



INFORMATION ON THE PROCESSING OF PERSONAL DATA (members and shareholders) pursuant to Articles 13 and 14 of Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016

Date of disclosure update: February 2024

Before proceeding with the processing of your data, we would like to provide you with the information provided by Banco BPM (hereinafter simply the "Bank"), which is necessary for the protection of your personal data, in accordance with the relevant legislation and, in particular, with the Regulation on the protection of individuals with regard to the processing of personal data and the free movement of such data (hereinafter the "Regulation").

The information below will help you to understand:

- which parties process your data and how to contact them;
- how your data are analysed and for what purpose;
- the rights it has at its disposal.



USEFUL CONTACTS

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

Banco BPM has appointed a Data Protection Officer (also DPO) to ensure compliance with the rules for the protection of your privacy, who can be contacted for matters relating to the processing of your data at the following addresses: Piazza F. Meda n. 4, Milan-20121, protezionedati@bancobpm.it, protezionedati@pec.bancobpm.it.

Banco BPM employs specially designated External Data Processors, Joint Data Processors and Data Controllers, the list of which is available upon request to be forwarded to the same contact details. You can find more information on your rights in the dedicated space "Your rights".



INFORMATION ON TREATMENT

We would like to inform you that all personal data that you provide us with or that may be communicated to us by third parties will be processed in accordance with the current legislation on privacy and data protection, according to principles of correctness, lawfulness, transparency, in compliance with the purposes indicated below. The data will be collected to the extent necessary and accurate for processing, using only personnel authorised and trained for this purpose and in order to guarantee the necessary confidentiality of the information provided.

In particular, the Bank may use your data for:

1) Purposes necessary for the performance of the corporate contract to which you are a party (in particular, by virtue of the articles of association, internal regulations, corporate resolutions), to carry out obligations, including administrative, accounting and shareholders' meeting management obligations (including the sending of notices on the bank's performance and/or on particular corporate events) or to respond to requests arising from your role as a shareholder and member of the bank, including by means of remote communication techniques.

Since the legal basis is the a f o r e m e n t i o n e d contract, the processing of personal data for these purposes does not require your consent.

2) To comply with the provisions laid down by law (e.g. updating and management of the shareholders' register), by r e g u l a t i o n s , by EU and supervisory legislation, as well as by rules, codes, procedures approved by competent Authorities and other institutions (by way of example only: tax and fiscal assessments, anti-money laundering), bearing in mind that the Bank assumes the role of issuer of the shares held by you.

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

3) To assert or defend a right in court, as well as in administrative proceedings or arbitration and conciliation procedures, in cases provided for by law,

by European legislation, regulations. Again, in accordance with the regulations, your consent is not required.

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

In addition, the Bank may process your judicial data only within the limits of the law, i.e. only if expressly provided for by law or following authorisation by the Data P r o t e c t i o n Authority. In such cases, your consent is not required.

Period of retention of your data

The Bank will keep your data for as long as is strictly necessary for the purposes for which they were collected, in compliance with the prescriptive periods or within the different periods that may be established by the relevant legal and regulatory provisions or that are necessary for the requirements of justice or the public interest.

Transfer and access to your data

The Bank - without your consent being required - may communicate your personal data to various categories of recipients, such as:

- Banco BPM Group companies (such as, Banca Akros, Banca Aletti etc....) in order to perform administrative and service activities.

- Subjects operating within and outside the European Union (for example: credit institutions, consultants, professional firms, companies providing IT systems and services, companies providing services relating to market research and commercial promotion, insurance companies, debt collection companies, consumer credit companies, leasing companies, etc.) who may process

your data as autonomous data controllers, external data controllers or joint data controllers.

Your personal data will mainly be processed

within the territory of the European Union. The Bank reserves the right to transfer your personal data to countries outside the EU to meet technical and organisational requirements. In any event, the processing of your data will be carried out in compliance with the appropriate safeguards provided for by current legislation such as the European Commission's adequacy decisions, standard contractual clauses approved by the European Commission or other legal instruments.

- Judicial Authorities, Tax Authorities, Social Security Authorities, Administrative Authorities and those to whom communication is mandatory by law.

These parties will process the data in their capacity as autonomous data controllers. Companies belonging to the Banco BPM Group or otherwise controlled or assimilated and external collaborators assigned to services and offices involved in the management of relations with shareholders, including administrative and control bodies as well as structures, internal or external, that perform technical, support (in particular legal services, IT, etc.) and corporate control tasks for the Bank.

For the pursuit of the aforementioned Purposes, the Bank may communicate your data to certain entities, including foreign entities, belonging to certain categories in order for them to carry out the related processing and communication.

Subjects belonging to these categories may process your data as autonomous data controllers, external data controllers or joint data controllers.

The Bank does not disseminate your personal data



HIS RIGHTS

With regard to the data processed, the Bank guarantees you the possibility of:

- obtain confirmation of the existence or non-existence of your personal data and a copy thereof in intelligible form;
- obtain the updating, rectification or integration of your data;
- request the deletion of their data, within the terms allowed by law;
- object, in whole or in part, to the processing of your personal data;
- restrict processing, in case of violation, request for rectification or opposition;
- request the portability of electronically processed data provided on the basis of consent or contract;
- withdraw consent to the processing of your data, where applicable;
- in relation to fully-automated profiling, obtain human intervention from the Controller in order to express one's opinion and contest the decision.

Lastly, if you consider it appropriate, you may lodge a complaint with the Garante per la Protezione dei Dati Personali (Italian Data Protection Authority), which is competent in the ways and forms provided for by law; for more information, you can consult the Garante's website at www.garanteprivacy.it

To this end, the Bank has set up a specific section (Privacy area) on its website, where you can submit your requests free of charge, where you can download the form and send it filled in by email to the following address protezionedati@bancobpm.it, or by pec to the address protezionedati@pec.bancobpm.it, or by ordinary mail to the Bank's registered office in Piazza F. Meda no. 4, 20121 Milan to the attention of the Data Protection Officer.

We inform you that the Bank undertakes to reply to your request within one month, except in particularly complex cases, for which it may take up to three months. In any event, the Bank will explain to you the reason for the wait within one month of your request.

The outcome of your request shall be provided to you in writing or in electronic format. If you request rectification, erasure or restriction of processing, the Bank undertakes to communicate the outcome of your request to each of the recipients of your data, unless this proves impossible or involves a disproportionate effort.

The Bank specifies that it may refuse your request if it is manifestly unfounded or excessive, in particular due to its repetitive nature. In this regard, the Bank has set up a register to track your requests.