



PERSONAL DATA PROTECTION “PRIVACY CODE”

INFO NOTE PURSUANT TO ART.13 OF LEGISLATIVE DECREE NO. 196/2003

CUSTOMERS

A) Purposes and modalities of data processing

Banca UBAE S.p.A. (hereinafter "Bank"), in its capacity as data controller in accordance with the “Privacy Code” informs, in order to allow a conscious expression of the consent hereby requested, that the personal information collected from the customers or third parties, as in the case of credit/debt operations requested by other subjects, or on the occasion of the acquisition of commercial information by specialized companies or, within legal limits, from public records, can be processed for:

1. the purpose of fulfilment of obligations under applicable laws, regulations and communitarian legislation, or provisions issued by Authorities entitled by law and by the supervision and control bodies, such as the obligations provided for by the anti money laundering law (the collection of personal data necessary for these purposes is mandatory and the processing does not require the consent of the concerned parties since such a process is related to the compliance with these obligations /provisions);

2. administrative and accounting purposes, connected and instrumental for the execution of obligations arising from transactions with customers or their performance, before the conclusion of contracts, upon specific customers’ requests, including by means of distance communication including internet banking and telephone customer service. In this case it is not necessary to give consent to the processing of these data since such process is functional to the management of the aforementioned relationships or the execution of requests;

3. commercial purposes, or to provide information to customers (including by means of distance communication, such as, but not limited to, postal correspondence, telephone calls including by automated calling systems, fax, email, SMS or MMS messages or other type) on products, services or initiatives of the Bank or third parties, promoting them, conduct market research and / or verify the quality of the products or services offered to customers (even via phone calls or sending questionnaires), optimize the offer itself (including focused and selected analysis) as well as deepen, after the end of the relationship with customers, the reasons for such termination. The conferment of the data necessary for these purposes is not mandatory and their processing requires the consent of the involved person.

The processing takes place through manual and automated instruments (including the use of electronic instruments and links) with modalities strictly related to the aforesaid purposes (possibly also by means of data profiling or comparison) and, anyway, in order to ensure data security, protection and confidentiality.



B) Sensitive data

Furthermore, it can also happen that in connection with specific transactions or products requested by the customer (eg. Disbursement of loans secured by insurance, life insurance policies or payments on an on-going basis of membership fees to trade union, political parties and various associations, through payment orders or deductions from salary) or for the management of certain client relationships with the Bank, the Bank is in possession of - and process - data that the law defines as "sensitive" [art. 4 paragraph 1 letter d) of Legislative Decree no. 196/2003], such as those revealing the ethnic group, philosophical and religious convictions, membership of trade unions and political parties, the state of health. For their processing the law requires a special consent process, which is reported on the form reproduced at the end of this document. In this case, without the customer's consent, the Bank may not perform those operations and manage those relationships that require the processing of sensitive data, except the cases expressly provided for by the law.

C) Categories of subjects to whom data can be reported

Within the Bank, employees or collaborators in charge of data processing, including external employees in the various departments of the Bank and the sales network offices (branches and consultants) may get to know personal data. For operational needs, the banking customers' details can be accessed by the relevant tasked staff in circularity (access by staff in charge at different teller from the one where the account is based). To achieve the abovementioned purposes, the Bank may report your data to trusted subjects, including foreign ones, belonging to the following categories in order to conduct the related processing and communications:

- ✓ Subjects identified by law such as Judicial Authorities, Police, Revenue Agency, Consob, IVASS Land Agency, Bank of Italy (including through mandatory reports to the Credit Risk Bureau and the Interbank Alert Centre);
- ✓ subjects who offer banking, financial or insurance services (including mutual guarantee funds (trust), fall into this category also known as "Benefondi": the interbank practice which provides, as part of the negotiation of checks, the communication between the drawee bank and paying bank, for the existence or absence of an adequate balance for the payment of checks presented for collection);
- ✓ companies belonging or who will belong to the banking group to which the Bank belongs to or will belong to or otherwise controlled and/or connected to the Bank, including in relation to obligations for the purposes of anti-money laundering and terrorism fight under Articles. 41 and 42 of Legislative Decree 21 November 2007, No. 231 and subsequent amendments and/or integrations;
- ✓ subjects of which the Bank offers products and services;
- ✓ subjects offering services for the management of the IT system and the Bank's IT programs;
- ✓ subjects who perform services for the acquisition and processing of data coming from documents or media (ex.: Checks, bills);
- ✓ subjects who carry out data processing and transmission of communications from/to customers (ex. Enveloping, e-mail management);
- ✓ subjects performing documentation filing;
- ✓ subjects providing customer support activities (ex. by telephone);



