



PRIVACY POLICY REGARDING THE MANAGEMENT OF COOKIES

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 abovementioned website, not to other websites that users may consult via external links.

DATA CONTROLLER AND DATA PROTECTION OFFICER

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

Our Bank appointed the Data Protection Officer who can be contacted at the abovementioned address or by sending an email to the following address: dpo@ubae.it |

PLACE OF DATA PROCESSING

Processing related to web services of this site take place at the Bank's Head office.

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.

These data are used only to obtain anonymous statistical data about the website and to check its correct functioning. The data may be used to ascertain responsibility in the event of computer crimes against the website or the applications accessible through the site.

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. "Network" section) implies 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 these sections.

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.

Cookies, which are usually in the browsers of users in very large numbers and sometimes with characteristics of wide temporal persistence, are used for different purposes, such as: execution of computer authentication, session tracking and storage of information on specific configurations regarding users accessing the server.

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 their use, the user's consent is **not** necessary, because without them some of the abovementioned operations may not be allowed or would be more complex and/or less secure.

Otherwise, if cookies are used for other purposes, typically for behaviour analysis and sending personalized promotional-advertising messages (so-called "profiling" cookies) or even just to obtain, through services provided by third parties, information in aggregate form on the number of users and how they visit the site (so-called "analytics cookies"), the user's consent is required.

For the purposes of this notice, the information contained in cookies is also valid for similar tools that allow the identification of the user or the PC (e.g. web beacons, web bugs, clear gifs ...).

Herebelow, please find the different types of cookies 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.

UBAE uses a specific cookie for this purpose.

The consent of the data subject is **not** necessary for the use of the above mentioned technical cookies.

This site does **not** use/install its own cookies and/or those of the so-called "third parties" used for the purpose of analysing behaviour and sending promotional-advertising messages (so-called "profiling" cookies), nor does it collect information on users' navigation for commercial, promotional or retargeting purposes.

The Bank also uses the so-called performance/presentation cookies, including persistent cookies, through third parties (Google Analytics) for statistical purposes; these cookies collect aggregate information in order to monitor and analyse the 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.

Any authorization to install cookies analytics (Google Analytics) will also include authorization to install the technical cookie (cookiealert) used to manage the consent.

How to give or revoke the consent

The consent to the use of cookie analytics is initially given by confirming the "close" field provided in the banner of the Home Page or "I agree" which appears once you have read the information or by clicking an element in the page underneath the banner.

The consent can be revoked at any time by changing the security settings of your browser by following the instructions below in this information.

The Google Analytics tool collects the IP address of visitors to the website to provide an indication of their geographical location. This method is known as IP geo-location. Google Analytics does not report information about the actual IP addresses of visitors. Due to the use of a method known as IP masking, Google Analytics reports information so that only part of the IP address is used for geo-location instead of the entire address.

In order to protect the confidentiality of users, the Bank applies the "IP masking" option, which obscures certain digits of the browser's IP address by rendering the data anonymous.

For the functioning of cookies in Google Analytics please refer to the following link to the official documentation provided by Google:

https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008

You can download the browser add-on for deactivating Google Analytics. The add-on component reports the Google Analytics JavaScript code (ga.js) to indicate that information about your visit to the website should not be sent to Google Analytics:

https://support.google.com/analytics/answer/181881?hl=en&ref_topic=2919631



In the following table, please find the cookies used by the Bank:

Name	Source	Duration	Purpose	Domain
Ubae-cookie	Banca UBAE	30 days	Cookies to track consent to the cookie policy.	bancaubae.it
_ga	Google Analytics	2 years	Used to distinguish users	bancaubae.it
_gat	Google Analytics	1 minute	Used to manage the flow of requests	bancaubae.it
gid	Google Analytics	24 hours	Used to distinguish users	bancaubae.it

However, each user can set their browser to receive a warning of the presence of a cookie and decide whether to accept or reject it. You can also automatically refuse to receive cookies by activating the appropriate option on your browser.

While pointing out that disabling all or part of cookies could compromise the use of the site's functions, we would like to inform you that you can change the security settings of your browser at any time following this path:

- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=en>
- **Firefox:** <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- **Internet Explorer:** <https://privacy.microsoft.com/en-gb/privacystatement>
-
- **Opera:** <http://help.opera.com/Windows/10.00/it/cookies.html>
- **Safari:** <https://support.apple.com/en-gb/HT201265>

You can also visit: <http://www.aboutcookies.org>

The Bank's website contains a link to the profile of Banca UBAE S.p.A. hosted on the social media LinkedIn. The responsibility for the management of cookies and privacy aspects that can be consulted at the link:

https://www.linkedin.com/legal/cookie-policy?trk=hb_ft_cookie

is of the social media LinkedIn.

We point out the possibility of having a list of some providers who work with website operators to collect and use information useful for the fruition of behavioural advertising by connecting to the link:

<https://www.youronlinechoices.com/uk/your-ad-choices>

where you can get more information about each of them and block or activate every single operator.



SUPPLYING PERSONAL DATA AND LEGAL BASIS FOR THEIR PROCESSING

Apart from that specified for navigation data (see page no. 1), the user is free to provide personal data contained in the request e-mails sent to the e-mail addresses given on the site as well as the data entered in electronic 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 data subject.

WAYS OF PROCESSING AND STORING PERSONAL DATA

The personal data provided by users are used only to perform the service itself or the performance requested and are not communicated to third parties, unless such communication is required by law or is strictly necessary to fulfil the user's requests.

Personal data are processed by automated and non-automated means for the time strictly necessary to achieve the purposes for which they were collected and are deleted in any case after one year from receipt.

No data deriving from the web service are disclosed.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

For the purposes indicated in this disclosure, the Bank does not use decision-making processes based solely on automated processing.

USERS' RIGHTS

The subjects to whom the personal data refer have the right (Articles 15 to 22 EU Reg. No.679/16), at any time, to obtain confirmation that their personal data are being processed, to access such data and to know their content and origin, verify their accuracy or request integration, updating, or correction. Furthermore, data subjects have the right to request deletion, restriction of processing, revocation of consent, portability of data and to lodge a complaint with the supervisory authority and to object in any event, on legitimate grounds, to the processing of the data. The rights of the data subjects can be exercised as per para. "DATA CONTROLLER AND DATA PROTECTION OFFICER", as in page 1 of this note.

We hereby inform you that our website may contain links to other websites that are not operated or controlled by the Bank. This privacy policy applies exclusively to this website. The Bank is not responsible for the content of third-party websites and the data protection measures taken by them.

The users are, therefore, advised to pay particular attention and to check and possibly accept the relevant privacy protection policies.

AMENDMENTS TO THIS PRIVACY POLICY

This notice may be amended in the future when, for example, the Bank adds or deletes options or features to its services or products, or in order to keep up-to-date of the latest legal and technological developments, etc., it is therefore advisable to consult this notice from time to time.

The date of the present note is 10 February 2020