

CUSTOMER INFORMATION AS REQUIRED BY ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

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I. Data Controller

The "Data Controller" is ProntoPegno S.p.A., registered office in Largo Augusto 1/A, angolo via Verziere 13 - 20122 Milan. The address the data subject may contact to exercise his/her rights under point V., is:

Pronto Pegno S.p.A.
Largo Augusto 1/A, angolo via Verziere 13 - 20122 Milan
Tel. +39 02 80280600
Fax. +39 02 72093979
E-mail address: compliance&antiriciclaggio@prontopegno.it

The Data Controller has appointed a Data Protection Officer ("DPO"), whom you may contact to exercise your rights, as well as to receive any information relating to them and/or this document, by writing to privacy@prontopegno.it.

The Data Controller and the DPO shall handle your request, also through designated functions, and shall provide you, without undue delay and in any event within one month of receipt of the request, with the information on action taken in relation to your request.

We inform you that where the Data Controller has doubts concerning the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the data subject.

II. How and why the data are used

ProntoPegno S.p.A. (the "Company") informs you that the personal data it holds, which have been taken directly from the data subject, may be processed, also by Companies of the Banca Sistema Group or third-party entities for the following purposes:

1. Purposes closely related to the management of customer relations in the context of activities conducted according to the Company's Articles of Association, and by law (e.g. by acquiring pre-contractual information, executing transactions on the basis of obligations deriving from a contract with the customer, evaluations and assessments of accounts, and the related risks). The provision of personal data for the above purposes **is not mandatory**, but refusal to provide them may, depending on the relationship between the data and the requested service, mean that the Company is unable to provide the service. Processing of the above data **does not require the consent** of the data subject.
2. Compliance with the obligations of laws, regulations, EU directives or instructions given by the competent authorities, supervisory and control bodies (such as the obligations under anti-money laundering legislation). The provision of personal data for the above purposes is obligatory and the consent of the data subject is not required for them to be processed.
3. Purposes functional to the Company's activities, such as: **a)** Recording the level of customer satisfaction with the Company's services, by personal or telephone interviews, questionnaires etc.; **b)** Promotion and sale of products and services of the Company, of companies of the Banca Sistema Group or third-party entities, including the organisation of events, also through automated systems (SMS, MMS, fax and e-mail) also by third-party entities; **c)** Disclosure or transfer of data to third parties for market surveys and/or marketing purposes by sending promotional and commercial communications with traditional (such as telephone calls with an operator and traditional mail) and/or automated methods of contact (such as fax, SMS, MMS and e-mail). The provision of personal data for the above purposes is optional and the **consent of the data subject is required**. The absence of consent will have no impact whatsoever on the relations between the parties as the consent can only lead to an improvement in the service. The consent may be withdrawn at any time by notifying the Data Controller.

The data will be processed manually, digitally and electronically using methods strictly related to the above purposes and in any event in a way that guarantees the confidentiality and security of the data.

III. Categorie di dati personali

Fra i dati personali che la Società tratta rientrano, a titolo esemplificativo, i dati anagrafici, i dati acquisiti dalle disposizioni di pagamento, quelli derivanti dall'installazione e dall'utilizzo dell' APP della Società. Il Titolare non tratta categorie particolari di Suoi dati personali.

IV. Persons who may receive the data or who may become aware of them as data processors or persons in charge of data processing

In connection with its activities, the Company may provide your data to:

- Parties identified by law (e.g. for purposes linked to the administration and assessment of taxes, tax disputes and tax collection: the Revenue Agency; for purposes related to the administration of justice: the judicial authorities; for purposes related to the exercise of supervisory, control and other functions specifically indicated by law: the Bank of Italy);
- Central Credit Register - the information system managed by the Bank of Italy in relation to customer credit ratings and credit risk analysis and management;
- companies in the Banca Sistema banking group, and its subsidiaries and associates, also with regard to the anti-money laundering/anti-terrorism obligations pursuant to Articles 35 and 36 of Legislative Decree no. 231 of 21 November 2007, as amended (disclosure to intermediaries belonging to the Banca Sistema banking group, even if located in third countries, is permitted on condition that they apply equivalent measures);
- parties whose products and services are offered by the Company;
- parties providing services related to management of the Company's information system and IT programmes;
- providers of customer correspondence services (e.g. enveloping, email management);
- providers of document archiving services;
- providers of customer assistance services (e.g. by telephone);
- parties involved in the management of payment and online collection and cash flow management services;
- operators of national and international fraud control and prevention systems;
- parties working to investigate and fight international terrorism;
- debt recovery agents;
- consultants;
- providers of market research and market survey services or service quality surveys, or parties involved in the promotion of products offered by the Company or by third parties;
- parties carrying out searches - e.g. to verify adverse entries (legal charges, sale, etc.) against the customer on official registers, Companies Registers, or Court registers (to verify whether or not there are any insolvency proceedings in progress);
- parties who control, review and certify the operations carried out by the Company, also in the interests of customers;

- vendors of a company, a business unit, legal relations sold en bloc or individually (e.g. the assignment of receivables);
- entities resulting from the conversion, merger or demerger of the Company.

