

INFORMATION NOTICE GOVERNING THE PROCESSING OF PERSONAL DATA
Articles 13 and 14 of Regulation (UE) 2016/679

This is to inform you that the personal data you will provide as a Client of the Bank will be processed in accordance with Regulation EU 2016/679 (hereinafter referred to as the “GDPR”).

1. Data controller and Data Protection Officer (DPO)

The Data Controller is Credito Lombardo Veneto S.p.A. (“Bank” or “Controller”), CF/P.IVA 03515830168, having its registered office in via Orzinuovi n. 75, 25125 Brescia (BS).

In order to exercise your rights, listed in par. 7, you can contact the Controller writing to:

- Credito Lombardo Veneto S.p.a., via Orzinuovi 75, 25125 Brescia (BS) – To the attention of ‘Referente Privacy’
- writing an e-mail to: privacy@crelove.it;
- writing a PEC to referenteprivacy@cert.crelove.it

The Controller designated a Data Protection Officer (“DPO”) available for the exercise of your requests and rights writing at:

- BDO Advisory Service S.r.l., Viale Abruzzi n. 94 Milano (20131) – To the attention of Data Protection Office
- writing an e-mail to: dpo@crelove.it privacy@crelove.it;
- writing a PEC to dpo@crelove.it

2. Categories of personal data processed

2.1 Data collected from the data subject

For the purposes of the processing listed in this information notice, the Controller may process strictly necessary personal data referred to you or other people (familiar, guarantors, beneficiaries, delegates, etc.) such as, for example, contact data (name, surname, address, mobile number, e-mail), payment data and economic data or vocal recordings.

The Bank may obtain, occasionally, special categories of personal data collected from the data subject during payment transactions (es. payment of membership fees to a political or trade union organisation, purchases of goods or services made with credit/debit cards from which special categories of data is obtained).

The provision of data is mandatory, failure to provide will prevent the Bank from concluding the contract or fulfilling what you requested.

2.2 Personal data not obtained from the data subject

For the purposes of the processing listed in this information notice the Controller may process personal data collected from other sources such as, for example:

- common and/or financial data in publications/databases made available by official authorities, or by third parties, such as the Official Journal of the Italian Republic, the Commercial and Company Register, data banks managed by financial supervisory authorities or credit reference agencies;
- common and financial data from third party databases used for legal requirements;
- data relating to criminal offences and/or criminal convictions on orders issued by the judicial authority, provided by agencies or published in the press, to comply with legal obligations as better specified in point 3.2 (e.g. anti money laundering, anti-terrorism and embargoes, etc.);

3. Purposes of the processing

3.1 Performance of contracts

The processing of your personal data, directly provided or obtained from external sources, is necessary for the acquisition of information prior to the conclusion of contracts, for the management of the pre-contractual phase, for the subsequent execution of the contract.

In addition, your personal data will be processed for all the requirements related to the provision of payment services and payment transactions authorized by you as a payer or payee and/ or also in cases of services related to the confirmation of availability of funds, access in the case of payment order services and/ or information access and use in the case of account information services.

Lawfulness of processing: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

3.2 Compliance with legal obligations

The processing of your personal data by the Bank may also be linked to (i) compliance with obligations under national and European laws (such as, for example, anti-money laundering legislation, tax legislation, etc.), by the instructions of supervisory and control bodies or other authorities entitled to do so, as well as (ii) compliance with the rules on monitoring and uniform classification of operational and credit risks.

Lawfulness of processing: processing is necessary for compliance with a legal obligation to which the controller is subject

3.3 Marketing activities for Bank's products

With your consent, the Bank may process your personal data for the purpose of sending you commercial, promotional and advertising communications of products and services of the Bank (direct marketing), as well as direct sales and market research. For these purposes the Data Controller will use automated methods of contact (such as, for example, electronic mail, telefax, SMS, MMS, instant messaging, apps, automated call systems without the intervention of an operator, etc.) and/or traditional methods (such as telephone calls with operator and paper mail).

