



Privacy Notice

Client

1. Data Controller

The Data Controller is Banca UBAE (hereinafter the “Bank”) having its head office at no. 2 Via Quintino Sella – 00187 Rome, Italy. The Data Protection Officer can be contacted at this address or at the following email address: dpo@ubae.it

2. Data subject to processing

For the purposes set forth in this notice the Bank can process personal identification and contact data as well as economic data (such as those regarding banking operations carried out) and data regarding assets. With the customer’s permission the Bank can also process data concerning his/her preferences and consumer habits and behaviours. These data come either directly from the customer or from third parties, as in the case of transactions whereby are credited or debited as instructed by other subjects or in the case of data acquisition by external firms in order to determine creditworthiness or for the purposes of commercial information.

3. Processing methods

The Bank processes the customer’s personal data in compliance with EU Regulation 2016/679 (hereinafter GDPR¹) and Italian Legislative Decree no. 196/2003 and subsequent amendments and additions thereto both manually (processing of paper documents and deeds) and with automated and logics methods in strict accordance with the purposes. The processing is protected by adequate safeguards. The Bank does not employ automated decisional processes and does not circulate personal data.

4. Purposes and legal grounds for processing

4.1 .Contractual purposes

If the customer wishes to open a current account with the Bank or initiate another type of business relationship or service, a list of which can be found in the “Our business” section of the website www.bancaubae.it, then the Bank needs to process the customer’s personal data. This is necessary in order to acquire preliminary information for the contract, to finalise such a contract and afterwards to manage and monitor the use of the relations and activated services. Art. 6 para. 1 letter b) of the GDPR provides the legal grounds for handling for administrative and accounting purposes linked to pre-contractual and contractual obligations, therein including means of remote communication such as *internet banking* and *customer service* by telephone. The provision of data is mandatory and they shall be stored for the period of time the contract is valid. In the case of contract termination, for whatever reason, or of non-completion the data shall be stored in compliance with the law (ten years). If the position becomes non-performing, then the personal data needed to recover our credit shall be stored until such time as the situation is resolved.

4.2 Legal purposes

The Bank processes the customer’s personal data for the purposes of legal obligations (such as checks relating to the prevention of money laundering and fraud, mandatory communications for tax reasons, implementation PSD2 Directive), and in compliance with European regulations and/or standards as well as rules and standards issued by control and supervisory authorities or by other competent authorities. If the customer is a “consumer” pursuant to Legislative Decree 206 dated 6 September 2005, we inform that, without the need to acquire his/her consent, on the basis of articles 120-undecies and 124-bis of the TUB (Consolidated Banking Act), the Bank will process the data needed to assess the creditworthiness. This is

¹ General Data Protection Regulation

BANCA UBAE S.P.A.

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CAPITALE SOCIALE EURO 261.185.870,00 INT. VERS.PIVA IT00925501009 N. ISCR. REG. IMP. DI ROMA E COD. FISC. 00716130588 ADERENTE AL FONDO INTERBANCARIO DI TUTELA DEI DEPOSITI

accomplished by using suitable information, provided by the customer when appropriate and obtained by consulting a relevant data bank when necessary. Art. 6 para. 1 letter c) of the GDPR provides the legal grounds for the processing that must be carried out in compliance with the law, regulations and provisions issued by legitimate authorities. The conferment of data is obligatory. The data shall be stored for the period prescribed by law and, specifically, for ten years from the date of termination, for any reason, of the contract or from the date of an authority's binding decision (such as a court ruling) subsequent to the termination.

4.3 Purposes needing consent

The customer's consent to processing, which can be given by marking the corresponding boxes in the annexed form and subsequently revoked at any time, is necessary for the following:

4.3.1 Processing of special categories² of personal data

In order to process special categories of personal data [as in the case of insurance-backed mortgages, taking out a life insurance policy or the ongoing payment of membership fees to labour unions, political parties and various associations, by means of bank transfers or salary deductions] we need the customer's written consent, constituting the legal grounds for processing pursuant to articles 7 and 9 para. 1 letter a) of the GDPR. Without this consent, it is impossible for the Bank to carry out the operations reported in the parentheses above. Should the customer's consent be revoked, it will be equally impossible for the Bank to effect these operations. The special categories of data are processed up until the moment of revocation or termination, for any reason, and will be stored for the prescribed period of time (10 years).

4.3.2 Processing for marketing reasons

Business promotional activities will be carried out through postal and electronic correspondence (telephone calls also through automated call systems, faxes, emails, SMS or MMS messaging, communications on social media on which the customer is enrolled, reserved area UBAE site).

4.3.2.1 Direct Marketing

The Bank intends to handle personal data in order to send promotional and commercial communications marketing its own products and services, as well as proceed to direct selling, market research and surveys on the quality of products and services provided, also on the basis of data already in its possession. The consent to processing [art. 6 comma 1 letter a) of the GDPR] provides the legal grounds for the data processing. Without this consent, it is impossible for the Bank to effect said communications – without consequences regarding his/her requests and business relations underway. The sole exception regards emails, not refused by the customer, for the sale of products and services analogous to those he/she has already acquired and for which, upon acquisition, he/she provided his/her email address. The data will be processed up to the time of revocation or termination, for whatever reason, of the processing. Should the consent be given by the customer to profiling as per point 4.3.2.4, the marketing activity will only take account of data regarding the last 24 months.

4.3.2.2 Marketing third-party products

The Bank intends to process personal data in order to send out promotional and commercial communications regarding products and services provided by third parties as well as proceed to direct sales and market research. The consent to processing [art. 6 comma 1 letter a) of the GDPR] provides the legal grounds for processing. Without this consent, it is impossible for the Bank to send out communications regarding third-party products without consequences for his/her requests and relations underway. The data will be processed up to the time of revocation or termination, for whatever reason, of the processing. Should the customer give his/her consent to profiling as per point 4.3.2.4, the marketing activity will only take account of data regarding the last 24 months.

