



In accordance with Regulation EU 2016/679 (hereinafter "GDPR" or "General Data Protection Regulation") and current national legislation on personal data protection (hereinafter, together with the GDPR, "Privacy Regulations"), Società per Amministrazioni Fiduciarie "Spafid" S.p.A., with registered office in Milan, Via Filodrammatici 10 (hereinafter, the "Company" or the "Data Controller"), in its capacity as Data Controller, is required to provide information regarding the processing of personal data.

Personal data held by the Company are generally collected directly from the data subject and occasionally may come from third parties when your data are acquired through public and private databases (e.g., cadastral/mortgage searches, adverse reports/protests, etc.).

## a) Purpose of processing and obligation to provide data

All personal data are processed, in compliance with legal provisions and confidentiality obligations, for purposes strictly connected and instrumental to the following:

- I. Purposes related to obligations imposed by law, regulations, EU legislation, as well as provisions issued by competent Authorities or Supervisory and Control Bodies. The provision of personal data for these purposes **is mandatory**. Failure to provide data will prevent the Company from carrying out the activity requested by you, which presupposes the Company's compliance with a legal obligation. The legal basis for processing is identified in the fulfillment of legal obligations to which the Company is subject.
- II. Purposes strictly connected and instrumental to the execution of contractual obligations, fulfillment, before the conclusion of the contract, of specific requests from the data subject and management of out-of-court and/or judicial disputes (e.g., warnings and activities functional to the forced recovery of credit, etc.). The provision of personal data for these purposes **is mandatory** as it is necessary for the performance of obligations arising from the contract. Failure to provide your data will make it impossible for the Company to follow up on your pre-contractual/contractual requests and to execute the contract. The legal basis for processing is identified in the need to perform the contract entered into with the Company.

In addition, your personal data collected for the above purposes may be processed by the Company for purposes related to the management of disputes or any litigation, as well as risk management (the legal basis for processing is identified in the Company's legitimate interest in ascertaining, exercising, or defending its rights and preventing fraud).

## b) Legal basis

The legal basis are provided by the fulfillment of laws and contractual obligations and by the legitimate interest of the Company as described above.

## c) Processing methods

The processing of your personal data will take place, in accordance with the provisions of Privacy Regulations, using paper, computer, or telematic tools, with logic strictly related to the purposes indicated and, in any case, in ways suitable to ensure their security and confidentiality in accordance with Privacy Regulations. For risk management purposes, telephone conversations or telematic data traffic may be recorded.

## d) Categories of processed data

In relation to the purposes described above, the Company processes your personal data, including, for example and not exhaustively, personal details (such as, for example, name, surname, address, telephone number, email, date of birth, identity card, health card, tax code, marital status, nationality, customer code), data related to credit requests/relationships, accounting data.

## e) Communication and disclosure of data

For the pursuit of the purposes described in point a) above, your personal data will be known to the Company's employees acting as authorized/encharged of processing.

Furthermore, your data may be communicated to:

- a) other companies belonging to the Group;
- b) entities providing support services for the execution of instructions given by you;
- c) entities engaged in the issuance, offer, placement, negotiation, and custody of banking, financial, and insurance products and/or services;
- d) entities handling the stuffing, shipping, and archiving of documentation related to customer relationships;
- e) other entities that the Company uses for the supply of the requested product or service;
- f) entities providing services for the management of the Company's information system;
- g) entities managing credit recovery or providing professional consultancy and tax, legal, and judicial assistance services;
- h) entities responsible for auditing and certifying the balance sheet;
- i) authorities and supervisory and control bodies and, in general, public or private entities with public law functions;
- j) entities managing national and international systems for fraud control against banks and financial intermediaries;
- k) archive established at the Ministry of Economy and Finance (hereinafter MEF), in accordance with Articles 30-ter, paragraphs 7 and 7-bis, and 30-quinquies of Legislative Decree no. 141 of August 13, 2010, exclusively for the purposes of preventing identity theft. The results of the authenticity verification procedure will not be disclosed but may be communicated to Authorities and Supervisory and Control Bodies;
- l) other financial intermediaries belonging to the Group in case the operations carried out by you are deemed "suspicious" under Anti-Money Laundering legislation.

The complete and updated list of Data Processors to whom your personal data may be communicated (companies of the Mediobanca Group and/or third parties) is available on the website [www.spafid.it](http://www.spafid.it) in the "Privacy" section.

Your personal data will be transferred outside the European Economic Area only in the presence of a decision of adequacy by the European Commission or other adequate safeguards provided by Privacy Regulations (including binding corporate rules and standard contractual clauses).

The personal data processed by the Company are not subject to disclosure.

## f) Data retention

In accordance with the principles of proportionality and necessity, personal data will be kept in a form that allows the identification of data subjects for a period not exceeding the achievement of the purposes for which they are processed, in accordance with the principles of sound and prudent management of the Banking Group of which the Data Controller is part, taking into account:

- the need to continue to keep personal data collected to offer services agreed with the user or to protect the legitimate interest of the Data Controller, as described in the above purposes, in compliance with assessments made by the Company;

• the existence of specific legal and reputational risks, as well as regulatory (codification legislation, anti-money laundering legislation, legislation on investment services, tax monitoring legislation, etc.) or contractual obligations that make it necessary to process and retain data for certain periods of time.

In any case, for all processing purposes indicated, the retention periods provided by the regulations will be respected, unless there are causes of interruption (e.g., ongoing legal proceedings) and unless the current law in force sets different terms.

#### **g) Rights of the data subject**

Individuals to whom personal data refers have the right at any time to obtain confirmation of whether or not the same data exists and to know its content and origin, verify its accuracy, or request its integration or updating, or rectification (Articles 15 and 16 of the GDPR).

Furthermore, data subjects have the right to request erasure, restriction of processing, withdrawal of consent, portability of data, as well as to lodge a complaint with the supervisory authority and to object in any case, for legitimate reasons, to their processing (Article 17 and onwards of the GDPR). These rights can be exercised by written communication accompanied by a valid identity document of the data subject to be sent to: [privacy@spafid.it](mailto:privacy@spafid.it). The Data Controller, also through the designated structures, will handle your request and provide you, without unjustified delay, with information regarding the action taken regarding your request.

#### **h) Data Controller and Data Protection Officer**

The Data Controller for data processing is Società per Amministrazioni Fiduciarie "Spafid" S.p.A., with registered office in Milan, Via Filodrammatici 10. Spafid has designated the Data Protection Officer of the Group as the Data Protection Officer (DPO).

The Data Protection Officer can be contacted at the following addresses:

- [DPO.mediobanca@mediobanca.com](mailto:DPO.mediobanca@mediobanca.com)
- [dpomediobanca@pec.mediobanca.com](mailto:dpomediobanca@pec.mediobanca.com)