



## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

*pursuant to Articles 13 and 14 of Regulation (EU) No. 2016/679 and the Applicable National Privacy Laws*

### **Information on the Processing of Personal Data Pursuant to Articles 13 and 14 of Regulation (EU) No. 2016/679 and the Applicable National Privacy Laws**

*Pursuant to Regulation (EU) No. 2016/679 (hereinafter, "GDPR Regulation" or "GDPR") and to the applicable national data protection laws (hereinafter, together with GDPR, "Privacy Laws"), Mediobanca – Banca di Credito Finanziario S.p.A., with its registered office in Milan at Piazzetta Enrico Cuccia 1 (hereinafter, the "Bank" or "the Controller"), as Controller, must provide information on the processing of personal data.*

#### **1. Source of the Personal Data**

Personal data held by the Bank is normally collected directly from the data subject, but may also occasionally be collected from third parties (e.g., telephone directories or other public sources such as the register of the Chamber of Commerce, companies' websites, corporate information providers like Cerved). This notice applies to the processing of your personal data including the data that the Bank collects from third parties. When data is collected from third parties, the notice is provided, at the latest, at the time of the first communication. Regardless of the source, personal data is processed in compliance with Privacy Laws as well as with the duties of confidentiality that underlie the Bank's activities.

#### **2. Purposes of Processing**

Personal data is processed in the course of the Bank's ordinary activities, as well as in the course of connected and ancillary activities for the following purposes:

Mediobanca Banca di Credito Finanziario S.p.A.  
Piazzetta Enrico Cuccia 1  
Milano

Partita IVA 10536040966. Codice fiscale e numero di iscrizione al Registro delle Imprese di Milano, Monza, Brianza, Lodi: 00714490158. Iscritta all'Albo delle Banche n. 4753. Appartenente al Gruppo Bancario Monte dei Paschi di Siena iscritto all'Albo dei Gruppi Bancari al n. 1030. Direzione e coordinamento: Banca Monte dei Paschi di Siena S.p.A.. Aderente al Fondo Interbancario di Tutela dei Depositi e al Fondo Nazionale di Garanzia. Iscritta al Registro Unico degli Intermediari assicurativi e riassicurativi.



- I. **purposes strictly connected and necessary to take steps in order to comply with specific data subjects' requests to obtain information prior to the execution of a contract** (e.g., to provide you with information that you request related to products or services). Your provision of your personal data for the purposes described herein is voluntary. However, failure to provide your personal data may prevent the Bank from responding to your requests. The legal basis for this data processing is the need to take steps at the request of the data subject prior to entering into a contract;
- II. **for direct marketing purposes related to the promotion and sale of the Bank's products and services** as well as related to market research activities, sending invitations or gifts, and public relation activities. Marketing communications will be performed via non-automated means. Additionally, if you have provided your email address in the course of a purchase of a Bank's product or service, marketing communications will be sent via email in order to promote Bank's products or services similar to those you have previously purchased. Your provision of your personal data for the purpose described herein is voluntary. Failure to provide your personal data may prevent the Bank from sending you marketing communications relating to the promotion and sale of Bank's products and services. You may object at any time to this data processing activity by contacting the Controller in writing at: [privacy@mediobanca.com](mailto:privacy@mediobanca.com). The legal basis for this data processing is the Bank's legitimate interest (as a result of a balancing test with the data subjects' rights) in performing marketing activities to develop its business and pursue its corporate purpose, taking into account what your expectations reasonably would be at the time and in the context of the collection of your personal data. You may request information on the balancing test performed by the Bank by contacting the Bank in writing at: [privacy@mediobanca.com](mailto:privacy@mediobanca.com);
- III. additionally, the Bank may process your personal data that was collected for the purposes described above, **for purposes related to complying with its obligations, as required by laws, regulations, EU law and decisions of**



**competent supervisory or monitoring Authorities and bodies.** The legal basis for this data processing is compliance with the legal obligations to which the Bank is subject.

### **3. Means of the Data Protection**

Your personal data will be processed in compliance with Privacy Laws, via paper, IT and electronic means, by applying logics that are strictly connected to the purposes described above and, in any event, through means suitable to ensure the security and the confidentiality of personal data in compliance with Privacy Laws.

### **4. Communication and Dissemination of the Personal Data**

For the purposes described in Section 2, your personal data will be processed by employees of the Bank acting as persons in charge of, and authorized to, process personal data.

- a) other companies within the Group;
- b) providers tasked with enveloping, shipping and storing documentation regarding customer relationships;
- c) other providers used by the Bank in various capacities for the supply of requested products or services;
- d) providers of services for the management of the Bank's IT system;
- e) providers of tax, legal and litigation advice;
- f) providers of auditing services and financial statements certification;
- g) supervisory or monitoring Authorities and bodies, as well as any other public or private body carrying out tasks in the public interest;
- h) marketing and market research companies.

A full and updated list of the Bank's data processors is available at [www.mediobanca.com](http://www.mediobanca.com) - section "Privacy". Your personal data will be transferred outside the EU only on the basis of an European Commission's adequacy decision or of adequate safeguards under Privacy Laws (such as binding corporate rules and standard data protection clauses). Personal data



processed by the Bank will not be disseminated.

## **5. Categories of Personal Data Processed**

For the purposes described above, the Bank processes your personal data such as, by way of example, identity and contact information (e.g., name, surname, address, telephone number, email address, tax code).

## **6. Data retention**

In accordance with the principles of proportionality and necessity, your personal data will be stored in a form that permits identification of the data subject for no longer than is necessary for the purposes for which the personal data is processed, i.e., taking into account:

- The need to continue to retain personal data for the purpose of offering the services agreed to by the user, or for protecting the legitimate interests of the Controller, as described in the abovementioned purposes, in accordance with assessments carried out by Mediobanca;
- the existence of specific legal obligations (provided for by the Italian Civil Code, anti-money laundering legislation, investment services legislation, tax monitoring law, etc.) or contractual obligations that require data processing and retention for specific periods of time.

Mediobanca adopts reasonable measures to ensure that incorrect personal data is rectified or erased.

## **7. Right of the Data Subject**

The data subjects whose personal data are processed have the right, at any time, to obtain confirmation of the existence of their personal data, to be informed of its content and source, to verify its accuracy, to request its integration or update, or to request its rectification (Articles 15 and 16 of GDPR). In addition, data subjects have the right to request the erasure of their personal data, the right to restrict the processing of such personal data, the right to withdraw their consent to data processing, the right to data portability, the right to lodge a complaint before the relevant supervisory authority and the right to



object, at any time, on legitimate grounds to such processing (Articles 17 et. seq. of the GDPR). Such rights can be exercised by sending a written communication to: [privacy@mediobanca.com](mailto:privacy@mediobanca.com). The Controller, including through its designated departments, will handle your request and provide you, without undue delay, with information on the actions taken regarding your request.

## **8. Titolare del trattamento e Data Protection Officer**

The Controller is Mediobanca – Banca di Credito Finanziario S.p.A. with its registered office in Milan at Piazzetta Enrico Cuccia 1. The Bank has appointed a Data Protection Officer.

You can contact the Data Protection Officer by sending an e-mail to the following addresses:

- [DPO.mediobanca@mediobanca.com](mailto:DPO.mediobanca@mediobanca.com)
- [dpomediobanca@pec.mediobanca.com](mailto:dpomediobanca@pec.mediobanca.com)