

PRIVACY NOTICE

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (GDPR)

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I. Data Controller and Data Protection Officer (DPO)

The Data Controller is Banca Sistema S.p.A., with its registered office at Largo Augusto 1/a, corner of Via Verziere 13, 20122 Milan.
The Data Controller to whom the data subject may address requests for the exercise of the rights referred to in Section IV below is:
Banca Sistema S.p.A.
Largo Augusto 1/A, corner of Via Verziere 13 – 20122 Milan
Tel. +39 02 802801
Fax +39 02 72093979
Email: compliance&antiriciclaggio@bancasistema.it

The Controller has appointed a Data Protection Officer ("DPO"), whom you may contact to exercise your rights, as well as to obtain any information relating to those rights and/or to this Privacy Notice, by writing to: privacy@bancasistema.it
The Controller and the DPO, also through the designated departments, will take charge of your request and provide you, without undue delay and in any case no later than one month from its receipt, with information on the action taken in response to your request.

Please note that if the Controller has reasonable doubts regarding the identity of the individual submitting the request, additional information may be requested as necessary to confirm the data subject's identity.

II. Categories of Data

For the performance of its activities, the Bank processes different types of data:

- **Special categories of data** (e.g., medical and injury certificates; pregnancy certificates; membership in so called protected categories; results of medical examinations required by law or by contract; public positions held, etc.) may be processed by the Company in compliance with applicable laws and may be disclosed to Social Security and Welfare Institutions or to the Labour Consultant, who process them exclusively for contractual, welfare, social security, and accounting purposes, and in any case in compliance with the provisions set out in the Authorisations issued by the Italian Data Protection Authority, as amended from time to time.
- **Judicial data** (e.g., verification of professionalism, independence and integrity requirements, and the absence of grounds for ineligibility, incompatibility, or disqualification) are collected and stored in full compliance with the provisions set out in the Authorisations issued by the Italian Data Protection Authority, as amended from time to time.
- **Ordinary personal data** held by the Company are collected directly from the data subject and may, in some cases, come from third parties, registers, or public lists. The Company may also obtain personal data when fulfilling specific obligations related to the management of the employment relationship, such as accounting, remuneration, social security, welfare, and tax obligations.

Processing, exclusively for the purposes mentioned above, is carried out either manually or through electronic or automated means, in all cases using methods that ensure data confidentiality and security, including the integrity and availability of the data.

III. Purposes, Methods of Processing, and Legal Basis

Processing is carried out exclusively to enable Banca Sistema to perform the activities connected with the appointment as a member of:

- the Board of Directors or its Internal Committees;
- the Board of Statutory Auditors;
- the Supervisory Body (OdV) at Banca Sistema or at other companies within the Group.

In particular, processing relates to the following purposes:

- Compliance with legal obligations, regulations, or other national or EU regulatory provisions, or with instructions issued by authorised Authorities and/or in response to requests from supervisory and control Authorities. These include, for example, verification of professionalism, independence and integrity requirements, and the absence of grounds for ineligibility, incompatibility, or disqualification under applicable law.
The legal basis for processing is the fulfilment of legal and/or regulatory obligations pursuant to Article 6(1)(c) GDPR for ordinary personal data. About the processing of judicial data, the legal basis lies in Article 10 GDPR and Article 2-octies of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

- Special categories of data, where processed, will be handled in accordance with Article 9(2)(b) GDPR.

Management of the contract with the Bank, including administrative management of data, accounting entries, and related record-keeping. The legal basis for processing is the fulfilment of pre-contractual and contractual obligations under Article 6(1)(b) GDPR. The provision of Individual Data or, where applicable, Family Members' Data may be:

- strictly necessary for the assumption of the position as a member of (i) the Board of Directors or its Internal Committees, (ii) the Board of Statutory Auditors, or (iii) the Supervisory Body of the Company or any other Group company;
- mandatory pursuant to laws, regulations, or other national or EU regulatory provisions, or based on instructions issued by authorised Authorities and/or in compliance with requests from supervisory and control Authorities.

Any refusal by the data subject to provide Personal Data in the cases described above may result in Banca Sistema and/or any other Group company in which the data subject holds a position being unable to meet the regulatory requirements associated with such position.

Banca Sistema therefore informs you and your family members that the personal data of your family members may be processed, where required under national or European legislation. You are kindly requested to provide this notice to the family members concerned so that they may be properly informed about the processing of their personal data. In any case, neither your consent nor theirs is required by law.