Lawfulness of processing: consent

3.4 Marketing activities for third parties' products

The Data Controller may send you commercial communications of products and services offered by subsidiaries, parent companies or related companies to the Bank and/or third party companies, for marketing activities and marketing of such products or services. The processing involves surveys and market research and/or commercial communications related to products and services of third parties through the use of tools such as electronic mail, telefax, SMS, MMS, instant messaging, applications, automated call systems without operator intervention, etc.) and/or traditional methods (such as, for example, telephone calls with operator and paper mail) considered the limits provided by the regulations in force on telemarketing and opposition register.

Lawfulness of processing: consent

3.5 Profiling

The Data Controller may process your personal data, consumption habits, preferences, behaviors and aspects related to your financial situation in automated ways, to identify and offer the services or products most appropriate to your personal needs.

Lawfulness of processing: consent

3.6 Transfer of your personal data to third parties for marketing purposes

The Bank may transfer your personal data to other third parties, including marketing companies, market research companies and consulting companies for their own marketing purposes, which will process your personal data as independent owners ("third party assignees"), providing you with appropriate information on the respective processing. In any event, you may exercise your rights against the Third Party Assignees as listed in paragraph 6 below.

Lawfulness of processing: consent

3.7 Reporting and internal management purposes

The Bank also intends to process your data for:

- a. the detection of the customer's satisfaction on the quality of services and the analysis of the performance of Commercial campaigns;
- b. fraud and money laundering prevention, credit risk profiling, IT management and security, including through the enrichment of personal data provided and generated by the execution from external sources, to the extent permitted by law of the relationship for purposes strictly related to the contract concluded or legal obligations;
- c. verification of the existence of prejudicial elements to the establishment/adjustment of the relationship of the applicant customer and/or the guarantor, necessary to initiate and deepen the application and credit investigation as well as for the successive stages;
- d. Checking the credit exposures of customers and their contact, aimed at preventing possible defaults, perhaps not related to financial difficulties;
- e. image and video acquisition related to the video surveillance system for security purposes;
- f. the monitoring of the use of the services made available to you in execution of the contracts concluded (for example, the execution of transactions, audits and assessments on findings and progress of reports and the related risks).
- g. the possible management of judicial and/or extrajudicial litigation (for example, but not limited to: the challenges and the activities related to the enforcement of the debt) as well as the transfer and securitisation of credit claims.

Lawfulness of processing: Legitimate interests

4. Data retention

Personal Data will be kept only for the time necessary to fulfil each purpose. In order to comply with legal obligations, your personal data, including those relating to relations not completed or refused, will be kept for 10 years from the date of termination of the contract, or, if later, from the date of a binding decision by an authority competent to that effect (for example, court judgment).

For the opening of a relationship, as a potential new customer, we will keep the personal data you provided for 12 months after the end of the investigation; Storage could be extended in the case of legal requirements imposing it or for the exercise of the right of defence.

For purposes other than marketing, where the consent of the data subject is required, the Personal Data are processed until the revocation of the individual consent or termination of the relationship; for marketing purposes, your personal data are processed used until withdrawal of consent or for 12 months after termination of the relationship or from the last contact with the Bank.

For profiling for marketing purposes the Bank process personal data collected within the last 12 months; the data sets generated by profiling processing are then used for a further 12 months from their creation.

5. Data processing methods

The processing of your personal data will take place, in compliance with the provisions of the GDPR, by paper, computer and telematic tools, with logic strictly related to the purposes foreseen and, in any case, to guarantee security and confidentiality.

6. Data Recipients

For the pursuit of the purposes described in point 3 above, your personal data may be disclosed to the Bank's employees, assimilated personnel, collaborators and agents who will act as authorised person and/or processors and/or data controllers.

