



## Information notice for customers

### 1. Data Controller

Pursuant to European Regulation 2016/679 (hereinafter GDPR), Cassa Depositi e Prestiti S.p.A. (hereinafter CDP), with its registered office in Rome, via Goito n. 4 (00185), processes your personal data as the "Data Controller" in accordance with the provisions of the law and is informing you about the use of such personal data.

The Personal Data Protection Officer can be contacted at the following email address [privacy@cdp.it](mailto:privacy@cdp.it).

### 2. Sources and type of data processed

Personal data held by CDP are collected from customers directly, including via the use of remote communication techniques (such as the website and the web services within it), or from third parties, for example General Government, Public Registers, Chambers of Commerce, Databases of private companies.

If 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 when the data is registered, or, in any case, no later than the first communication.

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. Furthermore, in complying with specific requirements relative to the 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 within the scope of CDP's normal activities, according to the following purposes.

- a) Purposes strictly connected with and instrumental to the establishment and management of relations with the customers (e.g.: acquisition of information preliminary to the signing of a contract, execution of operations on the basis of the obligations arising from contracts signed by the customers, etc.) pursuant to art. 6 paragraph 1 letter b) GDPR.
- b) Purposes deriving from legal obligations, regulations, EU law, provisions issued by authorities authorised for the purpose by the law or by supervisory and control bodies (in the case, for example, of the so-called "Money laundering" regulation which requires appropriate checks on the customers, compliance with the directives issued by the Bank of Italy in relation to credit activity) pursuant to art. 6 paragraph 1 letter c) GDPR

Provision of personal data for the above purposes is necessary to finalise, carry out or continue the contract relationship with CDP.

- c) Purposes related to CDP's promotion and commercial information activities, for which the customer is entitled to provide or decline consent pursuant to art. 6 paragraph 1 letter a) GDPR.

Provision of the data for the purposes specified in point c) is optional and the relative processing is subject to consent being provided. Failure to provide consent to the processing will impede the promotion activity in question but will not in any way be prejudicial to the Data Subject.

### 4. Data processing method

In relation to the purposes specified, the personal data are processed by means of manual, IT and telematic instruments using logic appropriate for the purposes and, in any case, in order to guarantee the security and confidentiality of said data. Protection is also ensured in the presence of innovative instruments introduced by CDP.

### 5. Storage of personal data

Your personal data will only be stored for the time necessary for the purposes for which they are collected, in accordance with the principle of minimisation pursuant to art. 5.1.c) GDPR and, with reference to promotional and marketing purposes, for a period of time not exceeding 24 months.

CDP may also store some data after the termination of the relationship, according to the time necessary for carrying out specific contractual or legal requirements and for administrative, fiscal and/or contributory purposes, for periods of time imposed by laws and regulations in force, and for the time necessary to assert any legal claims.

In any case, the data are not only processed in compliance with the current law but also according to principles of confidentiality inherent in the performance of financial activity, on which CDP has always based its operations.

### 6. Categories of entities with whom your data may be shared

In the pursuit of the above purposes, CDP may share your personal data with third parties if said data communication operations are instrumental to the services requested and provided.

Your data may be shared with managers of private credit information systems.

Your data may also be shared with guarantors, if relevant to the existing guarantee relationship.

Your data may also be shared with companies forming part of the group, for administrative and accounting purposes, and to third parties in compliance with legal requirements.

Other than these cases, CDP needs to communicate your personal data to external parties in the following categories:

- subsidiary or affiliate companies;
- public or private subjects that take on financial risks for the purpose of prevention of insolvency risk as established by the law;
- entities that carry out banking, financial and insurance services, including subjects involved in the management of payment systems, tax offices and treasuries;
- entities that provide services for management of the IT system, including the CDP website, web applications and telecommunications networks (including email);
- entities that carry out activities of transmission, enveloping, transport and handling of communications with the customers;
- entities who carry out archiving and storage activities, including IT, of the documentation relative to relations with the customers;
- credit collection companies;
- persons, companies, associations or professional practices that provide services or assistance and consulting activities to CDP, with particular but not exclusive reference to accounting, administrative, legal, fiscal and financial questions;
- entities who perform control, auditing and certification of the activities carried out by CDP also in the interests of the customers;
- companies that organise securitisation operations pursuant to law n. 130/99, in all its aspects and operating phases

The entities belonging to the aforementioned categories perform the function of Data Supervisor or operate totally autonomously as distinct Data Controllers.

#### **7. Transfer of data outside the EU**

With regard to any transfer of the Data to third countries, 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 programmes for the free circulation of data (e.g. EU-USA *Privacy Shield*) or operating in countries considered safe by the European Commission. Further information can be obtained by explicit request to the Personal Data Protection Officer at the contacts indicated.

#### **8. Rights of the Data Subject**

You are informed that art. 15-22 GDPR entitle the Data Subjects to exercise specific rights; the Data Subject can obtain from CDP: access, rectification, erasure, restriction of processing, withdrawal of consent, and portability of the data concerning him/her. The Data Subject also has the right to object to the processing. In the event of the right of objection being exercised, CDP reserves the possibility of not following up the request, and therefore continuing the processing, if there are binding legal grounds for proceeding with the processing overriding the interests, rights and freedoms of the Data Subject.

The above rights can be exercised by sending a request by post to Cassa depositi e prestiti S.p.A., via Goito, n° 4, 00185 - Rome, att. Personal Data Protection Officer, or by email directly to said Officer, via the contacts provided in point 1.

The Data Subject also has the right to raise complaints with the Italian Data Protection Authority.



Messrs

Cassa depositi e prestiti S.p.A  
Via Goito, 4  
00185 – ROME

**CONSENT FOR PROCESSING PERSONAL DATA**

The undersigned \_\_\_\_\_,

in view of the information notice received from Cassa depositi e prestiti S.p.A. (below CDP) pursuant to art. 13 of the European Regulation 2016/679

- regarding the promotion/information activity described in paragraph 3 letter c)

consents                       does not consent

to the processing of his/her personal data

The consent given can be withdrawn at any time by writing to the following email address [privacy@cdp.it](mailto:privacy@cdp.it) specifying in the said request the subject-matter and details of the conditions in which said consent had been given.