



Service providers Information Notice required under Articles 13 and 14 of Regulation (EU) 2016/679 and existing national regulations in force on personal data protection

In accordance with Regulation EU 2016/679, the General Data Protection Regulation (the "GDPR") and the existing national regulation on data protection (the "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, as data controller is required to provide an Information notice on the use of personal data.

The personal data held by the Bank are generally collected directly from the data subject and may occasionally be supplied by third parties (e.g. Mediobanca Group companies, archives and public registers).

The processing concerns personal information relating to the service providers, 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 reckon personal data pursuant to the GDPR insofar as it relates to a natural person supplier. Data are also to be considered personal data where, in the case of a legal person supplier, they relate directly or indirectly to identified or identifiable natural persons (e.g. directors, employees, managers, collaborators or consultants of such legal person).

Purposes of the processing and legal basis

All personal data is processed in compliance with the provisions of the law and confidentiality obligations, for purposes that are strictly connected with and instrumenta to the management of the relationship with the service providers, especially in relation to the following purposes:

- I) Purposes connected to the obligations required by law, regulations, EU legislation and provisions issued by the competent authorities or supervisory and control bodies. The provision of personal data for such purposes **is mandatory**. The legal basis is compliance with legal obligations to which the Bank is subject to.
- II) Purposes connected and functional to the performance of contractual and pre-contractual obligations in relation with the establishment and execution of a supply relationship with the Bank. The provision of personal data for such purposes **is mandatory** for the establishment of the contract with MBIL. The legal basis is the condition to establish and manage a contractual relation with the Bank.
- III) purposes connected to any corporate events (sale of the Bank or business units), due diligence or for the defence of legal claims and in relation to the associated preparatory activities. If the prerequisites are met, the data subject may still exercise the right to object as set out below. The legal basis is the Bank's legitimate interest in the continuation of its business activities and the protection of its rights.



- IV) purposes of sending invitations to events or for institutional communication purposes (both on limited occasions). If the prerequisites are met, the data subject may still exercise the right to object as set out below. The legal basis for processing is the legitimate interest in maintaining the relationship with the data subject and providing institutional information.

Data is processed using manual, computer and telematic tools, with logics that are strictly linked to the purposes specified. Processing shall in any case take place in such a way as to guarantee the security and confidential nature of said data, in compliance with MBIL's policies and in accordance with Data Protection Law.

Disclosure of personal data

Personal data collected by the Bank may be processed by employees, consultants and collaborators of the Bank who will act as authorised data processors as a result of the duties assigned to them.

Furthermore, such personal data may be disclosed to:

- ◆ Other companies belonging to the Mediobanca Group;
- ◆ Third-party companies on which MBIL relies for the execution of tenders;
- ◆ Subjects that handle the enveloping, mailing and archiving of documents relating to relationships with suppliers;
- ◆ Subjects that provide services for the management of the Bank's IT system;
- ◆ Subjects that provide professional tax, legal and judicial advisory and assistance services;
- ◆ Subjects that audit and certify the financial statements;
- ◆ Subjects providing insurance services;
- ◆ Debt collectors;
- ◆ Supervisory and oversight authorities and bodies and, in general, public or private entities with public functions;
- ◆ Subjects that identify financial risks in order to prevent the risk of default;
- ◆ Subjects that manage national and international systems to control fraud against banks and financial intermediaries;
- ◆ Other authorities and law enforcement, in the event of a request from them or in the event of a legal obligation.

The subjects belonging to the categories listed above process personal data as separate Data Controllers or as Data Processors specifically designated by the Bank with the guarantees pursuant to art. 28 of the GDPR.

The list of the Bank's data processors is available at www.mediobancaint.lu in the "Privacy" section.



Personal data will only be transferred outside the European Union if a European Commission adequacy decision or other appropriate safeguards established by Data Protection Law are in place (including binding corporate rules and standard protection clauses).

The personal data processed by the Bank are not subject to dissemination.

Categories of personal data processed

In relation to the above purposes, MBIL processes personal data such as personal details (e.g. name, surname, address, telephone number, email address, date of birth, identity card, health card, tax code, marital status, nationality), accounting data, and VAT number. In addition, information concerning events related to the performance of the contract may be processed if it relates directly or indirectly to the data subjects.

Data retention

In accordance with the principles of proportionality and necessity, personal data will be stored in a manner that allows the data subjects to be identified for no longer than the period necessary for the purpose for which it was initially processed, 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.

Rights of the data subject

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 - Right of access by the data subject - and 16 - Right to rectification - of the GDPR);
- ◆ to lodge a complaint, in relation to MBIL processing of personal data, with the local supervisory authority - Commission Nationale pour la Protection des Données ("CNPD");
- ◆ to request erasure, the restriction of processing, revocation of consent (when received), data portability and submit a complaint to the 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.



MEDIOBANCA
INTERNATIONAL (LUXEMBOURG) SA

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 or writing at:

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

Mediobanca International (Luxembourg) S.A.