

INTEGRATED CUSTOMER DUE DILIGENCE (“CDD”) FORM

(PURSUANT TO ITALIAN LEGISLATIVE DECREE N. 231/2007 IMPLEMENTING Directive (EU) 2015/849 AS AMENDED)

By signing this Form, the interested party declares to have read the "Information notice for customers" section contained at the bottom of it. We also invite you to read the information provided on the customer's obligations and on the criminal sanctions provided for by Legislative Decree no. lgs. n. 231/2007 in case of false or untruthful declarations. **The information contained in this Form, once completed, is to be considered confidential.**

A. CUSTOMER IDENTIFICATION

Registered legal name:

Tax Code (if any)¹:

Legal form:

Geographical area where the activity is mainly carried out:

Is the Customer a company listed on a European regulated market?

YES ☐ NO

Registered office

Legal address:

City:

Country:

If the client is a non-profit organization, indicate the type(s) of beneficiaries the activities are directed to:

Type(s) of beneficiaries:

¹ Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

B. STATEMENT ON ENTITY LIABILITY AND MAJOR SANCTIONED COUNTRIES ("MSC")

B.1 CUSTOMER STATEMENT

- | | | |
|---|-----|----|
| a) Has the Customer adopted and implemented a compliance program that includes an organization, management and control model and precautions aimed at preventing offences committed in the interest or advantage of the Customer? | YES | NO |
| b) Has any precautionary measure been enacted or has any conviction (including through agreement to a plea bargain) been issued against the Customer and/or its parent and/or subsidiaries in relation to offences under Italian Legislative Decree 231/2001 and/or equivalent foreign laws on entities' liability for offences committed in their interest or advantage? | YES | NO |
| c) Is (i) any proceeding or investigation pending against the Customer or its parent and/or subsidiaries offences under Italian Legislative Decree 231/01 and/or equivalent foreign laws on entities' liability for offences committed in their interest or advantage (ii) where applicable (e.g., Banks, Asset Management Companies, other entities subject to AML/CFT legislation), any sanction been issued in the past 5 years by Supervisory Authorities against the company or its representatives (in the performance of their duties at the Company or within the Group) for deficiencies in the internal control system? | YES | NO |
| d) (If applicable) In the last five years was the Customer or any member of the Customer's Group served with any communication pursuant to articles 84 et seq. of Italian Legislative Decree 159/2011 (documentazione antimafia di carattere interdittivo) restricting activities due to connection with organized crime? | YES | NO |
| e) Does the customer, directly or indirectly through associates, parent companies or subsidiaries, carry out activities linked to anti-personnel mines, cluster munitions and submunitions as identified by article 1(1) of the Italian Law No. 220 of December 9, 2021? | YES | NO |
| f) Does the customer, including any parent company, subsidiary and/or affiliate, operate in compliance with and refrain from acting in circumvention of the international sanctions framework adopted by the United Nations (UN), the European Union, Italy and/or the U.S.A.? | YES | NO |
| g) Does the Customer, any parent Company, subsidiary and/or affiliate, produce and/or market dual-use goods or technologies and/or military equipment? | YES | NO |

If the answer to questions b) or c) is affirmative, provide, in a specific declaration to be attached to this Form, further information on the state of the procedure, including any precautionary measures applied and / or sentences pronounced, on the company concerned (ie Customer and / or subsidiaries and / or parent companies) and on the natural persons involved, also specifying the types of offense and the time references.

If the answer to question d) is affirmative, provide, in a specific declaration to be attached to this Form, further information on the situations that led to the issue of anti-mafia documentation of an interdictive nature and on the relative consequences and effects, also specifying the company concerned (ie Customer and / or subsidiaries and / or parent companies), the time references, the remedial actions implemented and the possible revocation of the interdictive subsequently intervened.

