



BANCA UBAE S.p.A. PRIVACY POLICY REGARDING THE WEB SITE

Below is a description of methods used to manage BANCA UBAE S.p.A. web site with reference to processing personal data of users consulting them.

This notification is also made in accordance with Art. 13 of Legislative Decree 196 dated June 30 2003 – Code concerning the protection of personal data of those interacting with BANCA UBAE S.p.A. web services that can be accessed through the Internet starting from the following address:

<http://www.bancaubae.it>

corresponding to the home page of BANCA UBAE official site.

This notice only covers BANCA UBAE web site and not other web sites that users can consult by means of links.

This notice is also prompted by Recommendation No. 2/2001 adopted on May 17 2001 by European authorities for the protection of personal data meeting as a Group instituted by Art. 29 of EU Directive 95/46/CE in order to establish certain minimum requirements for gathering personal data on-line and, especially, the methods, timing and nature of information that data controllers must provide to users when they access web pages, without regard to the purpose of such accesses.

THE 'DATA CONTROLLER'

Data relevant to identified or identifiable persons may be processed as a result of consulting this site. Art. 13 of Legislative Decree 196/2003 stipulates that those from whom personal data is collected must receive advance information regarding the use of such data.

The 'Data Controller' of the processing is BANCA UBAE S.p.A., with registered offices and headquarters in Via Quintino Sella, 2 - 00187 Rome (Italy).

DATA COLLECTION

Personal data is collected within specific sections of the web site by means of electronic forms. Navigating or consulting the web site does not imply processing the data the law defines as **sensitive**.¹

PLACE OF DATA PROCESSING

Processing relevant to web services on this site takes place at the Bank's above mentioned headquarters and is performed by internal staff or any person charged with occasional maintenance operations.

¹ Reference is made here to personal data apt to discern an individual's racial and ethnic origin, his religious, philosophical and other beliefs, political opinions, membership of political parties, trade unions, associations or organizations of a religious, philosophical, political or trade union-related nature, his health and sexual life.



TYPES OF DATA PROCESSED

Navigation Data

IT systems and software procedures used to operate this site acquire certain personal data as part of normal operations, the transmission of which is implicit for use of Internet communication protocols.

This information is not gathered in order to be associated with identified parties, however, by its very nature it could enable identification of a user by means of processing and associations with data held by third parties – for instance, an ISP (Internet Service Provider).

This category of data includes IP addresses or domain names of computers used by a user who accesses the site, addresses in URI (Uniform Resource Identifier) notation of resources requested, the time of requests, the method used to present the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (accepted, error, etc.) and other parameters concerning the operating system and user IT environment.

This data is only used to obtain anonymous statistics on use of the site and to check that it functions properly. The data in question could be used by competent authorities to determine responsibility in the event of computer crimes to the detriment of the web site.

Data provided voluntarily by a user

The optional, explicit and voluntary sending of an e-mail to addresses indicated in this site will subsequently lead to the acquisition of the sender's address, required in order to respond to requests, in addition to further personal data given as part of the message.

Specific summary information will progressively be reported or shown in pages of the site prepared for special services available on request.

COOKIES

No user personal data is purposely acquired by the site.

Cookies are not used to transmit information of a personal nature nor are any type of so-called permanent cookies used, that is to say, user tracking systems.

Use of so-called session cookies (which are not stored permanently on a user's computer and disappear when the browser is closed) is strictly limited to transmission of session identifiers (comprising random numbers generated by the server) required to enable secure, efficient navigation within the site.

The so-called session cookies used in this site avoid use of other software techniques that can potentially prejudice the user's privacy when navigating and do not allow acquisition of a user's personal identification data.



DATA PROVIDED OPTIONALLY

Apart from what has been said concerning navigation data, users are free to provide personal data indicated in specific electronic request forms or in contacts with the bank to request the forwarding of informative material or other correspondence.

Failure to provide such data may mean it is impossible to obtain whatever has been requested.

PROCESSING METHODS

Personal data provided by users is only used to perform the service itself or service requested and is not disclosed to third parties, except in cases where it is mandatory by law or strictly necessary in order to fulfil the user's request.

Personal data is processed by automated or other means for the time strictly necessary to achieve the purpose for which the data itself was gathered.

No data deriving from the web service will be disseminated.

Specific security measures are observed to prevent loss of data, illicit or incorrect uses and unauthorized accesses.

RIGHTS OF PARTIES CONCERNED

Parties to whom personal data refers have the right at any time to obtain confirmation of the existence or otherwise of the data itself and to be informed of its content and source, check its correctness or request that it be supplemented, updated or rectified (Art. 7 of Legislative Decree 196/2003).

In accordance with the above mentioned article a party may request that data be cancelled, transformed into an anonymous form or that data processed in violation of the law be blocked and, in any event, for legitimate reasons oppose its processing. You can access the full text for requesting the exercise of rights concerning personal data and other rights stipulated by Articles 7-10 of the Decree from <http://www.bancaubae.it/ubae/privacy.asp>

Requests should be sent in writing to BANCA UBAE S.p.A. Via Quintino Sella,2 – 00187 Rome, including by fax to +39 06/42046404 or e-mail to privacy@ubae.it

We inform you that our site may contain links to other web sites that are not managed or controlled by the Bank. The privacy policy indicated above applies exclusively to this Internet site. The Bank cannot be held responsible for the content of third-party sites and measures adopted by them to protect personal data.

Users are therefore asked to exercise due care and check and, if necessary, confirm acceptance of relevant policies for safeguarding privacy.



CHANGES TO THIS PRIVACY POLICY

In future this document may be subject to changes if, for instance, the Bank were to add or eliminate options or features of its services or products, or in order to conform with the latest legal, technological, etc. requirements. Therefore, we recommend that you check this document from time to time to see if any changes have been made.

The current version of this document is 4.0 dated October 1 2011.

BANCA UBAE S.p.A.