



## Client information notice pursuant to articles 13 and 14 of Regulation EU 2016/679 and the existing national regulation on personal data protection

Pursuant to Regulation EU 2016/679, the General Data Protection Regulation (the "GDPR" or "GDP Regulation"), and current national regulation in force on data protection of personal data (together with the GDPR, "Data Protection Law"), Mediobanca International (Luxembourg) S.A. (hereafter "MBIL", "Bank" or "Controller"), with registered office in Luxembourg, 4 Boulevard Joseph II, L – 1840 Luxembourg, acting as data controller, shall provide disclosure in relation to the use of personal data.

As a general rule, personal data held by MBIL are collected directly from the data subject, and occasionally may be provided by third parties (e.g. in connection with credit or debit transactions arranged by the data subject or by other subjects or where MBIL acquires data from external companies for commercial purposes, for market research, products or services direct offers). Your data may be collected also from third parties such as public or private databases (e.g. land registry/mortgage searches, adverse entry/protest searches, risk registers, etc.).

The processing concerns personal information relating to the data subject, which is processed when entering into a contract with the Bank, as well as in the stages prior to the establishment of the contractual relationship and up to its conclusion. This information is considered personal data pursuant to the GDPR insofar as it relates to a natural person. Data are also to be considered personal data where, in the case of a legal person, they relate directly or indirectly to identified or identifiable natural persons (e.g. directors, employees, managers, collaborators or consultants of such legal person).

### Purpose of the processing and why your personal data is required

All personal data are processed, in compliance with legal provisions and confidentiality obligations, for activities that are strictly connected and instrumental to the following purposes:

- I. Purposes connected with law obligations, regulations, European laws, and instructions from competent Authorities or supervisory and control bodies in relation to anti-money laundering, prevention of fraud, corruption, tax evasion and bribery. Providing personal data for these purposes **is mandatory**. Failure to provide your personal data will prevent MBIL from executing the activities requested by you. The processing is necessary in order to comply with a legal obligation to which MBIL is subject.
- II. Purposes that are strictly connected and functional to the execution of contractual obligations, the fulfillment, before the conclusion of the contract of specific requests from the data subject and judicial and/or non-judicial disputes (i.e., warning letters and activities relating to the enforced recovery of credit, etc.). Providing personal data for these purposes **is mandatory** because necessary for the execution of contractual



obligations (e.g., MiFID questionnaire, subscription forms, update and maintain of records, reporting, etc.). Failure to provide your personal data will prevent MBIL from satisfying your pre-contractual/contractual requests and executing the contract. The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.

### **Legal basis**

The legal basis for the data processing lies in the compliance with laws, and in the execution of contractual obligation.

### **Processing of your personal data**

Your personal data will be processed, in compliance with the Data Protection Law provisions, by means of hard copy, computer or electronic tools, with logics strictly connected to the aforementioned purposes and, in any case, in order to guarantee the security and confidentiality of the data in accordance with the Data Protection Law.

MBIL uses a variety of technical and organisational measures to help protect your personal data from unauthorised access, use, disclosure, alteration or destruction consistent with applicable Data Protection Law.

You are not obliged to provide us with your personal data where it is requested. However, please note that we may be unable to provide certain products or services or proceed with your business relationship if you do not do so.

### **Categories of personal data processed**

In relation to the purposes described above, MBIL processes your personal data, such as – but not limited to:

- ◆ Personal details: name, surname, address, telephone number, email address, date of birth, identity card, nationality, civil status, health card, tax code, and customer code;
- ◆ Data relating to credit applications/relationships and accounting data;
- ◆ Any other personal data provided by you allowing Mediobanca to perform its contractual obligations.

### **Disclosure of personal data**

In order to achieve the abovelisted purposes your personal data will be disclosed internally by MBIL's employees on a need-to-know basis.

Moreover, your data may be communicated to:

- ◆ other Group companies;
- ◆ providers of transmission, packaging, transport and sorting services for communications to clients;
- ◆ other types of subjects of which MBIL makes use for different purposes while providing the product or service;



- ◆ managers of IT systems used by MBIL to process data subject's personal data;
- ◆ subjects providing professional advisory, tax, legal, judicial advisory;
- ◆ subjects providing auditing services;
- ◆ Authorities and Supervisory and control bodies;
- ◆ subjects monitoring financial risk in order to prevent insolvency;
- ◆ subjects managing fraud prevention against banks and financial intermediaries;
- ◆ other Group financial intermediaries in case your transactions are considered to be "suspicious" under Anti-money Laundering Directive.

The complete and up-to-date list of the Bank's data processors is available at [www.mediobancainet.lu](http://www.mediobancainet.lu) in the "Privacy" section.

Your personal data might be transferred outside the European Union only following an adequacy decision by the European Commission or in presence of adequate safeguards under privacy regulations (including binding corporate rules and data protection clauses).

### **Data retention**

In accordance with the principles of proportionality and necessity, personal data will be stored in a form that allows the data subject identification for a period of time not exceeding the achievement of the purposes for which it was initially collected, consistent with the principles of sound and prudent management, or rather considering:

- ◆ the need to continue to store the personal data collected to offer the services agreed upon with the user or to protect the legitimate interests of the Controller, as described in the above purposes, in compliance with the assessments performed by MBIL;
- ◆ the existence of specific credit, legal and reputational risks, as well as regulatory obligations (codes, money laundering legislation, investment services legislation, tax monitoring legislation, regulatory technical standards of the European Banking Authority, etc.) or contractual obligations making the processing and storage of data necessary for specific periods of time.

In any case, for all of the processing purposes specified, the storage periods established by law will be respected, except in the event of interruptions (e.g. lawsuit, pending complaint) and unless the law in force pro tempore establishes different terms.

### **Data subject rights**

Data subjects shall have the right to obtain confirmation from the controller at any time as to whether or not personal data concerning them are being processed, and to know the relative content and source, verify that they are correct or request that they be supplemented or updated or amended (articles 15 and 16 of the GDPR).

Moreover, data subjects shall have the right to request erasure, the restriction of processing, revocation of consent (when received), data portability and submit a complaint to the



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supervisory authority and object, in any case, on legitimate grounds, to their processing (articles 17 et seq. of the GDPR).

The rights should be exercised by means of written communication sent to: [dpo@mediobancaint.lu](mailto:dpo@mediobancaint.lu).

The Controller, directly or through designated facilities, shall process your request and provide you, without undue delay, with full information on the action taken with regard to your request.

#### **Data Controller and Data Protection Officer**

The Data Controller is Mediobanca International (Luxembourg) S.A., with registered office in 4 Boulevard Joseph II, L-1840 Luxembourg.

The Bank appointed a Data Protection Officer who can be contacted at the email [dpo@mediobancaint.lu](mailto:dpo@mediobancaint.lu) or writing at:

Mediobanca International (Luxembourg) S.A.  
Attention: Data Protection Officer  
4 Boulevard Joseph II  
L-1840 Luxembourg

**Mediobanca International (Luxembourg) S.A.**