If the answer to point (g) is affirmative, please provide, in a specific declaration to be attached to this Form, at least the following information:

- i) details on the type of goods;
- ii) details regarding any export of such goods to non-EU countries, including the countries involved;
- iii) statements regarding compliance with the applicable export control regulations (e.g., obtaining the required authorisations, conducting End User checks, obtaining an End User Statement);
- iv) description of the internal controls adopted in the area of export control and trade compliance (including, in particular, the adoption of an internal regulatory framework defining roles and responsibilities, training activities, ex-ante checks and ongoing monitoring of transactions, customers and end users, and record-keeping of data and information).

² "Construction, production, development, assembly, repair, conservation, use, utilization, warehousing, possession, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions, of any nature or composition, or parts thereof".

B.2 “MSC Questionnaire” – Aggregate exposure to Major Sanctioned Countries (MSC):

Please provide the following information about the Customer, its parent companies, subsidiaries and/or affiliates (including foreign branches) and/or joint ventures to which it participates (jointly, the “Group” or the “Group Entities”) relating to the specified Countries:

- a) Current or planned legal or operational location (e.g. registered office, other offices, including non-active offices, branches, etc.);
- b) Business relationships of the Customer, or of the Group’s company, or of the Group in aggregate, indicating the corresponding percentage of revenue;
- c) Transactions to/from MSC (regardless of their value) involving the oil & gas sector, nuclear energy, arms and weapons, dual use goods or technologies.

If yes, please fill the boxes with details on the relevant exposure: (i) the name and identification code of the relevant company; (ii) % of MSC-generated revenues compared to the relevant company’s revenues; (iii) % of MSC-generated revenues compared to the Group’s aggregate revenues; (iv) whether the relevant Company is directly or indirectly involved in the transaction/business relationship; (v) source of MSC-generated revenues (transactions, investments, etc.) generated in the MSC.

AGGREGATE EXPOSURE TO NORTH KOREA

☐ YES ☐ NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

AGGREGATE EXPOSURE TO SYRIA

☐ YES ☐ NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

B.2 “MSC Questionnaire” – Aggregate exposure to Major Sanctioned Countries (MSC):

AGGREGATE EXPOSURE TO VENEZUELA

YES

NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

AGGREGATE EXPOSURE TO IRAN

YES

NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

AGGREGATE EXPOSURE TO CRIMEA

YES

NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

AGGREGATE EXPOSURE TO Non-Controlled Areas of Ukraine

The expression "Non-Controlled Areas of Ukraine" means the areas of Ukraine not controlled by the Ukrainian government as defined in the notion of "specified territories" pursuant to Article 1 of Regulation (EU) no. 263/2022.

YES

NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

B.2 “MSC Questionnaire” – Aggregate exposure to Major Sanctioned Countries (MSC):

AGGREGATE EXPOSURE TO BIELORUSSIA

☐ YES ☐ NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

AGGREGATE EXPOSURE TO RUSSIA

☐ YES ☐ NO

Reason of exposure: ☐ a) ☐ b) ☐ c)

IF ANY EXPOSURE TO RUSSIA AND/OR BIELORUSSIA IS DECLARED:

- 1) indicate if such exposure concerns one of the following sectors and if selected, the the exposure in terms of percentage of the company or Group revenues

- (a) Energy
- (b) Aerospace
- (c) Minerals
- (d) Telecommunications
- (e) Trasport
- (f) Defence
- (g) Siderurgy
- (h) Luxury

- 2) confirm that such exposure does not concern:

(a) business relations with the Donbass or other territories of Ukraine not subject to Ukrainian government control as a result of military intervention by the Russian Federation;

(b) business relationships with entities or individuals subject to asset or economic resources freeze measures or any other international sanction adopted by the United Nations (UN), the European Union, Italy and/or the United States of America (USA);

(c) dual-use goods and technologies;

(d) quasi-dual-use assets that could aid in Russia's or Bielorusia's military and technological advancement or in the development of the defense and cyber security, information security, sensor and laser, marine, aerospace and propulsion;

(e) other business relationships, services, goods and technologies subject to restrictive measures adopted following the Russian-Ukrainian crisis.

