

NOTICE TO NATURAL PERSONS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016

The Regulation on the “protection of natural persons with regard to the processing of personal data and on the free movement of such data” (hereinafter the “Regulation” or “GDPR”) contains a series of rules which aim to guarantee that the processing of personal data takes place in compliance with the fundamental rights and freedoms of persons. This Notice incorporates the provisions thereof.

SECTION 1- Identity of the data controller

Intesa Sanpaolo Innovation Center S.p.A. (hereinafter the “Company” or “Data Controller”), having its registered office in Corso Inghilterra 3 – 10138 – Turin, a company of the Intesa Sanpaolo Group (hereinafter the “Group”), in its capacity as Data Controller processes your personal data (the “Personal Data”) for the purposes indicated below.

SECTION 2 - Categories of data processed, Purposes and Legal basis of the processing

Categories of Personal Data

Included among the Personal Data that the Company processes, by way of example, are personal and contact details.

Sources of Personal Data

The Company uses the Personal Data that concerns you, which you communicated to the Bank or collected from other Data Controllers (in the latter case subject to checking compliance with the conditions of lawfulness by third parties) or public sources (i.e. the Chamber of Commerce) in compliance with the reference regulations.

Purpose and legal basis of the processing

Your Personal Data are processed by the Company as part of its activities for the following purposes:

a) Provision of services and execution of contracts

The provision of your Personal Data needed to perform the services requested and execute the contracts (including deeds in a pre-contractual phase) is not mandatory by law, but refusal to provide such Personal Data makes it impossible for the Company to fulfil requests.

b) Compliance with national and EU provisions

The processing of your Personal Data to comply with regulatory provisions is mandatory and your consent is not required.

The processing is mandatory, for example, when it is required by anti-money laundering, taxation, anti-corruption, fraud prevention regulations in the payment services or to fulfil instructions or requests of the supervisory and control authority (such as monitoring of operational and credit risks at banking group level).

c) Direct and indirect marketing and profiling

The processing of your Personal Data,

- to perform activities aimed at the promotion and sale of products and services of companies belonging to the Intesa Sanpaolo Group or third party companies through letters, by telephone, Internet, SMS and other communication systems;

- to conduct market and customer satisfaction surveys through letters, by telephone, Internet, SMS and other communication systems;
- to evaluate and predict aspects concerning, among others, interests, preferences, consumption choices and habits, in order to offer increasingly targeted and adequate products and services, in particular through the analysis, processing of your information (for example current account transactions, changes in the financial situation, location and movements) and the identification of categories (clusters)

is optional and your consent is required.

d) Legitimate interest of the Data Controller

The processing of Personal Data is necessary to pursue a legitimate interest of the Company, i.e.:

- to prevent fraud;
- to acquire images and videos relating to the CCTV system for security purposes;
- to pursue any and additional legitimate interests. In the latter case, the Company may process your Personal Data only after having informed you and having ascertained that achieving its legitimate interests or those of third parties does not compromise your rights and fundamental freedoms, and if your consent is not required.

SECTION 3 - Categories of recipients to whom your personal data may be communicated

To achieve the purposes indicated above, it might be necessary for the Company to disclose your Personal Data to the following categories of recipients:

- 1) **Intesa Sanpaolo Group Companies** and subsidiaries.
- 2) **Third parties** (companies, freelancers, etc.) operating within and outside the European Union and that process your Personal Data as part of:
 - banking, financial and insurance services, payment systems, revenue offices and treasuries;
 - recording the financial risks for the purpose of preventing and controlling the risk of insolvency;
 - loan recovery and related activities;
 - providing and managing IT procedures and systems;
 - security and CCTV management services;
 - auditing and consultancy activities in general;
 - managing communication with customers, as well as the storage of data and documents, whether in paper or electronic form;
 - recording of service quality, market research, information and commercial promotion of its products and/or services;
- 3) **Authorities** (for example, legal, administrative, etc.) and public information systems at public authorities, such as the Central Credit Register at the Bank of Italy.

