

# CLIENT PRIVACY NOTICE

(Art. 13 Regulation EU 2016/679 GDPR)

Dear Client,

In this notice we aim to explain simply and transparently how we collect, use and protect your personal data, and what your rights are.

## WHO WE ARE

The Data Controller is **Centro Gas S.r.l.**

<i>Registered Office</i>	3/B Via dell'Olivo, 57025 Piombino (LI)
<i>Email</i>	info@centrogasenergia.it
<i>Telephone</i>	+39 0565 49409

## WHAT DATA WE PROCESS

Depending on the service requested, we may process:

- **Identification data and contact details** (name, surname, address, telephone, email, tax code, VAT Code);
- **Contractual and technical data** (client code, POD/PDR, supply address, consumption data, contract number, type of installation, type of service requested);
- **Payment data** (IBAN, banking details, payment history, any arrears);
- **Data relating to purchasing interests and preferences** (type of products purchased or requested, for example LPG cylinders, tanks, accessories, technical gasses, solar PV systems, electricity or methane);
- **Communication data** (email, contact history, support requests, responses to promotional or informational campaigns).

## FROM WHOM DO WE RECEIVE DATA

Data that are directly provided by you or, in some cases, from third parties acting on your behalf (e.g. authorised points of sale, installers, business partners or contracted technicians).

## WHY DO WE PROCESS YOUR DATA

<i>Management of the supply of gas, electricity and other energy services</i>	<p>We process your <b>identification data and contact details</b> (name, surname, address, telephone, email, tax code, VAT Code), as well as <b>contractual and technical data</b> (client code, POD/PDR, supply address, type of installation, consumption, payment method), <b>to activate and manage the supply</b> of LPG gas, electricity or methane, and to provide any other related services such as the delivery of cylinders, installation of tanks or solar PV systems.</p> <p><b>Legal basis:</b> required for the performance of the contract or precontractual measures (art. 6(1)(b) GDPR).</p> <p>Notification of these data is mandatory; in the absence of such, we will not be able to provide the services requested.</p>
<i>Administrative, accounting and tax obligations</i>	<p>We use your <b>personal details and payment details</b> (name, address, IBAN, banking details, payment details) to comply with legal obligations concerning accounting, civil and tax matters, such as <b>maintaining accounting records and issuing invoices</b>.</p> <p><b>Legal basis:</b> a legal obligation to which the Data Controller is subject (art. 6(1)(c) of the GDPR).</p> <p>Notification of these data is mandatory; in the absence of such, we will not be able to provide the services requested.</p>
<i>Service communications and operational notices</i>	<p>We process your <b>contact details</b> (telephone, email) to inform you of contractual changes, tariff updates, planned outages, maintenance or other <b>communications required for the proper provision of the service</b>.</p> <p><b>Legal basis:</b> required for the performance of the contract (art. 6(1)(b) of the GDPR).</p> <p>Notification of these data is mandatory; in the absence of such, we will not be able to send you the service notifications necessary for the performance of the contract.</p>

<i>Soft marketing (so-called soft spam)</i>	<p>We process your <b>contact details</b> (name, email) to send to you, at the email address provided at the time of a previous supply or purchase, communications concerning products or services similar to those already purchased, such as promotions on LPG cylinders, solar PV systems, pellets or heating accessories.</p> <p><b>Legal basis:</b> legitimate interest of Data Controller (art. 6(1)(f) of the GDPR and art. 130(4) of Legislative Decree 196/03).</p> <p>You may object to this processing at any time, without providing reasons, by writing to <a href="mailto:info@centrogasenergia.it">info@centrogasenergia.it</a>.</p>
<i>Consent-based marketing</i>	<p>We process your <b>contact details</b> (telephone, email, address) only after obtaining your <b>express consent</b> to send you <b>promotional offers</b>, newsletters or business communications on all our products and services, including by SMS or calls. If we have not obtained your consent, we will not process your data for this purpose.</p> <p><b>Legal basis:</b> consent of interested person (art. 6(1)(a) of the GDPR).</p> <p>The refusal to provide consent will not prejudice the provision of the contractual services. Consent may be revoked at any time.</p>