B.3 Aggregate exposures to non-EU countries

Please state if the Customer, its parent Companies and/or subsidiaries (as applicable), its affiliates (including foreign branches) and joint ventures to which it participates (jointly, the "Group" or the "Group Entities") has, or plans to have, business relationships with the following non-EU Countries that exceed, even approximately, 5% of the Customer's or the Group's total individual revenues for each indicated non-EU Country

Brazil, Taiwan, Singapore, Georgia, Indonesia, Egypt, Vietnam, Saudi Arabia, China, India,	YES	NO
Kyrgyzstan, Turkey, Uzbekistan, Mongolia, Hong Kong, Kazakhstan, Armenia, United Arab		
Emirates (UAE), Azerbaijan, Israel, Pakistan, South Sudan, Malaysia, Thailand		

1) If the answer is YES, please provide details in the table below

Non-EU Country	% revenues of Customer	% revenues of "Group"
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2) If the answer is affirmative, please provide below the name and identification code of the relevant company and any further information regarding the economic activity carried out in each non-EU country with which relevant business relationships exist.

Please indicate whether the Client or the Group has business relationships with additional non-EU countries that exceed, even approximately, 10% of total revenues

YES NO

If the answer is YES, please indicate the additional relevant non-EU countries and the percentage of revenues for both the Customer and the Group

C. TAX TRANSPARENCY DECLARATIONS

Please indicate if:

- a) the Customer
- b) the Customer's beneficial owner
- c) the Customer's controlling shareholders

have their legal seat/place of residence if a Country of Barrage³

1. if yes, please identify the relevant individual/entity referred to in letters a), b) and c), the legal seat/residence country:

Type of subject ((a), b), c)	Subject (name surname/legal name)	Country
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2. If the relevant individual/entity referred to in letters a), b) or c) have their legal seat/place of residence in a Country of Barrage please confirm that:

- 2.1. there are sound business reasons (other than tax reasons) for such location and it is not aimed at taking advantage of the technicalities of a tax system or of mismatches between two or more tax systems for the purpose of reducing tax liability; ☐ YES ☐ NO
- 2.2. they have effective physical location links with such country (for example: a significant proportion of the investments in tangible and/or intangible assets are made within such country, operations in such country are carried out through local offices, revenues are generated locally, staff is employed locally and/or taxes are being paid locally) ☐ YES ☐ NO

3. Indicate whether the individual/entity referred to in letters a), b), c) having their legal seat/place of residence in a Country of Barrage were the recipients of a definitive decision, also of an administrative nature, of assessment or subject of disputes or proceedings by the competent authorities regarding:

- 3.1. failure to comply with the obligations relating to the payment of taxes and duties or with the obligations relating to the payment of social security contributions according to applicable law; ☐ YES ☐ NO
- 3.2. the establishment of an entity in any jurisdiction with the intention of evading tax, social security or other legal obligations ☐ YES ☐ NO

If yes, please identify the relevant individual/entity referred to in letters a), b) and c) and provide the details required

Type of subject ((a), (b) (c))	Subject (name surname/legal name)	Authority	Description of the conduct ascertained by the final decision or object of dispute or proceedings and the state of the same
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If any of the answers to point 2 or 3 above is Yes, please provide any useful additional information concerning the answer provided or attach reference documents which might be useful to substantiate the sound business reasons for links identified:

³ Countries for which the competent European and international authorities have found an unsatisfactory application of the internationally agreed standards on anti-money laundering and prevention of terrorist financing and, jointly, tax transparency. For the purposes of this Form, such countries are Trinidad and Tobago, Vanuatu, British Virgin Islands, Vietnam and Russian Federation.

D. IDENTIFICATION OF THE EXECUTOR (the Undersigned)

When the Customer is a legal entity, “executor” means the natural person acting on behalf of the customer upon due authorization (i.e. person empowered to act).

