



PRIVACY POLICY – CUSTOMER SUPPORT AND CALL CENTER

Art 13-14 EU Reg 2016/679

Pursuant to Articles 13 and 14 of European Regulation No. 2016/679 (hereinafter "the Regulation"), we provide you with the following information regarding the processing of personal data you provide when contacting our call center.

1. Data Controller

The Data Controller is IPlanet S.p.A., with registered office in Rome, Via Salaria 1322, 00138. The Data Protection Officer (DPO) can be contacted at the above address or via email at: dpoitalianapetroli@pec.gruppoapi.com.



2. Personal Data

Personal data means any information that relates to you and is attributable to you. Specifically, the personal data acquired are those provided by you when contacting the Data Controller's Customer Service, i.e. collected as part of commercial, technical, contractual and customer care services with the help of IT means. In particular, the following personal data will be collected and processed: contact data, name, surname, personal data, e-mail; content of the request; recording and transcribing of the phone calls received, only and only in the event that you choose to speak with an operator. Any interest in the collection and/or recording of particular or judicial data is excluded, therefore we invite you not to provide this information during phone calls with operators. Any communication of special data will be processed by the Data Controller only if they are provided to manage your request.

3. Purpose and legal basis of the processing

Your Data will be processed for the following purposes and on the assumption of the following legal bases:



 PURPOSE OF THE PROCESSING	 LEGAL BASIS OF TREATMENT
1) To follow up on customer requests that contact the support service	the processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same (Art. 6 para. 1 lit. b GDPR)
2) Only and limited to recorded calls, the evaluation of the quality of the service and the measurement and monitoring of the level of customer satisfaction, to improve customer service services.	Consent of the data subject (Art. 6 para. 1 lit. a GDPR)
3) Protect the company in case of disputes or complaints	the processing is necessary for the purposes of the legitimate interest pursued by the controller (Art. 6 para. 1 lit. f GDPR)

4. Nature of the provision of Data

In relation to the purpose referred to in point 3.1), the provision of your Data is a necessary requirement to respond to your request and provide you with the relevant service and support: failure to provide even partial your Data or the subsequent request for cancellation will make it objectively impossible to carry out the activities indicated above, being able to contact the customer service via web-form on the institutional website <https://iplanet.eu/contattaci>.

Recording and transcribing the phone call is optional. Upon receipt of the call, the user will be notified of the recording of the call and the purposes of the processing, with reference to this information for more information and may, if he wishes, continue the call, thus giving his consent to the recording or hang up by not giving consent and being able to contact the customer service via web-form on the institutional website [https:// iplanet.eu/contattaci](https://iplanet.eu/contattaci).



5. Processing methods

Within the scope of the purposes indicated in point 3 above, the processing of your Data will take place by electronic means, in compliance with the regulatory provisions on the processing of personal data, adopting the appropriate security measures.

The processing of your Data will be managed by internal staff of IPlanet S.p.A., specifically authorized pursuant to European Regulation 2016/679, trained and instructed to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorized parties.

6. Communication and dissemination of Data

For activities related to processing operations related to the purposes described above and for activities related to the management and maintenance of IT systems, the Data may be processed by companies specifically appointed as Data Processors.

The updated list of subjects involved in the processing operations, who will act as Data Processors or in any case as specifically appointed authorized persons, is available at the Data Controller's headquarters, which can be requested, also by e-mail, at the addresses indicated in this policy.

It should be noted that the data in question will not be subject to dissemination unless this is required by law.

7. Data retention period

The telephone recordings will be kept for a period of 6 (six) months from the acquisition of the call, without prejudice in any case to the possibility of revocation of consent as per point 8 below). After these deadlines, except in cases where there is an ongoing dispute, they will be destroyed.

The data relating to the customer and the content of the requests for assistance will be processed in digital format by the Data Controller and - unless cancellation is requested as per point 8) below - will be stored in compliance with the principles of proportionality and necessity, and in any case until the purposes of the processing have been pursued and in compliance with any legal obligations envisaged.

In the event of a contractual relationship with the Data Controller, the Personal Data will be stored and processed for the entire duration of the same and in any case for a period of 10 years from the termination of the contractual relationship, after which they will be deleted, without prejudice to the further storage of the same where necessary to comply with specific legal obligations, to provisions of the Authority, for the collection of residual receivables and for the management of disputes, complaints and legal actions.



8. Rights of the data subject

With reference to your Data, we inform you that, in relation to the aforementioned processing, you may, at any time, exercise the rights referred to in art. 15 et seq. of European Regulation 2016/679, including the right to ask the data controller for access to personal data and the rectification or deletion of the same or the limitation of the processing concerning him/her or to object to their processing, as well as the right to data portability in the cases provided for by law.

The exercise of your rights and/or for any clarifications on the subject of personal data protection may be made by sending an e-mail request to the privacy@iplanet.eu address or by writing to the Data Controller's headquarters at the addresses indicated above.

9. Complaint

In the event of violation of current legislation protecting confidentiality and personal data, you are also entitled to lodge a complaint with the Data Protection Authority whose contact details can be found on the www.garanteprivacy.it website.

10. Transfer of Data abroad

Your Data are stored at the headquarters of IPlanet S.p.A. and on servers located in the European Union.

IPlanet reserves the right to modify, update, add or remove parts of this privacy policy at its discretion and at any time. The updated text will always be available on the <https://iplanet.eu/contattaci> website

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