- ✓ those involved in the management of payment services and computer networks, collectors and treasuries;
- ✓ subjects managing national and international systems for the control of frauds;
- ✓ subjects who carry out credit reclaim;
- ✓ subjects assignees of receivables;
- ✓ professionals (such as lawyers, notaries, consultants) and public officials;
- ✓ subjects that perform marketing activities, market surveys or promote the products of the bank or third parties;
- ✓ subjects that survey financial risk for the purpose of the credit default risk prevention;
- ✓ subjects performing financial investigative activities for the fight of international terrorism;
- ✓ subjects performing monitoring, auditing and certification of the activities performed by the Bank also in the interest of customers,
- ✓ subjects carrying out inspections (for example, for the ascertainment of prejudicial formalities (mortgages, sales, etc.) charged to the customer at the Conservatories of RR.II. or at the Registry of the courts (in order to ascertain the pending bankruptcy procedures),
- ✓ subjects assignees of companies, a business unit of legal relationships identifiable en bloc or of individual legal relationships,
- ✓ subjects resulting from the Bank transformation, merger and breakup,
- ✓ subjects managing the activities related to the issuance and use of credit cards, debit and prepaid cards (ex.: Cartasi S.p.A.)
- ✓ subjects involved in the steps for granting State incentives (ex.: contributions in interest and capital, rotating funds, the exchange rate risk, etc.) on loans to customers,
- ✓ public and/or private subjects subscribers of agreements for granting "soft loans".

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The subjects belonging to the aforesaid categories will use data received as persons charged of the processing for their specific competences, except the case in which they were tasked by the Bank as external processors/controllers of processes assigned to them. The updated list of the latter can be found on the website: www.bancaubae.it - section "Privacy".

The Bank does not disclose personal data.

Furthermore, the Bank informs that the personal data contained in the messages regarding financial transfers will be provided for the sole purpose of preventing and combating terrorism and its financing, to public authorities of the EU Member States and third countries among which the United States of America.

In particular, data can be transferred to the department of Treasury of the USA as provided in the international Agreement between the European Union and the United States "on the processing and transfer of data on financial messaging from the European Union to the United States for the purposes of the control program for financial transaction of terrorists" published in the European Union Official Journal L 195 of 27 July 2010. In particular, in relation to certain financial transactions (ex.: foreign bank transfers), by excluding in any case data related to transactions executed within the single payments area (SEPA), the US Treasury department can make an individualized request (not massive) not addressed to the bank, but to one or more providers of international financial messaging services, specifically accredited, the bank uses for carrying out

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CAPITALE SOCIALE EURO 55.860.000 INT. VERS. RIVA IT00925501009 N. ISCR. REG. IMP DI ROMA E COD. FISC. 00761930588 ADERENTE AL FONDO INTERBANCARIO DI TUTELA DEI DEPOSITI



financial transactions (currently: SWIFT - Society for Worldwide Interbank Financial Telecommunication - internet site: www.swift.com). To such processing procedures apply the strict guarantees provided for in the aforesaid Agreement (ex.: prior examination of compliance of the request by Europol, high security standards, integrity and proportionality of the data, purposes of the processing, the maximum period for keeping data and their limited subsequent transfer to other entities, etc.). More information is available on the website of the US Treasury Department (www.treasury.gov) as well as on the one of the European Union (<http://europa.eu>). The rights for access, amendment, cancellation or block of data related to this specific processing must be exerted according to what stated in art. 15 and 16 of the Agreement, not by addressing to the Bank but directly to the guarantor of Privacy and for the personal data protection (Internet site: www.garanteprivacy.it).

