

INFORMATION DOCUMENT ON PERSONAL DATA PROCESSING
Pursuant to art. 13 of Legislative Decree no. 196 of June 30, 2003

Gruppo Banca Leonardo S.p.A. (hereinafter referred to as “**GBL**”), the parent company of Gruppo Banca Leonardo, acting in its capacity of Authorized Company for data processing, informs you on the use of your personal data and on the protection of your rights, under art. 13 of Legislative Decree no. 196 of June 30, 2003 (hereinafter referred to as “*Privacy Code*”).

1. SOURCE OF PERSONAL DATA

Your personal data is directly collected from you or from third parties (for example at the time of transactions ordered by other parties on your credit or debit or during information gathering at the time of application for loans or in the event where GBL gathers data from independent companies for commercial information purposes, market research, direct offers of products or services).

2. SENSITIVE DATA

Specific transactions or special products requested by you may lead to the gathering and processing of data that the *Privacy Code* deems “sensitive”, since religious and political beliefs and, in general, information on your health status will emerge from it. The processing of said data is subject to obtaining your specific expression of written consent.

3. AUTHORIZED COMPANY FOR DATA PROCESSING

The Authorized Company for data processing is Gruppo Banca Leonardo S.p.A. or, in short, GBL S.p.A., with its registered office at 20121 Milan – Via Broletto n. 46, fiscal code, number of VAT registration and number of enrolment with the Company Registry of Milan 09535880158, registered under no. 5412 of the Register of Banks and parent company of Gruppo Banca Leonardo, in turn registered under no. 3126 of the Register of Banking Groups.

4. AUTHORIZED PEOPLE FOR DATA PROCESSING

The names of the Authorized People for data processing are laid down in a list kept by GBL and available upon request.

5. PROCESSING PURPOSES

Your personal data may be processed for the following purposes:

- a) Purposes related to obligations provided for by law, by rules and by EC regulations, as well as by instructions given by supervisory and controlling authorities and entities. The disclosure of personal data required for this purpose is compulsory and the resulting processing does not require your consent;
- b) Purposes strictly related and instrumental to the management of relationships with the clients (for example gathering of information prior to the execution of a contract, performance of transactions based on obligations resulting from the contract, checks and assessments of the results and performance of the relationships, as well as the relevant risks etc.). The disclosure of the personal data required for such purpose is not compulsory, but refusal to supply it may lead to GBL not being able to supply its service. Its processing does not require your consent, since asking GBL for specific services or transactions that require the above-mentioned processing shall be understood as the expression of your consent;

c) Purposes in line with GBL's business, such as:

- the promotion and sale of products and services of GBL, of Gruppo Banca Leonardo and of third-party companies (implemented through the dispatch of publicity material, phone or postal communications and through the use of automated communication systems, *short text messages, e-mails, faxes*);

- survey of the degree of customer satisfaction – carried out by GBL, by Gruppo Banca Leonardo or by third-party companies (through personal or phone interviews, distribution or dispatch of questionnaires) – on the quality and type of services supplied and, in general, on the activity carried out;
- processing of studies and market research (made through personal or phone interviews, distribution or dispatch of questionnaires);
- performance of PR activities.

The disclosure of the personal data required for the performance of said activities is not compulsory and its processing requires your consent.

6. PROCESSING METHOD

The processing of your personal data is made manually or with the aid of electronic or automated, IT and computer tools, under logics that are strictly linked to the purposes themselves and, in any case, so as to ensure the security and confidentiality thereof.

7. CATEGORIES OF SUBJECTS TO WHOM DATA MAY BE NOTIFIED

Your personal data may be notified by GBL, for the above-mentioned purposes, to other subjects, including foreign ones, that are part of the following categories:

- companies belonging to Gruppo Banca Leonardo or subsidiaries and/or associated companies;
- trustworthy third parties, that GBL engages for the performance of services of payment, insurance, management of tax collection and treasury, banking and financial brokerage, issue and management of credit cards and other commercial products of the Bank, preparation of letters related to payments of bills, checks and other securities, transmission, printing, putting into envelopes, transporting and sorting out of the communications to the clients, filing and disposal of the documentation, obtainment of title searches, management of national and international systems for the control of frauds against banks and financial brokers, debt collection, auditing and audit reporting, support and professional advice, development, management, protection and security of the IT system of the Bank and of the telecommunication networks;
- factoring companies;
- subjects that take on financial risks and, as a consequence, carry out a centralization service of banking information relating to clients applying for loans;
- subjects that GBL engages for the activities of commercial development (promotion of products and/or services of GBL or of other companies, survey of the degree of customer satisfaction and of customer expectations, market research to find the existence of potential demand for other products or services, public relations).



All the subjects that are part of the above-mentioned categories will use said data in their capacity as independent Authorized Companies or People for data processing under contractual agreements with GBL for the outsourcing of certain services.

People such as employees, collaborators, advisors, employees of external companies that are part of the list below in charge of central services and/or offices, the sales network (branches), structures carrying out technical, support (such as legal services, shipments, archives, IT services) or corporate control services may also become aware of your data.

The updated list of inter-group Authorized people, third-party Authorized people and independent authorized people are available at GBL's premises open to the public.

Your personal data is not subject to distribution.

8. RIGHTS OF THE PERSON CONCERNED

At any time you may:

- obtain confirmation whether or not your personal data exists, even if not yet registered, and intelligible communication thereof;
- obtain indication of the origin of data, purposes and methods on which the processing is based, of the subjects or categories to which your data is disclosed or that may become aware of your data in their capacity as Authorized people;
- obtain the update, adjustment, supplement of the data as well as the cancellation, anonymity and blocking of data processed in breach of law;
- reasonably object, fully or partly, against the processing of your personal data, even if relevant to the purpose of collection and to any and all processing for commercial information purposes or for carrying out market research.