4.3.2.3 Release of data to third parties for commercial reasons

The Bank can share personal data with third-party companies that process data in order to market their own products and services, as autonomous data controllers. The list of said subjects, broken down by product sector and with regard to which the data subject can exercise his/her rights as envisaged by the GDPR, can

² Personal data that reveal racial or ethnic origin, political opinions, religious or philosophical convictions or trade union membership as well as genetic data, biometric data used to unequivocally identify a physical person, data regarding a person's health, sexual life or sexual orientation

be accessed on the Bank's website www.bancaubae.it. The consent to processing [art. 6 para. 1 letter a) of the GDPR] provides the legal grounds for the processing. Without this consent, it is impossible for the Bank to release the data, without consequences for your requests and relations underway. The data will be processed up to the time of revocation or termination, for whatever reason, of the processing. Except for processing carried out by subjects to whom the data have been released, the data will be stored for a period prescribed by law (10 years).

4.3.2.4 Profiling

Through processing, with or without the use of electronic instruments, customers' personal and financial data as well as preferences, consumer habits and behaviours, the Bank can identify and offer the services and products best suited to him/her and his/her economic situation. The consent to processing [art. 6 para 1 letter a) of the GDPR] provides the legal grounds for the processing. Without this consent, it is impossible for the Bank to effect the profiling, without consequences to your requests and relations underway, though the lack of consent prevents the Bank from being able to propose tailored offers. The data will be processed up to the moment of revocation or termination, for any reason whatsoever, of the processing. Profiling activities will take into consideration data regarding the last 12 months.

5. Subjects who are informed about or come into contact with the data

With regard to the relations and services activated, customer's personal data can be communicated to public institutions (Italy's Ministry of Economy and Finance, Italy's Inland Revenue Service and Regional Agency) and Supervisory Bodies (CONSOB, Bank of Italy)

In order to meet our contractual and legal obligations and for the aims of legitimate interests, of the Bank or those of third parties, when processing personal data the Bank avails of collaboration with trusted external service providers. The data are shared with such providers, which belong to the following categories:

- ✓ Suppliers of IT and telecommunication services;
- ✓ Firms that manage payment and electronic connection services amongst banks;
- ✓ Subjects that manage national or international systems to control fraud;
- ✓ Managers of credit information systems (SIC);
- ✓ Suppliers of paper document filing services;
- ✓ Suppliers of electronic storage services;
- ✓ Business information suppliers;
- ✓ Suppliers of logistics, transportation, shipping and communication delivery services;
- ✓ Credit factoring companies;
- ✓ Companies and professionals that carry out credit collection activities;
- ✓ Audit firms.

If the customer's consent to data processing is given for the purposes of promotional activities, his/her data could also be communicated to:

- ✓ Companies specialised in marketing and promotional activities;
- ✓ Business partners;
- ✓ Companies specialised in customer segmentation.

These subjects operate as autonomous data controllers, unless designated by the Bank as being in charge of processing for their field of competency. The list is constantly updated and can easily be accessed free of charge on the website www.bancaubae.it

Personal data are processed, even circulated among branches, by employees and other collaborators, in their capacity as persons authorized and tasked with the processing, also temporarily employed by the competent Bank's services and branches.

6. Transfer abroad of personal data

In some cases, the Bank can transfer personal data to foreign countries, for example in the case of services in cloud computing. If the countries are outside the EU the transfers are allowed in the case of adequacy decisions issued by the EU Commission and in the presence of international agreements or with the adoption

adequate guarantees of protection as contractual clauses such as those issued by the EU Commission. Additional information on such guarantees can be requested through communication to the above contacts. Moreover, the Bank informs that in order to carry out international financial operations customers are required to use the international messaging service managed by SWIFT (Society for Worldwide Interbank Financial Telecommunication), which temporarily keeps the data needed for the transaction in servers located in the United States. In accordance with that set forth in an international agreement published in the European Union's Gazette L. 195 dated 27 July 2010, these servers can be accessed by competent US authorities (specifically, the Treasury Department) in order to fight terrorism (see <http://www.swift.com> for information on data protection).

7. Rights of the data subject

Data subjects have the right (articles 15-22 of the GDPR), at any moment, to receive confirmation of whether or not their personal data are being processed, to access said data and to know the content and origin, verifying their correctness or requesting an amendment, update, or rectification. Moreover, said subjects have the right to request data portability, erasure or restriction of processing and to revoke consent as well as to lodge a complaint with the supervisory authority and, in any case, for legitimate reasons, to object to their processing. The rights of the data subject can be exercised by contacting such contacts. For legitimate reasons, they can also object to the data processing.

Banca UBAE SpA

N.D.G.....Name and surname

1) Consent to data processing

Having read the privacy notice given to me by Banca UBAE SpA for:

1) Processing of special categories of data

The customer is warned that if he/she refuses to grant his/her consent it will not be possible to process special categories of data pursuant to that set forth in 4.3.1 of the privacy notice, I:

☐ give my consent ☐ deny my consent

Date.....Signature

2) Purposes of commercial offers and profiling

The customer is warned that if he/she refuses to grant his/her consent it will not be possible to process data for the purposes set forth in points 4.3.2.1 to 4.3.2.4 of the privacy notice, without consequences to his/her requests and existing relations, I:

Consent		Purpose
YES	NO	
		4.3.2.1 – Commercial offers proposed by the Bank
		4.3.2.2 – Promotions from the Bank for third-party products and services
		4.3.2.3 – Release of data to third parties promoting their own products and services
		4.3.2.4 – Profiling to optimise commercial offers

Date

Signature