Source of the power to act on behalf of the customer:

Legal Representative

Certificate of incorporation

Articles of association

Appointment Resolution

Proxy Statement

Other (*specify*):

Role:

Identification data

Surname:

Name:

Tax Code (if any)⁴:

Date of Birth:

Country of Birth:

Place of residence

Address:

City:

Country:

Place of domicile (if different from residence)

Address:

City:

Country:

⁴ Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

E. IDENTIFICATION OF THE BENEFICIAL OWNER

“Beneficial owner” means any natural person(s) who ultimately owns or controls the Customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted. In this form, it is possible to indicate up to three beneficial owners. Replicate the following section to indicate additional beneficial owners, if the following sections should be replicated.

The criteria used to determine the beneficial ownership of the Customer must be specified from the following:

1. Natural person who holds:
 - a) a shareholding of 25% plus one share or an ownership interest of more than 25% in the customer (*direct ownership*);
 - b) A shareholding of 25% plus one share or an ownership interest of more than 25% in the Customer, held through subsidiaries, trust companies or intermediaries (*indirect ownership*).

2. Natural person who ultimately controls the Customer through the control of an enough percentage of the voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means.

In addition to the above, the ‘control through other means’ such as for example: close family relationships, historical or contractual relationships, constitutes a further case of control; using, enjoying or benefiting from the assets owned by the customer; responsibility for strategic decisions that fundamentally affect the business practices or general direction of a legal person; differentiated voting rights; the power to appoint the majority of the members of the board of directors or similar officers of the company, especially in cases where the appointment rights do not depend on the shareholding held; control through debt instruments, where a creditor or third party can control a legal entity or influence a shareholder based on the provisions of the loan agreement; control, shared or otherwise, through formal or informal agreements with owners, partners or companies; the use of formal or informal fiduciary appointment agreements.

3. Natural person(s) who hold the position of senior managing official(s) if, after having exhausted all possible means, no person under points (1) and (2) is identified.
4. In the case of trusts, all the following persons:
 - a) the settlor(s);
 - b) the trustee(s);
 - c) the protector(s), if any;
 - d) the beneficiaries or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;
 - e) any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means.

E.1 Identity details of the beneficial owner

Identification data

Surname:

Name:

Tax Code (if any)⁵:

Date of Birth:

Country of Birth:

Place of residence

Address:

City:

Country:

Place of domicile (if different from residence)

Address:

City:

Country:

Geographical area where the activity is mainly carried out:

Main source of income

Company employee:

Public employee:

On pension:

Other Specify:

Company manager:

Public Manager:

Unemployed:

Business man:

Self-Employed:

Recipient of other incomes:

Indicate the sector:

Does the person belong to categories of Politically Exposed Persons (PEP)⁶?

YES

NO

If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:

Criteria used to determine the beneficial ownership:

1. a) b)

2. ☐ **Role held:**

Control through other means:

3. ☐ **Role held:**

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a) ☐ b) c) d) e)

⁵ Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

⁶ Please, refer to the definition in the endnotes.

If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information

Work condition:

Work activity:

Sector:

Business relations in non-EU countries:

☐ NO ☐ YES (specify the countries):

Annual income capacity (after tax):

- | | |
|--|-----------------------------|
| ☐ up to € 100.000 | from € 100.000 to € 500.000 |
| ☐ from € 500.000 to € 1.000.000 | over € 1.000.000 |

Total personal assets (securities and real estate):

- | | |
|---|-------------------------------|
| ☐ up to € 500.000 | from € 500.000 to € 1.000.000 |
| ☐ up from € 1.000.000 to € 5.000.000 | over € 5.000.000 |

Origin of the funds used in the relationship (where applicable):

Proceedings

Are there any criminal proceedings pending or concluded with a conviction (including non-final) or with the application of a penalty upon request (plea bargaining) against the beneficial owner, in relation to predicate offences/related to money laundering (including, by way of example and not limited to, offences against Public Administration, market abuse offences, corporate crimes, organised crime offences, offences of receiving stolen goods, money laundering and use of proceeds from illicit activities, as well as self-laundering, fraud, and tax crimes)?

YES NO

In the event of an affirmative answer, please provide further information on the status of the proceedings, including any precautionary measures applied and/or convictions, also specifying the types of offences and the relevant timeframes.

