



BANCA FININT

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PERSONAL DATA PROCESSING AND PROTECTION POLICY – Natural Person

1. Introduction

In accordance with Arts. 13 and 14 of EU Regulation 2016/679, the Bank, in the capacity of "Data Controller" wishes to provide you with some information on the methods and purposes of processing of the personal data of its Customers, including potential, and, in general, the natural persons who represent them (the "data subjects").

2. Data Controller and Data Protection Officer contact information

The Data Controller is Banca Finanziaria Internazionale S.p.A. (in short, Banca Finint), Via Vittorio Alfieri, 1 31015, Conegliano (TV).

To guarantee the best protection of the personal data collected, the Bank has appointed a Data Protection Officer who can be contacted at the address: dpo@bancafinint.com.

3. Purposes and legal basis

The personal data are processed for the following purposes:

ID	Purpose	Legal basis	Categories of data processed (ref. Art. 4)
a)	<i>Provision of services and performance of contracts:</i> Requirement to perform a contract to which you are a party or carry out pre-contractual activities at your request. This requirement represents the legal basis that legitimises the consequent processing.	The legal basis that legitimises the processing derives from a contractual obligation or a requirement necessary to enter into the contract . In the absence of the data, the Bank will be unable to establish the relationships.	Category 1, category 2, category 3, category 4, category 5, category 6
b)	<i>Compliance with national and EU regulatory requirements:</i> Requirement to comply with obligations imposed by laws, regulations and EU legislation as well as provisions imparted by the Supervisory or Control Bodies (e.g. obligations imposed by legislation to combat money laundering, terrorism, tax evasion, etc.).	The legal basis that legitimises the processing derives from a regulatory obligation ; therefore, your consent is not required. In the absence of the data, the Bank will be unable to establish the relationships.	Category 1, category 2, category 3, category 4, category 5, category 6
c)	<i>Provision of services through Web Portal and/or Mobile Applications:</i> Requirement to download and activate the application on smartphones and/or tablets (hereinafter "Mobile APP") and to provide the services requested by the data subject, as well as to guarantee adequate levels of security of the transactions carried out by it.	The legal basis that legitimises the processing derives from a contractual obligation or a legal obligation or a requirement necessary for the provision of the requested service ; in their absence, the Bank may be unable to activate the Apps and provide the requested service.	Category 1, category 2, category 3, category 4, category 6
d)	<i>Payment monitoring:</i> Prevention of any irregularities and default in payments (Early Warning - Default Detection) or debt collection, also in relation to products and services provided without your prior request for loan (e.g. possibility of current account overdraft, deferred payment of payment card balances).	The legal basis that legitimises the processing is the legitimate interest of the Bank; pursuant to the provisions of Art. 21 of the GDPR, the data subject may exercise the right to object.	Category 1, category 2, category 3, category 4, category 6
e)	<i>Fraud prevention:</i> Prevention of any fraud in the payment services provided.	The legal basis that legitimises the processing is the legitimate interest of the Bank; pursuant to the provisions of Art. 21 of the GDPR, the data subject may exercise the right to object.	Category 1, category 2, category 3, category 4, category 6
f)	<i>Direct marketing:</i> Promotion and sale of products and services offered by the Company, including those with which the Bank has signed a specific commercial agreement, including the performance of market research, carried out by the Company's own staff or by third parties appointed as Data Processors.	The legal basis that legitimises the consequent processing is your consent , which you are free to give or not and which you can revoke at any time. The provision of the data necessary for these purposes is not mandatory and refusal to provide them does not entail any negative consequences, except for the impossibility of receiving commercial communications.	Category 1, category 2, category 3, category 4
g)	<i>Communication of data to companies of the Banca Finanziaria Internazionale Group:</i> Sending of your data by the Bank to companies belonging to the Banca Finanziaria Internazionale Group for the purposes of commercial information, market research, sending newsletters, invitations to events, competitions or initiatives with prizes, direct offers of their products or services.	The legal basis that legitimises the consequent processing is your consent , which you are free to give or not and which you can revoke at any time. The provision of the data necessary for these purposes is not mandatory and refusal to provide them does not entail any negative consequences, except for the impossibility of receiving commercial communications.	Category 1, category 2, category 3, category 4
h)	<i>Communication of data to third parties:</i> Sending of your data by the Bank to third companies, not included in the previous point, which may provide services for the purposes of commercial information, market research, sending newsletters, invitations to events, competitions or initiatives with prizes, direct offers of their products.	The legal basis that legitimises the consequent processing is your consent , which you are free to give or not and which you can revoke at any time. The provision of the data necessary for these purposes is not mandatory and refusal to provide them does not entail any negative consequences, except for the impossibility of receiving commercial communications.	Category 1, category 2, category 3, category 4
i)	<i>Profiling:</i> Promotion and sale of "personalised" and "dedicated" products and services of the Bank, of companies of the Banca Finanziaria Internazionale Group and/or of third-party companies. This category includes products and services identified through the	The legal basis that legitimises the consequent processing is your consent , which you are free to give or not and which you can revoke at any time. The provision of the data necessary for these purposes is not mandatory and refusal to provide them does not	Category 1, category 2, category 3, category 4

