



## **Service providers information notice**

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 Management Company S.A. with registered office in 2 Boulevard de la Foire 1528-Luxembourg, Grand Duchy of Luxembourg (hereafter "MB ManCo"), as data controller, is required to provide an Information notice on the use of personal data.

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

MB ManCo may collect and process personal data from you such as your name, surname, employer, professional title, occupation, professional address and signature, and any other personal data provided by you in the course of your dealings with MB ManCo.

### **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 the following purposes:

- to enter into a contractual relationship with you;
- to fulfil legal obligations, in particular as regards initial due diligence prior to entering into a contractual relationship and ongoing due diligence thereafter;
- in order to carry out anti-money laundering checks and related actions which are necessary to comply with legal obligations, in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis;
- for prudential and risk management purposes;
- to fulfil specific requests made by you;

### **Compulsory nature of data provision**

The provision of data is necessary for MB ManCo to enter into a contractual relationship. Any refusal to supply such data will make it impossible to go about the activities necessary to the conclusion and execution of the agreement.

### **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 said data, in compliance with with MB ManCo's policies and in accordance with Data Protection Law.



### **Disclosure of personal data**

Your personal data may be disclosed to subjects carrying out processing and/or providing services strictly functional to precontractual activities and the execution of the contract (also with continuous processing) within MB ManCo or Mediobanca's group entities, such as:

- public and private subjects able to access the data by virtue of provisions of the law, regulation or European Community legislation, within the limits set out therein;
- our consultants, within the limits necessary to fulfil their appointments, after having received a letter of appointment from us, binding them to confidentiality and secrecy.

Data may be disclosed to persons in charge of the processing/authorised operators employed by MB ManCo.

### **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, or rather considering:

- the need to continue to store the personal data collected to offer the services agreed with the user or to protect the legitimate interests of MB ManCo, as described in the above purposes;
- the existence of specific regulatory (codes, money laundering legislation, investment services legislation, tax monitoring legislation, etc.) or contractual obligations making the processing and storage of data necessary for specific periods of time.

### **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").

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.



**MEDIOBANCA**  
MANAGEMENT COMPANY SA

**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