The companies of the Intesa Sanpaolo Group and the third parties your Personal Data may be communicated to, act as: 1) Data Controllers, i.e. parties which determine the purposes and means of the Personal Data processing; 2) Data Processors, i.e. parties which process the Personal Data on behalf of the Controller or 3) Joint Data Controllers, which determine, together with the Company, the relevant purposes and means.

The updated list of the subjects identified as Data Controllers, Data Processors or Joint Data Controllers is available by sending a specific request to the Company.

SECTION 4 - Transfer of Personal Data

Your Personal Data are processed by the Company within the European Union (EU) and are not disseminated. If necessary, for reasons of a technical or operational nature, the Company reserves the right to transfer your Personal Data to countries outside the European Union or to international organisations for which there are “suitability” decisions of the European Commission, or based on suitable guarantees provided by the country where the data must be transferred or based on specific exemptions required by the Regulation.

SECTION 5 - Processing method and Storage period of the information

Your Personal Data will be processed using manual, IT and electronic tools and in a way that ensures its security and confidentiality.

Your Personal Data is generally stored for a time period of 10 years starting from the termination of the contractual relationship you are part of. Likewise, the Personal Data may be processed for a longer time, in the event of an act that interrupts and/or suspends the provision that justifies the extension of the data storage.

SECTION 6 - Rights of the data subject

In your capacity as Data Subject, you may exercise, at any time, towards the Data Controller, the rights provided by the Regulation listed below, by sending a specific request in writing to the e-mail address dpo@intesanpaolo.com or to the certified e-mail address privacy@pec.intesanpaolo.com; or via post to the address Intesa Sanpaolo S.p.A., Piazza San Carlo, 156 – 10121 Turin, Italy.

With the same methods, you may revoke at any time the consent expressed with this Notice.

Any communications and actions undertaken by the Company in connection with exercising the rights listed below, will be made free of charge. However, if your requests proved to be demonstrably unfounded or excessive, in particular due to their repetitive character, the Company may charge you a fee, taking into account the administrative costs incurred, or refuse to meet your requests.

1. Right of access

You can request confirmation from the Company about whether your Personal Data is being processed or not and, in this case, obtain access to the Personal Data and the information envisaged under Article 15 of the Regulation, among which, by way of example: the purposes of the processing, the categories of Personal Data processed etc. If the Personal Data is transferred to a third country or to an international organisation, you have the right to be informed of the existence of suitable guarantees relating to the transfer, as specified in Section 4. If requested, the Company shall provide a copy of the personal data undergoing processing. For any further copies, the Company may charge a reasonable fee based on administrative costs. If the request in question is submitted via electronic means, and unless otherwise specified, the information will be provided by the Company in an electronic format of common usage.

2. Right to rectification

You may obtain from the Company the rectification if your Personal Data are inaccurate, and, taking into account the purposes of the processing, have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure

You may request from the Data Controller the erasure of your Personal Data, if there is one of the reasons under Article 17 of the Regulation, including, by way of example, if the Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed.

We hereby inform you that the Company may not erase your Personal Data if its processing is necessary, for example, to fulfil a legal obligation, for reasons of public interest, to verify, exercise or defend a right in a law court.

4. Right to restriction of processing

You may obtain the restriction of your Personal Data if one of the cases provided for by art. 18 of the Regulation applies, among which, for example:

- dispute as to the accuracy of your Personal Data, for the period required for the Data Controller to conduct the necessary checks;
- objection to the processing, pending the appropriate checks to be conducted by the Data Controller regarding the reasons that legitimise the same processing.

5. Right to data portability

If the processing of your Personal Data is based on the consent or is necessary for the performance of a contract or pre-contractual measures and the processing is carried out by automated means, you may:

- request to receive the Personal Data provided by you in a structured, commonly used and machine-readable format (e.g., a computer and/or tablet);
- transmit your Personal Data to another Data Controller without hindrance from the Company.

