

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA
pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

1. Data Controller

Pursuant to Regulation (EU) 2016/679 (the GDPR), Cassa Depositi e Prestiti S.p.A. (hereinafter, CDP), with registered office in Roma, Piazza Verdi n. 10, 00198, processes your personal data as the Data Controller in compliance with applicable laws and informs you about the use of such personal data.

The Personal Data Protection Officer (DPO) can be contacted by writing to the following e-mail address privacy@cdp.it

2. Sources and Types of Data Processed

The personal data held by CDP are collected directly from customers, including through the use of distance communication techniques (such as the website and the web services it contains) or from third parties such as, for example, Public Administrations, Public Registers, C.C.I.A.A., databases of private companies.

Where CDP acquires data from external companies for the purposes of commercial information, market research, direct offers of products and services, an information notice will be provided at the time the data are recorded or, in any event, no later than the first communication, if any.

The data processed by CDP may include personal information (*first name, surname, date of birth, address, image, gender, marital status, tax code, etc.*), contact information and, in specific cases, the photograph of the identification document (front/back), personal data contained in the identification document used and a photo of the face shown in the video selfie.

Finally, in complying with specific regulatory obligations relating to the management of the relationship (such as, for example, mandatory communications to the Authorities), CDP may process special categories of data under Article 9 of the GDPR and judicial data under Article 10 of the GDPR.

3. Purposes and legal basis of the processing for which the data are intended

Personal data are processed in the context of CDP's ordinary business activities for the following purposes:

- a) Purposes relating to the receipt of requested information about products and services;
- b) Purposes relating to the organisation of and participation in events organised by CDP;
- c) Purposes strictly connected with and instrumental to the establishment and management of customer relationships (e.g. acquisition of information prior to entering into a contract, execution of transactions on the basis of obligations arising from contracts entered into with customers, etc.) pursuant to Article 6(1)(b) of the GDPR.

d) Purposes arising from legal obligations, regulations, EU legislation, provisions issued by authorities legally entitled to do so or by supervisory and control bodies (in the case, for example, of so-called 'anti-money laundering' legislation requiring customer due diligence, or the instructions issued by the Banca d'Italia in relation to the performance of lending activities) pursuant to Article 6(1)(c) of the GDPR;

The provision of personal data for the purposes indicated above is necessary to finalise, perform or continue the contractual relationship with CDP / obtain requested information on CDP products and services.

- e) Purposes relating to CDP's commercial promotion and information activities, for which the customer may give or withhold consent pursuant to Article 6(1)(a) of the GDPR.

The provision of data for the purpose under point e) is optional and the related processing is subject to the legal basis of consent. Failure to consent to the processing will not allow the promotional activities indicated but will not prejudice the Data Subject in any way.

Finally, as part of the promotional electronic communications sent under point e), CDP may use tracking tools that make it possible to detect information relating to the data subject's interaction with the communications

received such as, for example, whether the message was opened and additional technical information associated with its display. This information is used to measure

4. Data processing methods

In relation to the purposes indicated, personal data are processed using manual, IT and telematic tools, using logic strictly related to those purposes and, in any event, in such a way as to ensure the security and confidentiality of the data. Protection is also ensured where innovative tools introduced by CDP are used.

In addition, CDP may use specific identification techniques carried out through an automated technique based on comparing the image of the document you upload with a video of your face recorded in real time. The verification activity is intended to authenticate the documents and compare the facial portrait on an identity document (e.g. identity card, passport, driving licence, health card) with the image extracted from a video selfie taken directly by the data subject.

5. Storage of personal data

Your Personal Data will be kept only for the time necessary for the purposes for which they are collected in accordance with the principle of minimisation pursuant to Article 5.1(c) of the GDPR and, with reference to promotional and marketing purposes, for a period of time in any event not exceeding 10 years.

CDP may retain some data after the contract termination, depending on the amount of time required in order to manage specific contractual or legal compliance obligations, and also for purposes of administrative, tax and/or social security compliance, for the period of time imposed by applicable legislative and regulatory provisions and required in order to enforce any rights and entitlements in legal proceedings. In any case, in addition to complying with applicable law, data are processed in accordance with the principles of confidentiality inherent in carrying out financial activities, which CDP has always followed.

6. Categories of persons to whom data may be disclosed

To pursue the purposes set out above, CDP may disclose your personal data to third parties where such disclosure operations are instrumental to the services requested and provided.

CDP may disclose your personal data to third parties that will act as independent Data Controllers or will be appointed as Data Processors and which essentially fall within the following categories:

- subsidiaries or affiliates;
- public or private entities that detect financial risks for the purpose of preventing insolvency risk as provided for by law;
- entities providing banking, financial and insurance services, including entities involved in the management of payment systems, collection agents and treasury services;
- entities providing services for the management of the information system, including CDP's website, web applications and telecommunications networks (including e-mail);
- entities carrying out activities for the transmission, enveloping, transport and sorting of communications with customers;
- entities carrying out archiving and retention activities, including electronic archiving, of documentation relating to relationships with customers;
- debt collection companies;
- persons, companies, associations or professional firms providing services or assistance and consultancy activities to CDP, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters;
- entities carrying out control, audit and certification requirements in relation to the activities carried out by CDP, also in the interest of customers.

7. Transfer of data outside the EU

With regard to any transfer of Data to Third Countries, CDP informs you that it will process such data in accordance with the procedures permitted by the applicable laws, such as the consent of the data subject, the adoption of Standard Clauses approved by the European Commission, the selection of entities participating in international programmes for the free movement of data or operating in countries considered safe by the European Commission. Further information may be obtained upon explicit request to the Data Protection Officer (DPO) at the contact details provided.

8. Rights of the data subject

Finally, we inform you that Articles 15-22 of the GDPR give data subjects the possibility to exercise specific rights; the data subject may obtain from CDP: access, rectification, erasure, restriction of processing, withdrawal of consent and the portability of data concerning them.

The data subject also has the right to object to processing. Where the right to object is exercised, CDP reserves the right not to act on the request and therefore to continue processing where there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

The above rights may be exercised by sending a request by post to Cassa Depositi e Prestiti S.p.A., Piazza Verdi n. 10, 00198, Roma, to the attention of the Data Protection Officer, or by e-mail directly to said Officer, at the addresses provided in point 1.

The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).