



Client information notice

Pursuant to Regulation EU 2016/679, the general data protection regulation (the "GDPR"), and the existing national regulation on data protection ("Data Protection Law"), Mediobanca Management Company S.A., with registered office in 2 Boulevard de la Foire 1528-Luxembourg, Grand Duchy of Luxembourg (hereafter "MB ManCo"), acting as data controller or data processor, shall provide disclosure in relation to the use of personal data.

Categories of personal data processed

MB ManCo may collect and process personal data from you in the course of its business, including through your use of the website and when you contact or request information.

The personal data processed includes:

- Name, surname, date of birth and civil status;
- Address, telephone number and email address;
- Identity card and nationality;
- Professional title and occupation;
- Health insurance card, fiscal code and customer code;
- Data relating to credit requests / reports;
- Accounting/Financial data such as tax status, bank account details and evidence of ownership of financial assets;
- Electronic information data such as IP address;
- Any other personal data provided by you allowing MB ManCo to perform its contractual obligations.

Collection of personal data

As a general rule, personal data held by MB ManCo are collected directly from the data subject via, for instance, application forms or any other material which is submitted to us, and occasionally may be provided from third parties (e.g. credit or debit transactions disposed by the data subject or by other subjects or where the MB ManCo 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. title/mortgage searches, prejudicial/protest documents, central credit registers, etc.).

Your personal data may also be collected by using recording and monitoring tools that MB ManCo uses for compliance and/or security purposes.

Furthermore, MB ManCo uses cookies and therefore automatically collects navigation and click-stream data, search terms and HTTP protocol elements.

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.



Purpose of the processing and why your personal data is required

MB ManCo collects and processes personal data in a number of ways and for various purposes.

Your personal data may be used for the following purposes in line with the lawful basis under the GDPR:

- 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 MB ManCo from executing the activities requested by you which entail compliance with law obligations from MB ManCo itself. The processing is necessary in order to comply with a legal obligation to which MB ManCo 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 MB ManCo 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.
- III. Purposes connected with the detection of the clients' degree of satisfaction on quality of service and on the activities provided by MB ManCo (executed directly or through specialized companies), with the promotion and selling of MB ManCo's products and services via letters, telephone, advertising material, electronic communications, market research activities, tailored invitations and complimentaries, public relation activities, also focused or customized, including the involvement of companies that provide activities of transmission, packaging, transportation and sorting of communications to clients, and also in relation to the communication of such data to the Mediobanca Group's companies. Provision of your consent for these purposes **is not mandatory**. The legal ground for process of such personal data is the legitimate interest of MB ManCo. Please note that you can unsubscribe from marketing communications at all time and that the fulfillment of your requests and the execution of your contracts will not be impacted.

Purposes connected with market research and products and services offered by other companies of Mediobanca Group, and the carrying out of public relations activities, also focused and/or customized, from other companies of Mediobanca Group. Provision of your consent for these purposes **is not mandatory**. The legal ground for process of such personal data is the legitimate interest of MB ManCo. Please note that you can unsubscribe from marketing communications at all time and that the fulfillment of your requests and the execution of your contracts will not be impacted.



Protection of your personal data

Your personal data will be processed, in compliance with GDPR and Data Protection Law provisions, through paper, IT and automated 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 Data Protection Law.

MB ManCo 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.

Disclosure of personal data

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

Moreover, your data may be communicated to:

- a) other Group companies;
- b) providers of support services for the execution of your instructions and for the management of payment services, debit and credit cards, tax collection and treasuries;
- c) providers of activities such as issuance, offering, placement, trading, custody of banking, financial and insurance products and/or services;
- d) providers of activities such as preliminary investigation, evaluation, provision, collection and insurance of receivables;
- e) providers of transmission, packaging, transport and sorting services for communications to clients;
- f) other types of subjects of which MB ManCo makes use for different purposes while providing the product or service;
- g) managers of IT systems used by MB ManCo to process data subject's personal data;
- h) subjects providing credit recovery services or providing professional advisory, tax, legal, judicial advisory;
- i) subjects providing auditing services and account certification;
- j) Authorities and Supervisory and control bodies and other private or public subjects with public functions;
- k) third parties operating as providers of payment initiations or account information services;
- l) marketing and market research companies;
- m) subjects monitoring financial risk in order to prevent insolvency;
- n) subjects managing fraud prevention against banks and financial intermediaries;
- o) other Group financial intermediaries in case your transactions are considered to be "suspicious" under Anti-money Laundering Directive.

MB ManCo is committed to transferring personal data to countries outside the EU only where:

- an adequate level of protection (as defined by the European Commission) is ensured; and
- specific measures such as model clauses, issued by the European Commission, or binding corporate rules have been taken.



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. The personal data will be retained:

- for as long as it is necessary for the purpose or purposes for which it was intended, subject always to the legal periods of limitation;
- for the purposes of performing or fulfilling a contractual obligation with you;
- for as long as required or permitted by law.

MB ManCo adopts reasonable measures to guarantee that inaccurate personal data are updated or, where necessary, erased.

Data subject rights

You are entitled to request details of the personal data MB ManCo holds about you and how it processes it. You also have a right to have it rectified or deleted, to restrict MB ManCo's processing of that personal data, to have your personal data transferred directly from us to another controller, and to object to the processing. You may also have the right to lodge a complaint in relation to MB ManCo processing of your personal data with the local supervisory authority, the Commission Nationale pour la Protection des Données (the "CNPD").

If you object to the processing of your personal data, or if you have provided your consent to processing and you later choose to withdraw it, MB ManCo will respect that choice in accordance with legal obligations.

Please be aware that these rights are not always absolute and there may be some situations in which, technically or legally, MB ManCo may not be able to comply with your request.

The rights should be exercised by means of written communication sent to: Compliance-Risk@MB ManComanagementcompany.com.

Data Controller and Compliance Officer

For any questions about MB ManCo's processing of personal data you may send an email at Compliance-Risk@mediobancamanagementcompany.com or write at:

Mediobanca Management Company S.A.
Attention: Compliance Officer
2 Boulevard de la Foire
L-1528 Luxembourg
Grand Duchy of Luxembourg