

**NOTICE FOR MEMBERS OF CORPORATE BODIES PURSUANT TO  
ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679****INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA**

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**I. Data Controller and Data Protection Officer (DPO)**

The 'Data Controller' of the processing is Banca Sistema S.p.A., registered office Largo Augusto, 1/a ang. via Verziere, 13 - 20122 Milan, the Data Processor to whom the data subject may refer to exercise the rights referred to in point IV below is

Banca Sistema S.p.A.  
Largo Augusto 1/A, corner via Verziere 13 - 20122 Milan  
Tel. +39 02 802801  
Fax. +39 02 72093979  
E-mail address: [compliance&antiriciclaggio@bancasistema.it](mailto:compliance&antiriciclaggio@bancasistema.it)

The Data Controller has appointed a Data Protection Officer ('DPO'), whom you may contact in order to exercise your rights, as well as to receive any information relating to the same and/or to this Policy, by writing to: [privacy@bancasistema.it](mailto:privacy@bancasistema.it)

The Data Controller and the DPO, also through the designated structures, shall take care of your request and provide you, without undue delay and in any case, at the latest, within one month from the receipt thereof, with the information concerning the action taken with regard to your request.

We inform you that if the Data Controller has doubts as to the identity of the natural person making the request, it may request further information necessary to confirm the identity of the person concerned.

**II. Purposes and methods of the processing intended for the data**

The processing is aimed exclusively at enabling Banca Sistema to carry out the activities resulting from the appointment as member

- I. of the Board of Directors or its Internal Committees
- II. of the Board of Statutory Auditors;
- III. the Supervisory Board or any other company belonging to the Banca Sistema Group.

In particular, the processing relates to the following purposes:

- fulfilment of legal obligations, regulations or other national or EU regulatory provisions, or as a result of provisions issued by Authorities empowered to do so and/or in compliance with requests by supervisory and control Authorities such as, for example, verification of the requirements of professionalism, independence and honourableness and of the absence of causes of ineligibility, incompatibility and disqualification provided for by current regulations
- management of the contract with the Bank and therefore the administrative management of data, including accounting entries and records.

The provision of Individual Data or, if due, of Family Members' Data, may be

- (a) strictly necessary for taking office as a member of (i) the Board of Directors or its Internal Committees, (ii) the Board of Statutory Auditors, (iii) the Supervisory Board of the Company itself or of any other company belonging to the Banca Sistema Group;
- (b) compulsory under national or EU laws, regulations or other provisions, or as a result of provisions issued by Authorities empowered to do so and/or in compliance with requests by Supervisory and Control Authorities.

Any refusal on the part of the data subject to provide Personal Data in the cases referred to in the preceding letters may make it impossible for Banca Sistema and/or any other company belonging to the Banca Sistema Group in which the data subject holds an office, to comply with the regulatory requirements relating to such office.

Banca Sistema therefore informs you and your family members of the fact that your personal data may be processed if required by national or European legislation.

Please also present this notice to your family members so that they can be properly informed about the processing of their data. In any case, your or their consent is not required by law.

**III. Communication of data**

The performance of processing operations requires that the data may be communicated to certain persons acting as Data Processors, Persons in Charge or Data Holders. Such persons may be internal to the company, such as staff or collaborators, or external entities and companies. Finally, the data may be transmitted and processed in accordance with current legislation to entities established in countries within the European Union.

Communications made to external companies are carried out for the purposes illustrated (therefore linked to contractual purposes or legal obligations) concerning the following processing:

- Management of alarm systems, possible disbursement of meal vouchers, professional training, training etc.;
- Accounting management of the data subject's position and supplementary insurance forms of social security and assistance;
- Car rental, provision of mobile phones and telephone cards; subscriptions or prepaid cards of motorway companies, etc.

Subjects belonging to the categories to which the data may be disclosed will process such information as autonomous data controllers or data processors within the scope of the existing contractual relationship. Individuals belonging to the following categories may also become aware of the data in their capacity as appointees, with regard to the data necessary for the performance of the tasks assigned to them: workers employed by the Bank or seconded to it; temporary workers; trainees employed by the Bank.

#### **IV. Rights of the data subject under Art. 15 et seq. of the GDPR**

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

- right of access, i.e. to request from the Data Controller access to the personal data concerning you and information about the processing carried out on them;
- the right to rectification, anonymization or erasure of data in the cases referred to in Art. 17 of the Regulation and compatibly with other obligations of retention by the Controller
- right to revoke previously given consent at any time, without prejudice to the lawfulness of the processing based on the consent prior to revocation;
- right to restrict processing in cases where: 1) the data subject contests the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such data; 2) the processing is unlawful and the data subject objects to the deletion of the personal data and requests instead that their use be restricted; 3) the personal data are necessary for the data subject to establish, exercise or defend a right in court; 4) the data subject has objected to the processing pursuant to Art. 21 GDPR, during the period pending verification as to whether any legitimate reasons of the data controller prevail over those of the data subject;
- right to data portability, i.e. the right to receive in a structured, commonly used and machine-readable format personal data concerning him or her, and the right to transmit such data to another Data Controller without hindrance from the Data Controller to whom he or she has provided them, where the processing is based on consent or on a contract, and is carried out by automated means;
- right to object, the data subject has the right to object, at any time, to the processing of personal data concerning him/her where the processing is carried out in pursuit of the legitimate interests of the Data Controller, by lodging the objection with the DPO. The Controller shall refrain from further processing personal data unless it can demonstrate the existence of compelling legitimate grounds for processing which override the data subject's rights, or for the establishment, exercise or defence of a legal claim;
- right to object to direct marketing, the data subject has in particular the right to object, at any time, to the processing of personal data for direct marketing purposes based on the legitimate interest of the Data Controller, by submitting the objection to the DPO. The Controller shall refrain from further processing personal data for the related purpose.
- the right to lodge a complaint with the Data Protection Authority if he/she considers that his/her rights have not been respected;
- to obtain, in the event of automated decision-making, information on the logic of the processing in question, as well as to request human intervention on the part of the Data Controller, and to be able to express his/her opinion or contest the processing.

Any rectification or erasure or restriction of processing carried out at the request of the data subject - unless this proves impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data have been transmitted. The Data Controller may communicate these recipients to the data subject if the data subject so requests.

To exercise the aforementioned rights and communication, please contact Banca Sistema S.p.A., Largo Augusto, 1/a ang. via Verziere, 13 - 20122 Milan (Tel. +39 02 802801, Fax. +39 02 72093979, e-mail: [compliance&antiriciclaggio@bancasistema.it](mailto:compliance&antiriciclaggio@bancasistema.it)) and to the DPO (see point I).

#### **V. Data retention periods**

Personal data processed by Banca Sistema are kept for the time necessary to achieve the purposes specified in the information notices for the various categories of subjects, after which they are deleted in accordance with legal requirements.

In particular, in the event of termination of the relationship between Banca Sistema and the administrator, personal data shall be retained from the date of the event for the purpose of fulfilling the legal provisions on the retention of accounting records, in addition to any requests for further retention for judicial requirements, tax audits or due to anti-money laundering requirements.