In addition, you may request that your Personal Data is sent by the Company directly to another data controller specified by you. In this case, you shall provide us with all the exact details of the new data controller to whom you intend to transfer your Personal Data, providing us with ad hoc written authorisation.

6. Right to object

You will have the right to object to the processing of Personal Data at any time if the processing is carried out for the performance of an activity of public interest or to achieve a legitimate interest of the Data Controller (including profiling).

Should you decide to exercise the right to object described here, the Company will abstain from further processing your personal data, unless there are legitimate grounds for the processing (grounds overriding the interest, rights and freedoms of the data subject), or the processing is necessary for the establishment, exercise or defence of legal claims in a court of law.

7. Automated decision-making relating to natural persons, including profiling

In the presence of the creditworthiness requirements and to set amount thresholds, the Company relies on automated decision-making processes, among others, to issue credit cards, for applications for personal loans and special-purpose loans, providing, in these cases, more details as part of specific information and acquiring, to this end, the explicit consent.

The Regulation grants the data subject the right not to be subject to a decision based only on the automated processing of your Personal Data, including profiling, which produces legal effects that concern you or significantly affect you, unless the above-mentioned decision:

- a) is necessary for the conclusion or performance of a contract between you and the Company;
- b) is authorised by the Italian or European law;
- c) is based on your explicit consent.

In the cases under letters a) and c), the Company will implement appropriate measures to protect your rights, your freedoms and your legitimate interest and you may exercise the right to obtain the human intervention by the Company, to express your opinion or dispute the decision.

8. Right to lodge a complaint with the Data Protection Authority

Without prejudice to any other administrative or judicial remedy, if you consider that the processing of your Personal Data by the Company infringes this Regulation or the relevant legislation, you shall have the right to lodge a complaint with the relevant Data Protection Authority.

*** **

NOTICE TO LEGAL PERSONS, ENTITIES OR ASSOCIATIONS

Intesa Sanpaolo Innovation Center S.p.A. hereby informs you that the use of automated systems for calling or communicating a call without the intervention of an operator and electronic communications (e-mail, telefax, SMS, MMS or other) for carrying out promotional or market research activities is permitted only with the consent of the entities that are parties to an electronic communication services supply contract (“contracting parties”: this definition also includes legal persons, entities or associations).
The pursuit of such activities directed towards these parties requires a specific expression of consent.

CONSENT BY THE DATA SUBJECT TO THE PROCESSING OF PERSONAL DATA

Considering the Notice issued pursuant to articles 13 and 14 of the Regulation, I acknowledge the processing of my Personal Data for the purposes described in the Notice, under letters a) and b) of Section 3 "Purposes and legal basis of the processing".

In addition, with reference to the processing for direct and indirect marketing purposes, under letter c) of Section 3 of the notice,

C2 **I give my consent** **I do not give my consent**

to the processing of my personal data for the purposes of commercial information, direct offers or market or customer satisfaction surveys regarding products and services of the Company and companies of the Intesa Sanpaolo Group;

C3 **I give my consent** **I do not give my consent**

to the processing of my personal data for the purposes of offering the products and services of the Company and of companies of the Intesa Sanpaolo Group, specifically identified based on my personal profile;

C4 **I give my consent** **I do not give my consent**

to the processing of my personal data for the purposes of commercial information, direct offers or market or customer satisfaction research regarding products and services of other companies

date and signature of the Data Subject or duly authorised representative

*** ** *

**CONSENT OF A LEGAL PERSON, ENTITY OR ASSOCIATION TO RECEIVING ELECTRONIC MESSAGES
RELATING TO PROMOTIONAL ACTIVITIES**

With regard to the "Notice to legal persons, entities or associations" which has been provided to us,

C5 **I give my consent** **I do not give my consent**

to the use of automated systems for calling or communicating a call without the intervention of an operator and electronic communications (e-mail, telefax, SMS, MMS or other) for carrying out promotional or market research activities directed to us.

date and signature of legal representative _____