Gridspertise will process the personal data required for the standard management of business-to-business (“B2B”) relations and in particular those necessary for the conclusion and management of contracts and commercial communications, such as the identification and contact data of legal representatives, employees and internal contacts, which are communicated by the individuals involved or by the company with whom the relevant contract is concluded or the business exchange carried out.

The provision of personal data is required for the conclusion and execution of the contract; therefore, the refusal of such data may cause the impossibility for Gridspertise to enter into the contract or to do business with the reference company.

### **4. Purposes and legal basis of processing**

The following table lists the purposes for which the personal data will be collected and processed by Gridspertise, as well as the legal basis of processing:

Purposes	Legal Basis
Enter into the contract and manage the contractual relationship with the reference company	Performance of a contract
Fulfill legal obligations, for example those deriving from the accounting and tax regulation	Legal obligation
In the context of the contractual relationship with the company, perform market researches and send commercial communications of Gridspertise's products and services, also through automatic means (ex. e-mails), to the reference persons of the company already in contact with Gridspertise's personnel	Legitimate interests
Send newsletters to the reference persons of the company already in contact with Gridspertise's personnel, containing industry news of the sector in which Gridspertise operates	Legitimate interests
Conduct surveys of customer satisfaction or concerning Gridspertise's business	Legitimate interests
Send invitations to events, projects or initiatives organized or participated by Gridspertise	Legitimate interests

The provision of personal data is necessary in all cases where the processing is carried out on the basis of a legal obligation, in order to perform a contract or the execution of pre-contractual measures adopted at request. The refusal to provide personal data may make it impossible for Gridspertise to process the request or enter into the contract.

The provision of personal data is voluntary for the pursuit of additional purposes, and the failure to provide your consent in relation to them will have no consequences on the conclusion of the contract.

It is always possible to object to the communications regarding events, surveys, newsletters and other informative or commercial content, by communicating it to the Gridspertise contact person who manages the reference contract, or by writing to the contact details available in the section "Data subjects' rights" of this privacy notice.

## 5. Recipients of data

Your personal data can be communicated or made accessible:

- a) To subjects which shall receive such data on the basis of the fiscal and accounting regulation in force;
- b) to employees and contractors of other companies or other subjects which carry out outsourcing activities on behalf of Gridspertise (ex. management of IT systems), in their capacity as data Processors.

## 6. Data transfers

Your personal data will be processed and stored within the European Union. The same data may be processed in countries outside the European Union, provided that an

adequate level of protection is guaranteed, recognized by a specific adequacy decision of the European Commission.

Any transfers of Personal Data to non-EU countries, in the absence of a European Commission adequacy decision, will only be possible if data Controllers and data Processors involved provide adequate guarantees of contractual nature, including Binding Corporate Rules and Standard Contractual Clauses.

The transfer of your personal data to third countries outside the European Union, in the absence of an adequacy decision or other appropriate measures as described above, will be made only if you have explicitly consented to it or in the cases provided for by the applicable data protection law and will be processed in your interest. In these cases, we inform you that, although Gridspertise adopts measures common to all the countries in which it operates, the transfer of your personal data may be exposed to risks related to the peculiarities of local legislation regarding the processing of personal data.

## **7. Data retention period**

The personal data processed for the above-mentioned purposes will be retained in compliance with the principles of proportionality and necessity and deleted or anonymized after the retention period. For example, the navigation data such as the IP address will be processed for the duration of your navigation session and can be retained for few days in order to ascertain any liability in case of unlawful use of the website. For more information about cookies, you can consult our cookie policy.

In case your consent is required for any processing, the related data will be stored until the fulfillment of the purposes of processing, or until the withdrawal of the consent.

## **8. Data subject rights**

Pursuant to the data protection law, you have the following rights on your personal data:

- a) to request access and a copy of your data
- b) to request rectification
- c) to request erasure
- d) to obtain restriction of processing
- e) to object to the processing
- f) to receive the personal data in a structured, commonly used, and machine-readable format

Some rights may not apply in relation to the specific processing. In any case, you have the right, at any time, to object to the processing of your personal data for the purpose of pursuing Gridspertise's legitimate interests. In this case, the processing will be stopped, except where Gridspertise's legitimate interests prevail on the interests of the data subject.

To exercise your rights, or withdraw any consent given for the processing of personal data, you can write an e-mail to [privacy@gridspertise.com](mailto:privacy@gridspertise.com) specifying in the subject of the request "Gridspertise – Data subject's rights".

## **Right to lodge a complaint**

It is your right to submit a complaint to the competent data protection Authority, which in Italy is the Garante per la Protezione dei Dati Personali. For more information you can visit the Authority's website at the following address: <https://www.garanteprivacy.it/>.