NOTICE (CUSTOMERS)

pursuant to Articles 13 and 14 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016

Notice last updated: 18 March 2020

Dear Customer,
Before processing your data, we present this notice prepared by Banco BPM (hereinafter simply the "Bank"), required for the protection of your personal data, according to the provisions of applicable legislation, and specifically, 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").
The information below will be useful to help you understand:

- which parties process your data and how to contact them;
- how your data is analysed and for what purposes;
- the rights available to you.

USEFUL CONTACTS

Banca Akros is the Company that processes your data and for the purposes of the Regulation, it is considered to be the Data Controller. In this role, it is responsible for guaranteeing application of the organisational and technical measures necessary and appropriate for protection of your data. The registered office of the Bank is in Milan, Italy, at Viale Eginardo no. 29, 20149.
Furthermore, the Bank has appointed a Data Protection Officer (hereinafter also DPO), responsible for guaranteeing observance of the regulations for protection of your privacy, who may be contacted regarding issues concerning the processing of your data at the following addresses: Piazza F. Meda no. 4, Milan - 20121, Italy, protezionedati@bancaakros.it.
Banca Akros uses specifically designated Data Processors, Joint Controllers, and Data Controllers, a list of which is available upon request to be sent to the same addresses. Further information regarding your rights can be accessed in the dedicated area "Your Rights".

INFORMATION REGARDING PROCESSING

You are informed that all personal data that you provide us with or that is communicated to us by third parties will be processed in compliance with applicable legislation on privacy and data protection, observing principles of fairness, lawfulness and transparency, in line with the purposes indicated below. Data will be collected to the exact extent necessary for processing, and using it only via personnel authorised for the purpose and trained in order to guarantee the necessary confidentiality of information provided.

Specifically, the Bank may use your data:

1) To allow for the proper management of the relationship in the pre-contractual and contractual phase, including the execution of all related activities (by way of example but not limited to: credit and financial services, management of personal assets and real estate, credit recovery, management of insurance activities and related activities, surveying the quality of the services provided).

The processing of your personal data for these purposes is necessary and does not require your consent. Refusal to provide data will make it impossible for the Bank to establish and implement the aforesaid services.

2) To fulfil legal obligations in relation to statutory, criminal, fiscal, community law and regulatory matters, in addition to standards, codes and procedures approved by Authorities and other competent Institutions (e.g. tax and contribution assessments, anti-money-laundering initiatives).

3) To exercise or defend a right in the context of judicial proceedings, as well as administrative proceedings or arbitration and conciliation, in the cases defined by law, European legislation and regulations.

Processing of the aforementioned data is necessary in order to fulfil one of the Data Controller's legal obligations and therefore your consent is not required.

In performance of the activities described, the Bank may also process special categories of personal data for which explicit consent is required (such as in the case of management of claims on behalf of insurance companies), without prejudice to the specific cases provided by the Regulation that involve processing even in the absence of consent.

Moreover, subject only to your freely given, specific, informed and unambiguous consent, may the Bank use your data through prevalently automated methods (following channels: e-mail, telephone, internet, app or other communication systems) and also on paper for:

1) processing studies and market research;

2) commercial and advertising information activities relating to the sale of products and services (of Banco BPM Group and third party companies) also identified through the processing of information that enables preferences, habits and consumer choices to be analysed (so-called customer profiling). This information may be acquired internally (by analysing current account transactions and financial situation in general, including navigation in the personal area of the Bank's website), or from external sources (so-called enrichment of the Bank's database); processing set of information allows the Bank to divide customers into categories that are homogeneous in terms of behaviour or specific characteristics, in order to be able to offer products and services that are consistent with their needs.

Processing of the aforementioned data is not compulsory for the execution of the contract, therefore your consent is required, without which you will not be able to receive "dedicated" commercial communications.

It may also be necessary for the Bank to process your data in order to pursue its own legitimate interest, subject to its being commensurate with your reasonable expectations and provided that your interests and fundamental freedoms are not prejudiced; the Bank's legitimate interest includes the processing of data for the performance of activities functional to the implementation of any transactions, including intra-group transactions, including, by way of example, securitisation, credit assignments and the issuance of securities, transfers of companies and business units, mergers and demergers, as well as for the implementation of commercial collaboration, including intra-group collaboration, in order to improve the integrated use of the technical solutions offered to support commercial processes.

Period for storage of your data

The Bank will store your data for the period of time strictly necessary for the purposes for which the data was collected, observing the terms defined or other time frames where established by legislation and regulations of reference or required for judicial reasons or justified by the public interest.

Transfer of and access to your data

The Bank, without it being required to request your consent, may communicate your personal data to various categories of recipients, including:

- Companies of the Banco BPM Group (e.g. Banco BPM, ProFamily, Banca Aletti etc.) for the performance of administrative and service-related activities.

- Parties operating inside and outside of the European Union (e.g. credit institutes, consultants, professional studios, companies which provide IT systems and services, companies which provide services related to market research and marketing, insurance companies, debt-collection companies, consumer credit companies, leasing companies, etc.) that may process your data in the role of autonomous data controllers, external data processors or co-data controllers.

Your data shall primarily be processed within the European Union. The Bank reserves the right to transfer your personal data to non-EU countries to meet possible requirements of a technical and organisational nature. In any case, processing of your data will occur observing the appropriate guarantees defined by applicable legislation such as the adequacy decisions of the European Commission, standard contractual clauses approved by the European Commission or other legal tools.

- Judicial authorities, the Italian Revenue Agency, pensions organisations, administrative and sector authorities, public information systems such as the central office for payment fraud prevention (known by the Italian abbreviation "UCAMP") and the public administrative prevention system for fraud in the consumer credit sector, in particular for identity theft (known by the Italian abbreviation "SCIPAFI"), as well as parties to which communication of the data is a legal obligation.

The parties listed will process the data in their role as autonomous data controllers.

YOUR RIGHTS

In relation to the data processed, the Bank guarantees you the possibility to:

- receive confirmation of the existence or otherwise of personal data regarding you and copies thereof in an intelligible form;
- obtain updating, amendment or supplementing of your data;
- request deletion of your data, within the limits defined by legislation;
- oppose, entirely or in part, the processing of personnel data that regards you;
- limit processing, in the case of a breach, request for correction or opposition;
- request portability of data processed electronically, provided on the basis of consent or a contract;
- revoke consent to processing of your data, where applicable;
- in relation to entirely automatic profiling, obtain human intervention by the Data Controller to express your opinion or contest the decision.

Finally, where considered appropriate, you may present a complaint to the Data Protection Authority, which acts via the methods and forms defined by law; for further information you may consult the Authority's website www.garanteprivacy.it
For this purpose, the Bank has provided a specific section on its website (Privacy area), to allow you to submit requests free of charge. Here, you can download the form and send it, once filled in, to the following email address: protezionedati@bancaakros.it, or via recorded postal delivery to the registered office of the Parent Company Banco BPM: Piazza F. Meda n. 4, 20121 Milan, Italy, for the attention of the Data Protection Officer.
You are informed that the Bank undertakes to reply to your requests within one month, except in particularly complex cases, where a maximum period of 3 months may be required. In any case, the Bank shall explain the reason for the delay to you within one month of your request.
The outcome of your request will be provided in writing or in electronic form. In the case that you have requested correction, deletion or limitation of processing, the Bank undertakes to communicate the outcome of your request to each of the recipients of your data, except in the case that this is impossible or implies a disproportionate effort.
Please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

The Bank specifies that it may refuse your request if it is unfounded or excessive, particularly where of a repetitive nature. The Bank maintains a register to track your requests for this purpose.