



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



Date of update of the policy: February 2024

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

The information below will help you understand:

- who processes your data and how to contact them;
- how your data is analysed and for what purpose;
- the rights you have.



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 necessary and appropriate organisational and technical measures to protect your data. The Bank's registered office is in Milan, Piazza F. Meda no. 4, 20121.

Banco BPM has appointed a Data Protection Officer (also known as DPO) responsible for ensuring compliance with privacy protection regulations. The DPO 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 uses specially designated external data processors, joint controllers and controllers, a list of which is available upon request to be sent to the same contact details. You can find more information about your rights in the dedicated section "Your rights".



INFORMATION ON PROCESSING

We would like to point out that all personal data that you provide to us or that may be communicated to us by third parties will be processed in accordance with current privacy and data protection legislation, in accordance with the principles of fairness, lawfulness and transparency, in compliance with the purposes indicated below. The data will be collected to the extent necessary and accurate for processing, using only authorised and trained personnel 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 execution of the corporate contract to which you are a party (in particular, pursuant to the articles of association, internal regulations, corporate resolutions), to fulfil obligations, including administrative, accounting and meeting management obligations (including sending communications on the Bank's performance and/or particular corporate events) or to respond to requests arising from your role as a shareholder and member of the Bank, including through remote communication techniques.

As the legal basis is the aforementioned contract, the processing of personal data for these purposes does not require your consent.

2) To comply with provisions laid down by law (e.g. updating and managing the shareholders' register), regulations, EU and supervisory legislation, as well as rules, codes and procedures approved by authorities and other competent institutions (by way of example only: tax and fiscal assessments, anti-money laundering), taking into account that the Bank acts as the issuer of the shares you hold.

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

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

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

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

The Bank may process personal data relating to criminal convictions and offences or security measures, in compliance with applicable legislation. In such cases, your consent is not required.

Retention period for your data

The Bank will retain your data for the time strictly necessary for the purposes for which it was collected, in compliance with the limitation periods or any other time limits established by the relevant laws and regulations or necessary for reasons of justice or public interest.

Transfer and access to your data.

The Bank may communicate your personal data to various categories of recipients, such as:

- Banco BPM Group companies (e.g. Banca Akros, Banca Aletti, etc.) for the purpose of carrying out administrative and service activities.
- Entities operating within and outside the European Union (for example: credit institutions, consultants, professional firms, companies providing IT systems and services, companies providing market research and commercial promotion services, etc.) that may process your data as independent data controllers, external data processors or joint data controllers.

Your personal data will mainly be processed within the European Union. The Bank reserves the right to transfer your personal data to countries outside the EU to meet any technical and organisational requirements. In any case, your data will be processed in compliance with the appropriate

safeguards provided for by current legislation, such as the adequacy decisions of the European Commission, standard contractual clauses approved by the European Commission or other legal instruments.

- Judicial authorities, the Revenue Agency, social security institutions, administrative and sectoral authorities, as well as those entities to whom communication is mandatory by law.

These subjects will process the data in their capacity as independent data controllers. Companies of the Banco BPM Group or subsidiaries or similar entities and external collaborators assigned to services and offices involved in managing relations with shareholders, including administrative and control bodies as well as internal or external structures that perform technical, support (in particular legal, IT, etc.) and corporate control tasks for the Bank.

For the pursuit of the aforementioned Purposes, the Bank may communicate your data to certain parties, including foreign parties, belonging to certain categories so that they may carry out the related processing and communications.

The parties belonging to these categories may process your data as independent data controllers, external data processors or joint data controllers.

The Bank does not disclose your personal data.



YOUR RIGHTS

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

- obtain confirmation of the existence or otherwise of personal data concerning you and a copy thereof in an intelligible form;
- obtain the updating, rectification or integration of your data;
- request the deletion of your data, within the terms permitted by law;
- object, in whole or in part, to the processing of personal data concerning you;
- restrict the processing, in the event of a breach, 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 by the Data Controller to express your opinion and contest the decision.

Finally, if you deem it appropriate, you may lodge a complaint with the Data Protection Authority, which is competent in the manner and forms provided for by law. For further information, please consult the Authority's website at www.garanteprivacy.it.

To this end, the Bank has provided a specific section (Privacy area) on its website where you can submit your requests free of charge. You can download the form and send it, once completed, by email to protezionedati@bancobpm.it, by certified email to protezionedati@pec.bancobpm.it, or by post to the Bank's registered office at Piazza F. Meda n. 4, 2 0121 Milan, for the attention of the Data Protection Officer.

Please note that the Bank undertakes to respond to your requests within one month, except in particularly complex cases, which may take up to 3 months. In any case, the Bank will explain the reason for the delay within one month of your request.

The outcome of your request will be provided to you in writing or electronically. If you request rectification, erasure or restriction of processing, the Bank undertakes to communicate the outcome of your requests 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, excessive, or repetitive in nature. In this regard, the Bank has established a register to track your requests.