Parties in the categories reported above eligible to receive personal data will handle them as Data Controllers or Data Processors (as defined by law) within the scope of the existing contractual relationship. A list of such companies can be obtained from branches of the Company open to the public, or on the website www.prontopegno.it. The following categories may also receive the information, in their capacity as persons in charge of data processing as necessary to fulfil their duties: employees of the Company or of the companies of the Banca Sistema Group on secondment with the Company, temporary staff, trainees and employees of the external companies used by the Company.

V. Rights of the data subject under Articles 15 and following of the GDPR

The exercise of the rights indicated in this section is not subject to any form of restriction and is free of charge, unless it is manifestly unfounded or excessive within the meaning of Article 12(5) of the EU Regulation. The Data Controller shall be obliged to provide information on action taken by the data subject without undue delay and within one month of receipt of the request. Extensions are permitted under Article 12(3) of the EU Regulation. In relation to the processing described in this information notice and in accordance with Articles 13(2) (b) and (d), 15, 16, 17, 18, 19, 20, and 21 of the EU Regulation, you may exercise the following rights as the data subject:

- **right of access**, i.e. right to request the Data Controller for access to personal data concerning you and information about the processing of that data;
- **right to rectification, anonymisation or erasure** of the data in the circumstances envisaged in Article 17 of the Regulation and in compliance with the Data Controller's other retention obligations;
- **right to withdraw** the prior consent at any time, without affecting the lawfulness of processing based on the consent before its withdrawal;
- **right to restriction** of processing in cases where: 1) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; 2) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; 3) the personal data are required by the data subject for the establishment, exercise or defence of legal claims; 4) the data subject has objected to processing pursuant to Article 21 of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject;
- **right to data portability**, namely that the data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided, where the processing is based on consent or a contract, and is carried out by automated means;
- **right to object**, the data subject shall have the right to object at any time to processing of personal data concerning him or her when the processing is carried out for the pursuit of the legitimate interest of the Data Controller, by submitting the objection to the DPO. The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the rights of the data subject or for the establishment, exercise or defence of legal claims;
- **right to object to direct marketing**, the data subject shall have the right to object at any time to processing of personal data for direct marketing purposes founded on the legitimate interest of the Data Controller, by submitting the objection to the DPO. The Data Controller shall no longer process the personal data for related purposes;
- **right to lodge a complaint** with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if the data subject believes that his or her rights have not been respected;
- right to obtain, in the case of an automated decision-making process, information on the logic involved in the processing in question, and to request human intervention by the Data Controller, and to be able to express his or her opinion or contest the processing.

Any rectification or erasure of personal data or restriction of processing carried out upon request from the data subject - unless it proves impossible or involves disproportionate effort - shall be notified by the Data Controller to each recipient to whom the personal data have been disclosed. The Data Controller may inform the data subject about those recipients if the data subject requests it.

To exercise the above-mentioned rights and communication you can contact: ProntoPegno S.p.A., Largo Augusto 1/A, angolo via Verziere 13 (Tel. +39 02 802801, Fax. +39 02 72093979, e-mail: compliance&antiriciclaggio@prontopegno.it) and the DPO (see point I).

VI. Processing methods and Data storage times

Your Personal Data will be processed manually, digitally and electronically and in any event in a way that guarantees the confidentiality and security of the data. The personal data processed by ProntoPegno are stored for the time necessary to manage the existing relationship and in compliance with the legal obligations provided for by the regulations. In particular, in the event of termination of the relationship with customers, the personal data will be stored from the date of termination of the relationship, for a period of approximately 10 years, in order to comply with the legal provisions on the storage of accounting records. The personal data may be processed for a longer period for judicial purposes, tax audits or for compliance with anti-money laundering legislation.

CONSENT TO THE PROCESSING AND DISCLOSURE OF PERSONAL DATA PURSUANT TO ARTICLE 7 OF REGULATION (EU) 2016/679

In consideration of the Information Notice provided to me pursuant to Articles 13 and 14 of the Regulation, I hereby acknowledge the processing of my Personal Data for the purposes described in the Information Notice, under points 1) and 2) of Section II "How and why the data are used".

Tick the boxes below to freely decide to give or refuse your consent to the Company for the use of your data for activities that are not strictly related to the services you requested, but that are useful to improve such services and to learn about the new services offered by the Company and other companies. The consent can be freely withdrawn according to the procedures set out in the Information Notice given.

In particolare, Lei può consentire alla Società di utilizzare i Suoi dati per:

- Disclose them to companies that record the quality of the services and the needs of customers on our behalf

I give my consent

I refuse to give my consent

- Promotion and sale of products and services of the Company and of companies of the Banca Sistema Group, including the organisation of events, also through automated systems (SMS, MMS, fax and e-mail)

I give my consent

I refuse to give my consent

- Promotion and sale of products and services of other companies, also through automated systems (SMS, MMS, fax and e-mail)

I give my consent

I refuse to give my consent

- Disclosure by the Company to third-party entities regarding commercial information, market research, or direct offers of their products and services

I give my consent

I refuse to give my consent

.....
(place and date)

.....
(signature of the legal representative/attorney)

Space reserved for the Company

Management Control - Customer's details - PLEASE WRITE THE CUSTOMER'S NAME AND SURNAME IN CAPITAL LETTERS