## TO WHOM DO WE COMMUNICATE THE DATA

<i>Tax authority</i>	Revenue Agency, local authorities, etc., for the submission of computerised declarations, tax returns, mandatory communications.
<i>Banking and financial institutions</i>	To effect payments, deposits or financial compliance obligations.
<i>Suppliers of information technology services</i>	<p>External parties providing IT services to our company (e.g. client management software, cloud services, hosting, technical support and systems maintenance).</p> <p>These also include the platform for dispatch of the newsletter used for the management of informational and promotional communications.</p> <p>These parties act as data processors on our instructions and have been contracted pursuant to art. 28 of the GDPR.</p>
<i>Suppliers and business partners</i>	Your data may be communicated to third-party suppliers of services related to the supply of gas, electricity or other energy products (for example local distributors, network managers, companies for the maintenance or installation of solar PV systems, companies that deliver and refill cylinders and tanks).

	These parties process data exclusively for purposes related to the provision of the requested services or the proper fulfilment of contractual and regulatory obligations.
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Processing takes place primarily within the European Economic Area (EEA).  
In the case of use of the newsletter programme, **data may be transferred to the United States.**

Such transfer is effected pursuant to the **EU-USA Data Privacy Framework** or, alternatively, through **standard contractual clauses** approved by the European Commission (arts. 45 and 46 of the GDPR), which ensure an adequate level of protection.

## FOR HOW LONG DO WE STORE THE DATA

<i>10 years</i>	We store your data for 10 years from the end of the relationship, in compliance with tax, civil and accounting obligations as required by law (e.g. art 2220 of the Civil Code, art. 2946 of the Civil Code. – ordinary prescription).
<i>More than 10 years</i>	We may store your data for more than 10 years where there is ongoing litigation, at the request of judicial authorities or for other legitimate reasons.
<i>24 months</i>	We may send you business communications for the 24 months following your last purchase (in the case of soft marketing), or from the time your consent was provided (for direct marketing). You may nevertheless exercise your right to object or withdraw consent at any time, to discontinue such processing activities.

## WHAT ARE YOUR RIGHTS

The European General Data Protection Regulation (GDPR) guarantees you a series of rights, which you may exercise without any formality, by using the email and telephone details shown above.

<i>Right of access</i>	You have the right to know whether your personal data are being processed and to be informed of: the origin of the data; the categories of data processed; the recipients; the purpose of processing; the existence of an automated decision-making process, including profiling; the period for which data may be stored.
<i>Right to rectification</i>	If your data are not accurate, up to date or complete, you have the right to request the data be rectified and/or completed and you may request that

	the Data Controller informs recipients to whom the data have been disclosed, unless this is impossible or requires a disproportionate effort.
<i>Right to erasure</i>	You have the right to erasure of your data in circumstances provided for in art. 17 of the GDPR and in any event when: they are no longer necessary for the purposes for which they were collected; you have withdrawn your consent for processing and no other valid legal basis exists; you object to processing and the Data Controller has no overriding interest; the data are being processed unlawfully; erasure is necessary to comply with a legal obligation. You have the right to request that the Data Controller inform any recipients of the data, unless this is impossible or requires a disproportionate effort.
<i>Right to restriction of processing</i>	You have the right to request the restriction of processing of your personal data when: you dispute the accuracy of the data, for the period required to verify the data; if the processing is unlawful but you do not wish the data to be erased; when the Data Controller no longer requires the data but you wish the data to be retained to exercise a legal right; when you have objected to processing, pending verification that the Data Controller's interests take precedence over yours. You have the right to require that the Data Controller notify any recipients of the data of such restriction, unless this is impossible or requires a disproportionate effort.
<i>Right of portability</i>	When processing of your personal data is based on your consent or is required for the performance of a contract and is effected by automated means, you have the right to receive your data in a structured, commonly used format or to request that such data be transferred to another Data Controller, where technically possible.
<i>Right to object</i>	You may object to the processing of your personal data carried out based on the legitimate interests of the Data Controller or on public interest grounds, for reasons related to your particular circumstances. You may object to the processing of your personal data carried out for marketing purposes without needing to provide reasons for such objection.
<i>Right to revoke consent</i>	You may at any time revoke consent given for the processing of your data.
<i>Right to lodge a complaint</i>	In the event you consider your rights have been violated, you may lodge a complaint with the Italian Data Protection Authority.