



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

### **THE REASON FOR THIS POLICY**

This policy describes how the website is managed in relation to processing the personal data of those who use it. This notice is provided pursuant to article 13 of (UE) Regulation no. 2016/679 and the and the Guarantor supervisory body's general provision of 8 May 2014 on the subject of cookies, to those who interact with the web services provided digitally by Banca UBAE SpA via the website address:

<http://www.bancaubae.it/>

corresponding to the homepage of the Bank's official website. This notice applies only to the above website, not to other websites that users may consult via external links.

### **DATA CONTROLLER AND DATA PROTECTION OFFICER**

When people visit this website, their personal data may be processed as identified or identifiable persons. According to the abovementioned article 13, the people involved must be informed in advance about the use of data concerning them.

The data controller is Banca UBAE S.p.A. with registered office and head office in Via Quintino Sella 2, 00187 Rome.

The aforesaid Data Protection Officer can be contacted at the abovementioned address or by sending an email to the following address: [dpo@ubae.it](mailto:dpo@ubae.it).

### **COLLECTING DATA**

The collection of personal data takes place by filling out digital forms and sending emails to the Bank's addresses published on the website.

### **PLACE OF DATA PROCESSING**

Data processing related to web services provided by this site take place at the Bank's offices and are carried out by in-house staff of the External Relations and Institutional Development Department, appointed as data controllers, as well as by technical personnel of the company Arcipelago Software Srl (technological maintenance of the site) and the company ADSGLEN Srl (website content management).

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## **TYPES OF DATA PROCESSED**

### **Navigation data**

During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the communication protocols of the Internet.

Such information is not collected to be associated with identified users, but by its very nature could be used to identify users through processing and association with data held by third parties.

This category of data includes IP addresses or domain names of computers used by visitors connecting to the site, URI (Uniform Resource Identifier) of requested resources, time of request, the method used to submit the request to the server, the file size obtained in response, the numerical code indicating the status of response from the server (successful, error, etc) and other parameters regarding the operating system and the user's computer.

This information is used only to obtain anonymous statistical data about the website and to check its correct functioning. Moreover, the data may be used to ascertain responsibility in the event of computer crimes against the website.

### **Data supplied voluntarily by the user/visitor**

The optional and explicit submission of emails to the Bank's addresses listed on this website (e.g. "About us" section) involves the acquisition of the sender's address, required for responding to requests, and any other personal data included in the message.

It is also possible to fill in digital forms (e.g. "Working with us" section) and a specific form is provided in the section.

## **COOKIES**

### **What are cookies?**

Cookies are small text strings that the websites visited by the user send to the pc (usually the browser) where they are stored before being re-transmitted to the same site on the user's next visit. During website navigation, the user's terminal may also receive cookies that are sent by different web sites or servers (known as "third party" cookies) which may contain some of the data (such as images, maps, sounds, specific links to pages in other domains) from the website the user is visiting.

The user's browser normally holds large numbers of cookies, sometimes with long-lasting persistence over time, used for various purposes: execution of digital authentication, monitoring sessions, storing information about specific configurations of users who access the server, etc.

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Cookies can also be subdivided according to their duration into session cookies (i.e. temporary ones automatically deleted from the terminal at the end of the session by closing the browser) and persistent cookies (i.e. those that are stored on the visitor's terminal or hard drive until their expiry or cancellation by the user).

The use of the so called "technical cookies" is strictly limited to transmitting of identifiers of session (consisting of random numbers generated by the server) required for the safe and efficient operation of the website. The data stored in cookies remain anonymous since the cookie identification number is not associated with the personal information provided by users; for these cookies, the user's consent is **not** required, because without them some of the abovementioned operations may not be allowed or would be more complex and/or less secure.

Otherwise, if the cookies are used for additional purposes, typically for behavioural analysis and sending personalised advertising material ("profiling cookies") or just to obtain, by means of services rendered by third parties, information on the aggregate number of users and how they visit the site ("analytical cookies"); for these cookies, the user's consent is required. Before sending these cookies to the PC, in accordance with current regulations (general measures issued by the Guarantor supervisory body on 8 May 2014), at the time when the user accesses the homepage or other pages of the site, a banner immediately appears in the foreground with brief information on the use of cookies and requesting the consent; users can give their consent and by continuing the navigation, accessing any element in the present website, by clicking "OK" in the banner.