E.2 Identity details of the beneficial owner

Identification data

Surname:

Name:

Tax Code (if any)⁸:

Date of Birth:

Country of Birth:

Place of residence

Address:

City:

Country:

Place of domicile (if different from residence)

Address:

City:

Country:

Geographical area where the activity is mainly carried out:

Main source of income

Company employee:

Public employee:

On pension:

Other Specify:

Company manager:

Public Manager:

Unemployed:

Business man:

Self-Employed:

Recipient of other incomes:

Indicate the sector:

Does the person belong to categories of Politically Exposed Persons (PEP)⁹?

YES

NO

If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:

Criteria used to determine the beneficial ownership:

1. a) b)

2. ☐ **Role held:**

Control through other means:

3. ☐ **Role held:**

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a) b) c) d) e)

⁸ Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

⁹ Please, refer to the definition in the endnotes.

If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information

Work condition:

Work activity:

Sector:

Business relations in non-EU countries:

☐ NO ☐ YES (specify the countries):

Annual income capacity (after tax):

☐ up to € 100.000 from € 100.000 to € 500.000
☐ from € 500.000 to € 1.000.000 over € 1.000.000

Total personal assets (securities and real estate):

☐ up to € 500.000 from € 500.000 to € 1.000.000
☐ from € 1.000.000 to € 5.000.000 over € 5.000.000

Origin of the funds used in the relationship (where applicable):

Proceedings

Are there any criminal proceedings pending or concluded with a conviction (including non-final) or with the application of a penalty upon request (plea bargaining) against the beneficial owner, in relation to predicate offences/related to money laundering (including, by way of example and not limited to, offences against Public Administration, market abuse offences, corporate crimes, organised crime offences, offences of receiving stolen goods, money laundering and use of proceeds from illicit activities, as well as self-laundering, fraud, and tax crimes)?

YES NO

In the event of an affirmative answer, please provide further information on the status of the proceedings, including any precautionary measures applied and/or convictions, also specifying the types of offences and the relevant timeframes.

E.3 Identity details of the beneficial owner

Identification data

Surname:

Name:

Tax Code (if any)¹¹:

Date of Birth:

Country of Birth:

Place of residence

Address:

City:

Country:

Place of domicile (if different from residence)

Address:

City:

Country:

Geographical area where the activity is mainly carried out:

Main source of income

Company employee:

Public employee:

On pension:

Other Specify:

Company manager:

Public Manager:

Unemployed:

Business man:

Self-Employed:

Recipient of other incomes:

Indicate the sector:

Does the person belong to categories of Politically Exposed Persons (PEP)¹²?

YES

NO

If yes, please indicate the public role held and/or the relationship with the Politically Exposed Person and his/her role:

Criteria used to determine the beneficial ownership:

1. a) b)

2. ☐ **Role held:**

Control through other means:

3. ☐ **Role held:**

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a) b) c) d) e)

¹¹ Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

¹² Please, refer to the definition in the endnotes.

If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information

Work condition:

Work activity:

Sector:

Business relations in non-EU countries:

☐ NO ☐ YES (specify the countries):

Annual income capacity (after tax):

☐ up to € 100.000 from € 100.000 to € 500.000
☐ from € 500.000 to € 1.000.000 over € 1.000.000

Total personal assets (securities and real estate):

☐ up to € 500.000 from € 500.000 to € 1.000.000
☐ from € 1.000.000 to € 5.000.000 over € 5.000.000

Origin of the funds used in the relationship (where applicable):

Proceedings

Are there any criminal proceedings pending or concluded with a conviction (including non-final) or with the application of a penalty upon request (plea bargaining) against the beneficial owner, in relation to predicate offences/related to money laundering (including, by way of example and not limited to, offences against Public Administration, market abuse offences, corporate crimes, organised crime offences, offences of receiving stolen goods, money laundering and use of proceeds from illicit activities, as well as self-laundering, fraud, and tax crimes)?

YES NO

In the event of an affirmative answer, please provide further information on the status of the proceedings, including any precautionary measures applied and/or convictions, also specifying the types of offences and the relevant timeframes.

