

## PERSONAL DATA PROCESSING DISCLOSURE

Personal data protection is important for BNP Paribas Group, which has adopted a series of strong principles valid throughout the Group and set forth in the Group Data Protection Policy, available in the Data Protection section of the website [www.BNL.it](http://www.BNL.it).

This disclosure, pursuant to national regulations and the General Data Protection Regulation 679/2016, provides for detailed information on the protection of your personal data, as processed by BNL (hereinafter we/us).

In our capacity as Data Controller, we are responsible for collecting and processing your personal data with reference to the request for the establishment of a contractual relationship with the company of which you are the legal representative (and on whose behalf you have submitted the request) or the subject authorised to operate or for which you hold a significant role or to which you are connected.

The purpose of this document is, specifically, to inform you regarding which of your data we process, the purposes for which we process and share said data and how long we keep them for, as well as your rights and how to exercise them.

Further information may be provided to you where necessary if and when you request a specific product or service.

### 1. WHICH PERSONAL DATA ARE PROCESSED

The Bank will collect and process your personal data directly and/or indirectly obtained through entities previously authorized by you or from public sources.

Data are processed using manual, IT and/or otherwise automated tools, according to reasons strictly linked to the said purposes and, in all cases, in such a way as to guarantee the **security** and **confidentiality** thereof. In addition, your personal data will always be processed in full compliance with the principle of proportionality of processing, based on which all the personal data and the various ways in which they are processed must be pertinent and not excessive for the purposes pursued.

Specifically, we shall collect and process the following categories of personal data referring to you:

- **identification and personal data** (e.g. name, last name, identification document, nationality, place and date of birth, gender);
- **contact details** (e.g. e-mail and address);
- **tax details**: tax Identification or VAT number;
- **education and work information** (e.g. level of education, employment, employer's name, remuneration);
- **criminal records**.

The data we use regarding you may be obtained from the following sources in order to verify or supplement our database:

- Lists/databases disclosed to the public by official authorities (e.g. Official Gazette);
- third parties such as credit agencies, fraud prevention agencies or data brokers, in compliance with the laws governing data protection;
- databases disclosed to the public by third parties.

*Providing and processing the requested data is necessary in order for the Bank to follow up on the company's request to establish or manage a relationship. Failure to obtain the data will prevent the Bank from accepting the company's request.*

### 2. WHY AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

*Such data will be processed for purposes closely connected with and instrumental to managing the request to establish or perform a contractual relationship with the bank, in order to comply with the "know your customer" principle, which the Bank adopts in order to prevent and combat money laundering and terrorist financing. Specifically, we process your data in order to:*

**a) Comply with the Authorities' law obligations, regulations and orders**

We shall process your personal data in order to comply with several legal and regulatory obligations in order to:

- fulfil banking and financial regulations, specifically to:
  - establish security measures in order to prevent fraud and abuses;
  - detect transactions that differ from normal models;
  - monitor and report any risks the company may be subject to;
- reply to an official request by a public or judicial authority in the cases provided for by the law;
- prevent money laundering and terrorism financing;
- comply with current regulations governing sanctions and embargoes;
- combat tax frauds and comply with tax inspection and notification obligations.

**b) Carry out pre-contractual measures or to execute a contract to which the company - of which you are the legal representative or the subject authorised to operate or within which you hold a significant role or to which you are connected – is a party**

We process your data in order to enter into and execute our contracts, specifically in order to:

- provide information on our products and services;
- recover any credits and, more in general, settle any disputes that may arise between us;
- assist you and reply to your requests;
- assess whether we can provide you with a product or a service and at which conditions;

**c) Satisfy a legitimate interest of BNL**

We process your data in order to implement and develop our products and services, to improve our risk management and to defend our rights, including:

- proof of the transactions conducted by the interested party;
- fraud prevention;
- IT management, including management of infrastructures (e.g. shared platforms) and business continuity and IT security;
- the drawing up of individual statistical models, based on the analysis of transactions, for example to help define your credit risk score;
- the establishment of aggregate statistics, tests and models, in order to manage BNL and Group risk management, to improve existing products and services or create new ones;
- for Group control purposes, sharing with BNL Group and BNP Paribas Group companies, also in countries outside the EU, personal data of relevance for preventing money laundering and terrorism financing and to comply with the provisions in force regarding sanctions and embargoes, in order to combat tax fraud and comply with tax verification and notification obligations.