For the purposes of this note, the information regarding cookies is also valid for similar instruments that allow the identification of the user or the PC (e.g. "web beacons", "web bugs", "clear gifs", etc).

The following cookies of various types are used by the Bank:

1. "Technical cookies" (navigation or session cookies; functional cookies)

1.1. Navigation/session cookies. These are basic cookies for navigating the website using all its functions such as keeping the session actively online and providing access to the reserved areas. They are strictly necessary since, without them, it would not be possible to provide the services requested. These cookies do not collect information to be used for commercial purposes.

1.2. Functional cookies. These cookies enable the user to navigate according to a series of selected criteria (e.g. the chosen language) in order to provide a better navigation experience. The information collected by this type of cookie is anonymous in form.

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UBAE uses a specific cookie for this purpose.

The activation of these technical cookies does **not** require the user's consent.

This website does **not** use, and has not installed, its own cookies and/or "third party cookies" for behavioural analysis and sending advertising messages ("profiling cookies"); furthermore, information is not collected regarding the user's navigation for commercial, advertising or retargeting purposes.

The Bank also uses so called performance/presentation cookies, including the persistent type, via third parties (Google Analytics) used exclusively for statistical purposes; the cookies in question collect information in aggregated form in order to monitor and analyse accesses to the site.

For the installation and handling of cookies that do not fall under the definition of "technical cookies", including the statistical cookies installed and managed by "third parties" (Google), the user's consent is required; if consent is not received, such cookies will not be installed.

Therefore, we kindly ask you to express your will by filling the field in the banner in the Home Page of the website. We also would like to inform you that the banner will stay active until your choice is not stated, the navigation, anyway, will not be banned, as well as the fruition of the contents.

Your authorisation to install analytical cookies (Google Analytics) will also include authorisation to install the technical cookie (DisplayCookieConsent) used to process the presence or absence of the user's permission.

#### How to give or revoke the consent

The consent to the utilization of cookie analytics is initially given by filling the field provided within the short information/initial banner and by clicking then on the button *Continue*, as represented herebelow:

Accept the website cookies

The consent can be revoked at any time by modifying the security setting of your browser according to the instructions shown in this information note.

The instrument Google Analytics collects the IP address of visitors to the site in order to obtain an indication of their geographic location. This method is known as IP geo-localisation. Google Analytics does not report information about the actual IP addresses of visitors. By using a method known as "masking IP", Google Analytics communicates information in such a way that only a part of the IP address is used for geo-localisation, instead of the full address.

To safeguard privacy, the Bank applies the "masking IP" option which obscures some elements of the user's IP address rendering it anonymous.

To see how the cookies in Google Analytics operate, visit the following link to the official documentation supplied by Google:

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<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

You can download the browser's additional component in order to deactivate Google Analytics. The additional component communicates with the JavaScript code of Google Analytics (ga.js) stating that information about site visitors should not be sent to Google Analytics.

The storage of Google Analytics on the user's terminal and/or hard disk can be disabled through the following link:

<https://tools.google.com/dlpage/gaoptout>

The table below summarises the cookies used by the Bank:

Name	Source	Duration	Purpose	Domain
<b>_icl_current_language</b>	Banca UBAE	1 day	Used to store the user's chosen language during navigation	<a href="http://bancaubae.it">bancaubae.it</a>
<b>DisplayCookieConsent</b>	Banca UBAE	1 year	Keeps track of the user's consent or otherwise regarding cookies, in other words the installation of "Google Analytics" cookies	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_utma</b>	Google Analytics	2 years	Used to establish the number of visits by a user to the Banca UBAE website	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_utmt</b>	Google Analytics	10 minutes	Used to manage the flow of requests	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_utmb</b>	Google Analytics	30 minutes	Cookie used to establish the duration of the website visit	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_utmz</b>	Google Analytics	6 months	Used to establish the geographic location of the Internet user	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_ga</b>	Google Analytics	2 years	Utilised to distinguish users	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_gat</b>	Google Analytics	10 minutes	Utilised to handle the flow of requests	<a href="http://bancaubae.it">bancaubae.it</a>
<b>_umtc</b>	Google Analytics	Navigation session	Cookie used to establish the duration of the website visit	<a href="http://bancaubae.it">bancaubae.it</a>

