



## **PERSONAL DATA PROCESSING NOTICE** (customers and shareholders) pursuant to arts 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Notice last updated: February 2019

Before processing your data, we present this notice prepared by Banco BPM (hereinafter simply the "Bank"), required for the protection of your personal data, according to the provisions of applicable legislation, and specifically, the Regulation on the Protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation").

The information below will be useful to help you understand:

- which parties process your data and how to contact them;
- how your data is analysed and for what purposes;
- the rights available to you.



## **USEFUL CONTACTS**

Banco BPM is the Company that processes your data and for the purposes of the Regulation, it is considered to be the Data Controller. In this role, it is responsible for guaranteeing application of the organisational and technical measures necessary and appropriate for protection of your data. The registered office of the Bank is in Milan, Italy, in Piazza F. Meda no. 4, 20121.

Banco BPM uses specifically designated External Data Processors, Co-Data Controllers, and Data Controllers, a list of which is available on the website [www.bancobpm.it](http://www.bancobpm.it) under the section Privacy, or from our Branches.

Furthermore, the Bank has appointed a Data Protection Officer (hereinafter also DPO), responsible for guaranteeing observance of the regulations for protection of your privacy, who may be contacted regarding issues concerning the processing of your data at the following addresses: Piazza F. Meda n. 4, Milan—20121, Italy  
[protezionedati@bancobpm.it](mailto:protezionedati@bancobpm.it).

Further information regarding your rights can be accessed in the dedicated area "Your Rights".



## **INFORMATION REGARDING PROCESSING**

You are informed that all personal data that you provide us with or that is communicated to us by third parties will be processed in compliance with applicable legislation on privacy and data protection; therefore, the Bank undertakes to process such data observing principles of fairness, lawfulness and transparency, in line with the purposes indicated below, collecting the data to the exact extent necessary for processing, and using it only via personnel authorised for the purpose and trained in order to guarantee the necessary confidentiality of information provided.

Specifically, the Bank may use your data for:

1) Purposes required for execution of the company contract of which you are a party (on the basis of the by-laws, internal regulations and company resolutions), to fulfil obligations, including those of an administrative or accounting nature or for management of shareholders' meetings (including sending of communications regarding the Bank's performance and/or particular company events) or to meet requirements deriving from your role as Bank shareholder, also via remote communication.

Given that the legal basis is established by the aforementioned contract, processing of your personnel data for these purposes does not require your permission.

2) To fulfil legal obligations (e.g. updating and management of shareholders' register), and those under regulations, and EU and supervisory rules, as well as standards, codes and procedures approved by Authorities and other competent Institutions (e.g. tax and contribution assessments, anti-money-laundering initiatives), considering that the Bank assumes the role of issuer of the shares in your possession.

The legal basis in this case is the fulfilment of a legal obligation and therefore your consent is not required.

3) To exercise or defend a right in the context of judicial proceedings, as well as administrative proceedings or arbitration and conciliation, in the cases defined by law, European legislation and regulations. Also in this case, pursuant to legislation your consent is not required.

In performance of the activities described, the Bank will not process special categories of personal data.

In addition, the Bank may only process your judicial data within legal limits, i.e. exclusively where expressly indicated by law or following prior authorisation from the Data Protection Authority. Your consent is not required in such cases.

#### Period for storage of your data

The Bank will store your data for the period of time strictly necessary for the purposes for which the data was collected, observing the terms defined or other time frames where established by legislation and regulations of reference or required for judicial reasons or justified by the public interest.

#### Transfer of and access to your data

The Bank, without it being required to request your consent, may communicate your personal data to various categories of recipients, including:

- Companies of the Banco BPM Group (e.g. ProFamily, Banca Akros, Banca Aletti etc.) for the performance of administrative and service-related activities.

Parties operating inside and outside of the European Union (e.g. credit institutes, consultants, professional studios, companies which provide IT systems and services, companies which provide services related to market research and marketing, insurance companies, debt-collection companies, consumer credit companies, leasing companies, etc.) that may process your data in the role of autonomous data controllers, external data processors or co-data controllers.

Your data shall primarily be processed within the European Union. The Bank reserves the right to transfer your personal data to non-EU countries to meet possible requirements of a technical and organisational nature. In any case, processing of your data will occur observing the appropriate guarantees defined by applicable legislation such as the adequacy decisions of the European Commission, standard contractual clauses approved by the European Commission or other legal tools.

- Judicial authorities, the Italian Revenue Agency, pensions organisations, administrative and sector authorities, as well as parties to which communication of the data is a legal obligation.

The parties listed will process the data in their role as autonomous data controllers. Companies of the Banco BPM Group or subsidiaries or equivalents and external collaborators assigned to services and offices involved in the management of relationships with shareholders, including administrative and auditing bodies and internal and external structures that perform technical duties, support (specifically, legal or IT services, etc.) and company auditing for the Bank.

In performance of the aforementioned activities, the Bank may communicate your data to specific parties, including external parties, also abroad, belonging to certain categories for them to carry out processing and communication.

The parties belonging to these categories may process your data in their role as autonomous data controllers, external data processors or co-data controllers.

The Bank shall not publicly distribute your personal data.



## YOUR RIGHTS

In relation to the data processed, the Bank guarantees you the possibility to:

- receive confirmation of the existence or otherwise of personal data regarding you and copies thereof in an intelligible form;
- obtain updating, amendment or supplementing of your data;
- request deletion of your data, within the limits defined by legislation;
- oppose, entirely or in part, the processing of personal data that regards you;
- limit processing, in the case of a breach, request for correction or opposition;
- request portability of data processed electronically, provided on the basis of consent or a contract;
- revoke consent to processing of your data, where applicable;
- in relation to entirely automatic profiling, obtain human intervention by the Data Controller to express your opinion or contest the decision.

Finally, where considered appropriate, you may present a complaint to the Data Protection Authority, which acts via the methods and forms defined by law; for further information you may consult the Authority's website [www.garanteprivacy.it](http://www.garanteprivacy.it)

For this purpose, the Bank has provided a specific section on its website (Privacy area), to allow you to submit requests free of charge. Here, you can download the form and send it, once filled in, to the following email address: [protezionedati@bancobpm.it](mailto:protezionedati@bancobpm.it), or via recorded postal delivery to the registered office of the Bank: Piazza F. Meda n. 4, 20121 Milano, Italy, for the attention of the Data Protection Officer.

You are informed that the Bank undertakes to reply to your requests within one month, except in particularly complex cases, where a maximum period of three months may be required. In any case, the Bank shall explain the reason for the delay to you within one month of your request.

The outcome of your request will be provided in writing or in electronic form. In the case that you have requested correction, deletion or limitation of processing, the Bank undertakes to communicate the outcome of your request to each of the recipients of your data, except in the case that this is impossible or implies a disproportionate effort.

The Bank specifies that it may refuse your request if it is unfounded or excessive, particularly where of a repetitive nature. The Bank maintains a register to track your requests for this purpose.