F. DECLARATION ON THE PURPOSE AND INTENDED NATURE OF THE BUSINESS RELATIONSHIP

Intended nature

- ☐ Establishment of a financing relationship (loan)₅
- ☐ Request for a disbursement
- ☐ Other (*specify*):

Purpose

Country of origin of the funds used in the relationship or operation:

- ☐ Italy
- ☐ Europe
- ☐ non-EU countries (*specify*):

Country of destination of the funds involved in the operation

- ☐ Italy
- ☐ Europe
- ☐ non-EU countries (*specify*):

The Undersigned, as Executor on behalf of the Customer identified under section D, being aware of the criminal liability to which it may be subject pursuant to art. 55 of Legislative Decree no. 231/2007¹⁴ in the event of an omission or false information, in compliance with provisions of art. 22 of said Decree, declares that the information provided herein is true and also declares to have provided any information of which he is aware, also in relation to the beneficial owner.

Place and Date:

Signature of Declarant:

Identification documents to be attached:

1. Only if the Form is not signed with a digital signature valid in Italy, copy of the executor's identification document
2. Only if the executor is different from the legal representative, copy of the document from which the executor's power of act derives
3. Representative diagram of the entire ownership structure aimed at identifying the beneficial owner declared.
4. In the event of an affirmative answer to questions (b), (c), (d), or (g), please attach the required declarations;
5. Latest version of the deed of establishment, in the event that a trust is present within the client's ownership structure;
6. Declaration of the fiduciary company regarding the identity of the trustors and the related percentage of share capital held, in the event that such entity is present within the client's ownership structure.

CDP reserves the right to request, if deemed necessary, a copy of the identification document of the Beneficial Owner or other documents.

Definition: “Politically Exposed Persons”

Politically Exposed Persons shall mean:

Natural persons who holds or has ceased to be entrusted for less than a year with prominent public functions and the immediate family members and persons known to be close associates of such persons, identified based on the following criteria:

1. natural persons who are or have been entrusted with prominent public functions shall mean:
 - a) heads of Country, heads of government, ministers and undersecretaries, head and assessor of region, mayor of provincial capital or metropolitan city, mayor of municipality with a population of not less than 15,000 inhabitants and similar offices in foreign countries;
 - b) members of parliament, European parliamentarian, regional councilor and similar offices in foreign countries;
 - c) member of central decision-making bodies of political parties;
 - d) members of supreme courts, constitutional courts and other high-level judicial bodies, whose rulings are not generally subject to further appeal, barring exceptional circumstances;
 - e) members of Country audit offices and of the boards of directors of central banks;
 - f) ambassadors, chargés d'affaires or equivalent positions in foreign countries, high-ranking officials in the armed forces or similar offices in foreign countries;
 - g) members of the administrative, management or supervisory bodies of subsidiaries control, even indirectly, by the Country or by a foreign Country or participated, with a prevalent or totalitarian measure, by the Regions, by provincial capitals and metropolitan cities and by municipalities with a total population of no less than 15,000 inhabitants;
 - h) general manager of ASL or hospital, university hospital and other national health service organizations;
 - i) director, deputy director and member of the management body or entity carrying out equivalent functions in international organizations;
2. Close relatives shall mean: parents, spouses or person linked in civil union or cohabitation in fact or similar institutions to politically exposed children and their spouses as well as persons linked to the children in civil union or cohabitation in fact or similar institutions;
3. For the purposes of identifying the persons with whom the natural persons listed in paragraph 1 above are known to have close relationships, reference shall be made to:
 - a) any natural person who is known to have joint beneficial ownership of legal entities or any other close business relationship with a person referred to in paragraph 1;
 - b) any natural person who is the sole beneficial owner of legal entities or legal persons known to have been de facto established for the benefit of a person referred to in paragraph 1.

INFORMATION ON THE CUSTOMERS' OBLIGATIONS PROVIDED FOR D. LGS. N. 231 OF 21 NOVEMBER 2007

Article 22 "Obligations of the customer"

Customers shall provide in writing, on their own responsibility, all the necessary and updated information for the natural and legal persons subject to this decree to comply with the customer due diligence requirements.