D) Data Controller

Data controller of personal data is Banca UBAE S.p.A., head-quartered in Via Quintino Sella, 2 00187 Rome.

E) Rights as per art. 7 of Legislative Decree. No. 196/2003

We would like to inform you that art. 7 of the Legislative Decree No. 196/2003 grants you some rights.

In particular, it is possible to know personal data held by the Bank, their origin and their utilization, it is also possible to obtain their update, their amendment or, if interested, their integration as well as their cancellation or block if processed illegally. It is also possible to oppose, for legal reasons, to the processing of data; the opposition is always possible and free of charge in case of advertising purposes, commercial communication or market survey.

Lastly, we would like to inform you that for the purposes of exerting the rights, according to the aforesaid art. 7, and in order to obtain any possible further information, a request in writing can be addressed to:

BANCA UBAE S.p.A. to the aforementioned address or by fax: No° 06/42046435 by using the specific form available in the website www.bancaubae.it - section "Privacy".

Messrs. BANCA UBAE S.p.A.

Place.....

Date...../...../.....

I, the undersigned,

Name and Surname/Company's Name

N.D.G.

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aware of the info note on the personal data processing for commercial purposes and aware of the fact that the absence of my authorizations herebelow requested will not undermine the existing, or those to be started, relationships with the bank

A)

I give my consent
to the data processing

I refuse my consent

The processing of my personal data by the Bank – including the communication to subjects belonging to the aforesaid categories, for the related processing – for the purposes of **individualizing the quality of products and services rendered** by the Bank or by the companies belonging or that will belong to the same banking group the Bank belongs to or, anyhow, controlled or related;

B)

I give my consent
to the data processing

I refuse my consent

The processing of my personal data by the Bank – including the communication to subjects belonging to the aforesaid categories, for the related processing – for **all other commercial purposes as in item A(3) of the info note in relation to products and services of the Bank** or companies belonging or that will belong to the same banking group the Banks belongs to or, anyhow, controlled or related;

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C)

I give my consent
to the data processing

I refuse my consent

The internal processing of my personal data by the Bank **for all other commercial purposes as in item A(3) of the info note in relation to products and services of third parties other than the Bank** or companies belonging or that will belong to the same banking group the Banks belongs to or, anyhow, controlled or related;

D)

I give my consent
to the data processing

I refuse my consent

The communication, by the Bank, **for all other commercial purposes as in item A(3) of the info note, of my own personal data to subjects belonging to the aforesaid categories, for the related processing, in relation to products and services of third parties other than the Bank** or

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companies belonging or that will belong to the same banking group the Bank belongs to or, anyhow, controlled or related;

E)

I give my consent
to the data processing

I refuse my consent

The **processing of sensitive data**, already gathered or that will be gathered by the Bank following the operations and contracts indicated in item B) "Sensitive data" of the info note, as far as the processing is necessary for the specific purpose of the operation or services I requested. I am aware that, in the lack of my authorization, the consequent operations/services implying sensitive data processing will not be executed.

Signature⁽¹⁾:

CONSENT GIVEN BY LEGAL PERSONS

*I am aware of the info note given to me by Banca UBAE SpA pursuant to Legislative Decree No. 196/2013 for the **sending of electronic communications** with the purposes stated in item A3) through phone calls with or without operator, SMS, MMS, fax, e-mail, social media (such as Facebook and Twitter) to the address/number given to the Bank, that it is my right to replace in the future (and in this case the authorization I am hereby giving will be still valid, bar my specific declaration for revocation):*

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F)

I give my consent
to the data processing

I refuse my consent

Signature⁽²⁾:

- (1) Signature of the involved person or the subject that legally represents him/her (for individuals legally unable to sign: tutor, parent, support administrator; the company's owner for individual companies)
- (2) Signature of the subject who legally represents the legal person (for companies and bodies: Chairman, Sole Administrator)
- (3) **N.B. for the Branch: besides the info note, if requested by the subject, a copy of the present authorization form is also to be delivered.**

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