IV. Disclosure of Data

The performance of processing activities requires that data may be disclosed to specific entities acting as Data Processors, Persons Authorised to Process Data, or Data Controllers. These entities may be internal to the company, such as employees or collaborators, or external organisations and companies. Finally, data may be transferred and processed, in compliance with applicable legislation, by entities located in countries within the European Union.

Disclosures to external companies are carried out for the purposes described above (therefore connected to contractual purposes or legal obligations) and concern the following processing activities:

- Management of alarm systems, provision of meal vouchers where applicable, professional training, staff instruction, etc.;
- Accounting management of the data subject's position and supplementary welfare and insurance schemes;
- Activities connected with car rental, provision of mobile phones and telephone cards, motorway subscription services or prepaid toll cards, etc.

The entities within these categories to whom data may be disclosed will process such information as independent Data Controllers or as Data Processors pursuant to the law, within the scope of the contractual relationship in place. Furthermore, individuals belonging to the following categories may become aware of the data, in their capacity as authorised persons, and solely in relation to the data necessary for the performance of their assigned duties: employees of the Bank or seconded to it; temporary agency workers; interns engaged by the Bank.

V. Data Subject Rights under Articles 15 et seq. of the GDPR

In relation to the processing activities described in this notice and pursuant to Articles 13(2)(b) and (d), 15, 16, 17, 18, 19, 20 and 21 of the EU Regulation, you, as the data subject, may exercise the following rights:

- Right of access, meaning the right to request from the Data Controller access to your personal data and information regarding the processing carried out on such data;
- Right to rectification, anonymisation or erasure of data in the circumstances set out in Article 17 of the Regulation and in compliance with any other retention obligations applicable to the Controller;
- Right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- Right to restriction of processing in cases where: the data subject contests the accuracy of the personal data, for the period necessary for the Controller to verify such accuracy; the processing is unlawful and the data subject opposes the erasure of the personal data and requests that their use be restricted instead; the personal data are required by the data subject for the establishment, exercise or defence of legal claims; the data subject has objected to the processing pursuant to Article 21 GDPR, pending verification of whether the legitimate grounds of the Controller override those of the data subject;
- Right to data portability, i.e., the right to receive the personal data concerning you in a structured, commonly used and machine-readable format, and the right to transmit those data to another Data Controller without hindrance from the Controller to whom they were provided, where the processing is based on consent or on a contract and is carried out by automated means;
- Right to object, meaning the right for the data subject to object at any time to the processing of personal data concerning them where such processing is carried out for the pursuit of the Controller's legitimate interest, by submitting the objection to the DPO. The Controller shall refrain from further processing the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims;
- Right to object to direct marketing, meaning the right of the data subject to object at any time to the processing of personal data for direct marketing purposes based on the Controller's legitimate interest, by submitting the objection to the DPO. The Controller shall refrain from further processing the personal data for such purpose;
- Right to lodge a complaint with the Italian Data Protection Authority if the data subject believes their rights have not been respected;
- Right, in the case of automated decision-making, to obtain information about the logic involved in such processing, as well as the right to request human intervention by the Controller and to express their opinion or contest the decision.

Any rectification, erasure or restriction of processing carried out at the request of the data subject shall be communicated by the Data Controller to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject of such recipients if the data subject so requests.

To exercise the aforementioned rights or for communications, you may contact: Banca Sistema S.p.A., Largo Augusto 1/a, corner of Via Verziere 13 – 20122 Milan (Tel. +39 02 802801m Fax +39 02 72093979, Email: compliance&antiriciclaggio@bancasistema.it) and the DPO (see Section I).

VI. Data Retention Periods

The personal data processed by Banca Sistema are retained for the period necessary to achieve the purposes specified in the privacy notices applicable to the various categories of data subjects, after which they are deleted in accordance with legal requirements.

In particular, if the relationship between Banca Sistema and the director comes to an end, the personal data will be retained from the date of the event for the period required to comply with legal obligations regarding the retention of accounting records, as well as for any additional retention needs related to judicial requirements, tax audits, or obligations arising from anti-money laundering regulations.

VII. Transfer of Personal Data to Third Countries

Personal data are not transferred outside the European Union. However, should such a transfer become necessary, we may transfer personal data to non EEA countries, ensuring from the outset that any transfer will be carried out in compliance with applicable legal provisions:

- for international transfers of personal data originating from the European Economic Area (EEA) to a non EEA country, the transfer may take place if the European Commission has recognised that the non EEA country provides an adequate level of data protection; in such cases, your personal data may be transferred on this basis;
- for transfers to non EEA countries whose level of protection has not been recognised as adequate by the European Commission, we may rely on an applicable derogation for the specific situation and/or adopt the Standard Contractual Clauses issued by the European Commission for the transfer of personal data outside the EU.