



## **Employee information notice**

In accordance with 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"), qualifies as data controller and, as such, is required to provide an information notice on the use of personal data to its employees.

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

MB ManCo, as data controller, collects, stores and processes, by electronic or other means, the personal data listed below, in accordance with the Data Protection Law. Failure to provide such personal data may result in MB ManCo not being able to enter into the employment contract or terminating such employment contract.

MB ManCo processes your personal data including, but not limited to, personal details (e.g. name, address, phone number, nationality, ID number, marital status, hobbies), photographs, financial data (e.g. salary, bank details, bonuses and other benefits), job title, professional experience and education, information concerning performance, written and electronic communications, and any other data in connection with the management of your employment relationship.

It is possible that in fulfilling specific obligations relating to the management of the employment relationship, such as accounting, remuneration, social security, welfare and tax matters, MB ManCo may come into possession of data that the law defines as belonging to special categories, i.e., data from which racial and ethnic origin can be revealed, religious beliefs, political opinions, membership of religious, political or union parties, unions, associations or organisations, state of health and sex life (e.g., illness and injury certificates, pregnancy certificates, union delegations, membership of "protected" categories, participation in worker representation organisations, results of medical visits performed in accordance with the law and contract, public offices, etc.).

MB ManCo may also process legal personal data (i.e. data relating to rulings subject to registration with the Criminal Records Office, including capacity as defendant or person under investigation), exclusively in the cases and manner envisaged by the law or by a measure taken by the Luxembourgish data protection authority (for example to assess the requirement of honourableness in respect of those assigned managerial or elective offices, or to arrange for any measures envisaged by collective agreements in connection with criminal proceedings).

In addition to the personal data above, MB ManCo might be provided with information relating to the employees' relatives and friends in connection with emergency contact and medical leaves. By providing this information, the employees confirm to MB ManCo that those persons are aware that their personal information has been provided for this purpose.

### **Mandatory nature of data provision**

Provision of the data is mandatory and necessary to the management of the employment relationship and to fulfil regulatory obligations. Failure to provide such data will make it impossible to fulfil the contract of employment and precisely comply with legal obligations and those stemming from collective bargaining agreements.



## **Collection of personal data**

Personal data held by MB ManCo is generally collected directly from the data subject and may occasionally be supplied by third parties such as head-hunting companies, training agencies, social security, tax administration, insurance companies.

## **Purposes of the processing**

All personal data is processed in compliance with the provisions of the law and confidentiality obligations, for purposes that are strictly connected with and instrumental to managing the employment relationship, including for social security and, in particular:

- 1) to fulfil obligations laid down by the law, a regulation or European legislation, as well as instructions given by competent authorities (e.g. for social security and tax purposes). The processing is necessary for compliance with a legal obligation to which MB ManCo is subject;
- 2) to execute requirements connected with your contract of employment (such as, for example, to note attendance or for situations relating to changes in classification, qualification, increases, redundancies, new hires, payroll, withhold taxes, manage holidays and other leaves, etc.), to fulfil obligations deriving from collective bargaining agreements and your contract of employment or under the scope of an internal disciplinary measure. The legal basis for processing is the need to execute the contract of employment stipulated with MB ManCo;
- 3) for other activities connected with the management of the contract of employment, including the stipulation of non-mandatory insurance policies or which are not envisaged by current contracts of employment, company news, awards following performance assessments, participation in corporate events, etc. The legal basis for processing is the consent you have given (for instance for complementary insurance policies), or the legitimate interest of MB ManCo.

The internal regulations defined by MB ManCo are available on the corporate intranet for consultation; these specify how employees should use their e-mail and the internet and clearly set out how the corporate tools made available can be used and how controls are run.

## **Protection of your personal data**

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 the said data, in compliance with the provisions of current applicable legislation.

Some Supervisory Authorities require the registration of orders given over the telephone by clients. Telephone conversations or telematic data traffic may therefore be recorded in some organisational units (such as Trading Rooms) and the recordings kept for the length of time required by the law and regulation, using procedures designated by the relevant authorities.



### **Disclosure of personal data**

Data may be disclosed to:

- Companies processing payslips and pension contributions;
- Companies which archive documents;
- Companies processing data and managing computer systems;
- MB ManCo Group companies;
- Mandatory social security and tax entities; public or private health institutions for health visits;
- Welfare and/or social security entities and funds;
- Insurance companies (accident/illness policies);
- Banks for the payment of salaries, deposit of signatures, Bank of Italy supervision;
- Trade union organisation for the payment of subscription fees;
- Companies supplying badges for the detection of attendance or meal tickets or entities appointed to provide tax assistance;
- Travel agencies for travel document requests;
- External consultants or managerial institutions.

### **Data retention**

In compliance with principles of proportionality and necessity, personal data will be kept in a manner that enables the data subjects to be identified for no longer than the period necessary for the purpose for which it was initially collected, or rather considering:

- 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.

### **Rights of the data subject**

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").



**MEDIOBANCA**  
MANAGEMENT COMPANY SA

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@mediobancamanagementcompany.com](mailto:Compliance-Risk@mediobancamanagementcompany.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](mailto: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