Article 55 paragraph 3 "Criminal sanctions"

Unless the act constitutes a more serious crime, anyone who is obliged, pursuant to this decree, to provide the data and information necessary for the identification due diligence, provides false data or information, shall be punished with from six months' to three years imprisonment and a fine of from €10,000 to €30,000.

INFORMATION NOTICE FOR CUSTOMERS

1. Data Controller

Pursuant to the European Regulation 2016/679 (below GDPR), Cassa Depositi e Prestiti S.p.A. (below, CDP), with head office in Rome, Piazza Verdi n. 10 (00198), processes your personal data in its capacity as "Data Controller" in compliance with the provisions of law and informing you of the use of said personal data. The Personal Data Protection Officer can be contacted by writing to the email address privacy@cdp.it.

2. Sources and type of data processed

The personal data held by CDP are collected directly from the customers or from third parties, for example Public Administrations, Public Registers, Chambers of Commerce, Databases of private companies. The data processed by CDP can include personal information (*first name, surname, date of birth, address, image, sex, marital status, tax identification no., etc.*) and contact information, as well as in specific cases the photo of the identification document (front/back), personal data present in the identification document used and photo of the face present in the video selfie procedure.

Furthermore, in complying with specific requirements relative to management of the business relationship (for example mandatory communications to the Authorities), and in the case of customer communications, CDP may process particular categories of data in accordance with art. 9 GDPR and data relating to criminal convictions and offences in accordance with art. 10 of the GDPR.

3. Purpose and legal basis of the data processing

The personal data are processed during the normal activity of CDP according to the following purposes: a) Purposes strictly connected with and instrumental to the establishment and management of relations with the customers pursuant to art. 6 paragraph 1 letter b) GDPR; b) purposes deriving from legal obligations, regulations, EU law, provisions issued by authorities authorized for the purpose by the law or by supervisory and control bodies pursuant to art. 6 paragraph 1 letter c) GDPR. Provision of personal data for the above purposes is necessary to finalize, carry out or continue the contract relationship with CDP.

4. Data processing method

In relation to the purposes specified, processing of the personal data is carried out by manual, IT and telematic instruments using logic appropriate for the purposes and, in any case, such as to guarantee the security and confidentiality of the data. Protection is ensured also in the presence of innovative instruments introduced by CDP.

Furthermore, it may happen that CDP uses specific identification techniques carried out through an automated technique based on the comparison between the image of the document you upload, and a video of your face recorded in real time. The verification activity is aimed at authenticating the documents and comparing the portrait of the face present on an identity document (e.g., identity card, passport, driving license, health card) with the image extracted from a video selfie taken directly by you.

5. Storage of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected in accordance with the principle of minimization pursuant to art. 5.1.c) GDPR.

6. Categories of subjects to whom the data can be communicated

For pursuit of the above purposes, CDP may communicate your personal data to third parties if said data communication operations are instrumental to the services requested and provided. Your data may furthermore be communicated to managers of private credit information systems. Further communications will be possible to guarantors, if relevant to the existing guarantee relationship. Your data may furthermore be communicated to companies forming part of the group, for administrative and accounting purposes, and to third parties in compliance with legal requirements. The subjects belonging to the above-mentioned categories perform the function of Data Supervisor or operate totally autonomously as distinct Data Controllers.

7. Transfer data outside the EU

CDP will carry out the processing in accordance with the procedures permitted by the current law, such as consent of the Data Subject, adoption of standard clauses approved by the European Commission, selection of subjects adhering to international programs for the free circulation of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

8. Rights of the Data Subject

You are informed that art. 15-22 GDPR entitle the Data Subjects to exercise specific rights. These rights can be exercised by request sent by post to Cassa depositi e prestiti S.p.A., Piazza Verdi, n. 10, 00198 Rome, att. Personal Data Protection Officer, or by email directly to said Officer, at the contacts provided in point 1. The Data Subject also has the right to raise complaints with the Italian Data Protection Authority.