### **3. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

In order to comply with the above-mentioned purposes, your personal data shall be disclosed exclusively to:

- companies belonging to the BNPP Paribas Group (e.g. to benefit of all the range of the Group's products and services);
- independent agents, intermediaries or brokers, bank and commercial partners with whom we maintain a regular relationship;
- financial or judicial authorities, public agencies or entities as required and where permitted by law;
- professionals (e.g. lawyers, notaries, auditors, advisors);
- management companies of national and international systems to control fraud against banks and financial intermediaries;
- credit card circuits (Visa, Mastercard, SIA - SSB, Cirrus, Maestro);
- companies who work with us to provide payment services (e.g. SWIFT, Eurocheque).

#### **4. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA**

If, in compliance with the foregoing and for the purposes indicated herein, it should be necessary to transfer your personal data abroad (outside of the EU), BNL will proceed to do so, provided that the European Commission has deemed the destination country suitable for transfer pursuant to art. 45 of Regulation no. 2016/679 (adequacy decision) or, in the absence of such a decision, if one of the conditions set forth in articles 46 and 47 of said Regulation apply (specifically, standard contractual clauses or binding corporate rules). For further information in this regard, you may contact us as indicated in paragraph 8.

#### **5. HOW LONG WILL WE STORE YOUR PERSONAL DATA?**

Unless any specific storage requirements are imposed by law, we will retain your personal data for the entire duration of the contract, and for a further period of 10 years and six months, or 15 years and six months from the termination of the contractual relationship (in consideration of terms for the limitation of rights in relation to which we may need to defend ourselves, or storage requirements imposed by regulations), in the case of data necessary to execute contracts in existence between us or to carry out transactions ordered/requested by you or to satisfy a legitimate interest on our part.

Data instrumental to the establishment of a contractual relationship that is not subsequently completed will be stored for a maximum of 12 months, in order to allow us to respond to your specific requests.

#### **6. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

In compliance with the regulations in force, with regard to our processing of your personal data, you are entitled, at any time, to access the data regarding you, by sending an e-mail to [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com); [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com) or by entering the Data Protection section of BNL.it and completing the dedicated form provided. You may likewise request the rectification, deletion and restriction of your data, object to the use thereof for legitimate reasons and withdraw any consent given (from arts. 15a to 22 of the General Data Protection Regulation 679/2016).

In addition to the rights set forth above, based on the applicable regulations, you also have the right to submit a claim to the Data Protection Authority.

#### **7. HOW TO KEEP UP TO DATE ON THE CHANGES TO THIS DATA PROTECTION DISCLOSURE**

*This Disclosure is subject to updates/additions in the course of the relationship with the Bank. Extensive information on such updates will be given through the means available to the Bank (text messages, message in the private area, mailing, publication on the Bank's website).*

*For the avoidance of doubt, where the changes in question concern processing purposes that require your consent, the Bank will make sure that such consent has been obtained.*



## 8. HOW TO CONTACT US

BNL S.p.A., with offices on Rome, Viale Altiero Spinelli, 30, Website: [www.BNL.it](http://www.BNL.it), e-mail address to exercise your rights: [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com); [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com). Pursuant to Art. 38 of the GDPR, we are pleased to provide you with the contact data of our Data Protection Officer (DPO), Mario Mosca: [dataprotectionofficer@BNLmail.com](mailto:dataprotectionofficer@BNLmail.com).