The Data Controller may also need to disclose your personal data to third parties (also based outside the European Union, in compliance with the legal requirements that allow it) belonging, by way of example, to the following categories:

- a) subjects that provide support services for the execution of the instructions given by you and for the management of services of payment, debit and credit cards, debt collectors and treasurers;
- b) parties that perform activities of issuing, offering, placing, trading, custody of banking, financial and insurance products and/or services banking, financial and insurance products and/or services;
- c) entities that support the activities of credit investigation, evaluation, disbursement, collection and insurance as well as guarantee consortia and affiliated institutions
- (d) subjects who handle the enveloping, mailing and archiving of documents relating to customers in both paper and electronic form;
- e) other parties which the Bank uses for various reasons to supply the product or service requested;
- f) parties twhich provide services for the management of the Bank's IT system;

- g) entities that manage debt collection or provide professional tax advice and assistance services, legal and judicial assistance, financial intermediaries and property appraisal services;
- h) entities that audit and certify financial statements;
- i) supervisory and control authorities and bodies and, in general, public or private entities with a public function;
- j) third parties acting as providers of payment order disposition services or account account information services;
- k) companies that offer services for detecting the quality of services, market research, information and commercial promotion commercial promotion of products and/or services;
- l) entities operating national and international systems for the prevention of insolvency risk and for the control of fraud against banks and financial intermediaries;
- m) repositories established at the Ministry of Economy and Finance (hereinafter MEF), pursuant to Articles 30-ter, paragraphs 7 and 7-bis, and 30-quinquies, of Legislative Decree no. 141 of 13 August 2010, exclusively for the purposes of preventing identity theft. The results of the procedure for checking the authenticity of the data will not be disseminated, but may be communicated to the Authorities and Supervisory and Control Bodies;
- n) Consorzio Corporate Banking Interbancario (CBI) and the entities that are members of it and/or that provide services related to it connected to it, including the 'Check IBAN' service (for a complete list of the entities involved in this latter service, please visit the web page <https://www.cbiglobe.com/Il-servizio/Check-IBAN>);
- o) in order to carry out international financial transactions and certain specific domestic transactions requested by customers it is necessary to use the international messaging service operated by SWIFT (Society for Worldwide Interbank Financial Telecommunication), which temporarily stores in copy all the data required for the execution of transactions (e.g. name of originator, beneficiary, bank details, amount, etc.).
It is not possible to carry out the aforementioned transactions requested by customers without using this interbank network and without communicating the aforementioned data to it. These personal data are stored on a company server located in the United States. This site may be accessed by the competent US authorities (in particular, the Department of the Treasury) for counter-terrorism purposes (for information on data protection: <http://www.swift.com>);
- (p) companies providing surveillance/ video surveillance services.

The complete and up-to-date list of subjects to whom your personal data may be disclosed can be obtained from the Controller's registered office.

The Bank, in order to perform operations or specific services requested, may transfer the Customer's personal data to recipients that may be located outside the European Economic Area, ensuring an adequate degree of protection of personal data in accordance with current legislation.

To obtain a copy of the safeguard please contact the Controller (see Par. 1).

7. Data subject right

You have the right to ask the Data Controller at any time to exercise your rights under Article 15 et seq. of the GDPR.

Notably, you have the right to:

- **right of access** – the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data;
- **right to rectification** – the right to obtain from the controller without undue delay the rectification of inaccurate personal data;
- **right to erasure** – right to obtain from the controller the erasure of personal data concerning him or her without undue delay. The right to erasure does not apply insofar as the processing is necessary for the fulfilment of a legal obligation or the performance of a task carried out in the public interest or for the establishment, exercise or defence of legal claims;
- **right to restriction of processing** – right to obtain from the controller restriction of processing;
- **right to data portability** – right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller;
- **right to object** – right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her;
- **right not to be subject to a decision based solely on automated processing** – right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her;
- **right to lodge a complaint** with a supervisory authority;
- **right to withdraw consent** at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

The above mentioned rights may be exercised vis-à-vis the Data Controller by contacting the references indicated in point 1.
In relation to any subsequent amendments or additions that may become necessary as a result of regulatory or corporate developments, you may find the latest updated version of the information notice available on the website www.crelove.it/privacy at any time.

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