Each user can set their browser to receive a warning of the presence of a cookie and decide whether to accept or reject it. It is also possible to refuse cookies by turning them off in the browser. Since the total or partial disabling of cookies may affect the functionality of the website, it is

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important to note that the security settings of the browser can be changed at any time through the following links:

- **chrome:** <https://support.google.com/chrome/answer/95647?hl=it>
- **Firefox:** <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- **Internet Explorer:** <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>
- **Opera:** <http://help.opera.com/Windows/10.00/it/cookies.html>
- **Safari:** <http://support.apple.com/kb/HT1677?viewlocale=itIT>

Or you can visit the website <http://www.aboutcookies.org>

The Bank's website has a link to the profile of Banca UBAE S.p.A. on social media LinkedIn. The responsibility for managing cookies and privacy aspects can be viewed at the following link:

<https://www.linkedin.com/legal/cookie-policy?trk=hbftcookie>

of the LinkedIn social media website.

A list of some providers who work with website managers to collect and use information on behavioural advertising is available at:

<http://www.youronlinechoices.com/it/le-tue-scelte>

where more information on each provider, as well as blocking or activating individual operators is available.

As already mentioned, our Bank does not collaborate and does not have trade agreements or contracts with third party companies for providing any type of advertising, also using cookies.

## **SUPPLYING PERSONAL AND LEGAL BASIS FOR THEIR PROCESSING**

Apart from the requirements of navigation data, the user is free to provide personal details on the application forms to the Guarantor supervisory body or indicated in contacts with the office to request the sending of newsletters, information material or other communications.

Apart from the requirements of navigation data, the user is free to provide personal details contained in the email request form sent to email addresses shown on the website, as well as the details provided on digital forms.

Failure to provide such data may make it impossible to fulfil the request. The legal basis for the processing is the execution of pre-contractual measures adopted upon request of the involved party.

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## **MANNERS OF PROCESSING**

The personal information provided by visitors is used only to perform the service or function requested and is not disclosed to third parties, except in cases where communication is required by law or is strictly necessary for the fulfilment of the user's requests. Personal details are processed by automated and standard tools, for the time required to achieve the purpose for which they were collected and, anyway, cancelled after one year from their receipt.

No information from the web service is disclosed.

Specific security measures are applied to prevent data loss, misuse or improper and unauthorised access.

For the purposes of this info note, the Bank takes no decisions based on automatic processing only.

## **USERS' RIGHTS**

People who provide personal details are entitled at any time to obtain confirmation of their existence or otherwise and to know the content and origin, checking the accuracy or requesting additions and updating, or their amendment.

Furthermore, according to the same article, people are entitled to request the cancellation of personal details, the limitation of the processing, the revocation of the content, the portability of data, as well as to state a claim to the control authority and to oppose, in any case, for legitimate reasons to the processing. Users' rights can be claimed for the cases stated in the paragraph "DATA CONTROLLER AND DATA PROTECTION OFFICER".

We should remind you that the Bank's website may contain links to other websites which are not managed or controlled by the Bank. This privacy policy applies only to the Bank's Internet website. The Bank is not responsible for the contents of third party websites and the measures for protecting data used by them. Visitors are therefore advised to pay particular attention, checking and accepting, if appropriate, the relative policies for safeguarding privacy.

## **AMENDMENTS TO THIS PRIVACY POLICY**

This document may be subject to changes in the future whenever the Bank decides to add or eliminate options or features of its services or products, or to comply with the latest developments (juridical, technological, etc). Hence, it is advisable to consult this document periodically.

The current version of the document is dated 25 May 2018, version 7.4

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