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processing and analysis, also through the use of automated techniques or systems (e.g. big data), of information relating to preferences, habits, consumption choices, aimed at breaking down the data subjects into groups that are homogeneous in terms of behaviour or specific characteristics (customer profiling), implemented also by enriching data with information acquired from third parties (enrichment).	entail any negative consequences, except for the impossibility of receiving commercial communications.	
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4. Categories of data processed

The personal data processed by the Bank include:

- **Category 1: identification details and personal data** collected as part of the banking relationship:
 - name, surname, place and date of birth, residence, contact information (e.g. mobile number, postal address and e-mail or certified email address);
 - tax data: tax code/VAT number, property regime;
 - information on education (e.g. level of education) and employment (e.g. profession and sector of activity, remuneration, seniority of service, etc.);
 - data relating to identity documents (e.g. number, place, date and issuing body);
 - information relating to the type of digital devices used for any Digital Banking Service, smartphones/tablets (e.g. IP address, serial number, etc.).
- **Category 2: information relating to products and services brokered** by the Bank, owned or used by the customer or in which you have expressed an interest:
 - type of products held, services used (e.g. current account, securities deposit);
 - information on the use of products and services (e.g. balance and movements of the current account or payment cards);
 - information on your property, income and financial situation (e.g. property value, securities/funds portfolio, tax return, mortgage and rent expenses, debt situation with other intermediaries, source of funds).
- **Category 3: information on your behaviour** in relations with the financial services sector:
 - information on events (e.g. protests, foreclosures, etc.) and trends in relations with third party intermediaries (e.g. non-performing loans, overdrafts, etc.);
 - summary assessments (e.g. scoring) issued by third parties (e.g. Crif S.p.A., etc.).
- **Category 4: information on expectations and knowledge** detected, for example, by filling in questionnaires required by law (e.g. Mifid):
 - data suitable for revealing skills, educational qualifications, lifestyle, consumption and savings habits provided in response to questionnaires;
 - macro-needs (e.g. objective of future investments, life projects with a view to understanding which products can be useful over time);
 - browsing cookies on the bank's websites.
- **Category 5: video:**
 - images taken through video surveillance systems installed by the Bank to protect the safety of persons and property and to secure assets.

The Bank could process

- **Category 6: special data** of its customers (suitable for revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data intended to uniquely identify a natural person, data concerning the health or sex life of the individual or the sexual orientation of the individual) in order to carry out specific services and operations requested by them (e.g. payment of membership fees to a political or trade union organisation, purchase of goods or services with credit/debit cards which result in the processing of special data). In such cases, the Bank will ask you for **your consent** to the processing of the special data **necessary to carry out these services and/or operations**.

The Bank wishes to inform the Data Subjects that, in addition to the purposes set out in Section 3 points a) and b), recordings of telephone calls may also be necessary for monitoring the quality of the service rendered to customers (Section 3 point g)). The legal basis that legitimises the processing is your **consent**, which will be requested from time to time by means of a specific message.

5. Data processing methods

The personal data are processed by means of the operations indicated in Art. 4, no. 2) of the GDPR and specifically: data collection, recording, organisation, storage, consultation, processing, alteration, selection, extraction, comparison, use, restriction, disclosure, erasure and destruction. The personal data are processed both on paper and electronically and/or in an automated manner.

With reference to that latter circumstance, we note that for the conclusion and performance of some of the contracts, if necessary, the Bank may make decisions based upon automated data processing (including profiling). In particular, the automated processing will take place with reference to the following purposes:

- Assessment of the customer's money laundering risk profile;
- Classification of customers for the purposes of banking transparency regulations;
- Assessment of the adequacy, consistency and usefulness of the products offered by the Bank to customers;
- Assessment of profiles of adequacy and appropriateness of the investment services and products offered by the Bank to customers.
- Creditworthiness assessment (credit scoring).

6. Personal data recipients or categories of recipients

6.1 The personal data collected may be disclosed to/shared with:

- companies belonging to the Banca Finanziaria Internazionale Group, on the basis of the provisions of anti-laundering regulations (see Art. 39, paragraph 3, of Italian Legislative Decree No. 90/2017), which allows for the exchange of personal data regarding reports on operations considered suspicious between financial intermediaries belonging to the same Group;
- companies belonging to the Banca Finanziaria Internazionale Group in order to guarantee the necessary controls and activities that the Control Functions are required to carry out in accordance with applicable legislation;
- entities (e.g. administrative, legal, supervisory and control authorities) to which the disclosure must be made in compliance with an obligation envisaged by law, a regulation or EU legislation;
- banking and financial intermediaries in order to execute orders given by customers and to regulate the fees envisaged by the contracts concluded with the same;
- third parties, suppliers of products and/or services, such as IT service companies, companies that handle data entry, storage and archiving of documentation related to the services provided, advisory companies, independent professionals, auditing firms, debt collection companies;
- third parties with which commercial agreements have been signed for the purposes indicated in Section 3 points g) and h);
- credit information companies to which positive and negative payment information may be disclosed in accordance with the Code of professional ethics and proper conduct for information systems managed by private parties on consumer credit, reliability and payment punctuality;





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- to entities to which the disclosure may be made, where this is necessary to perform the obligations arising from a contract to which the data subject is party or to fulfil, prior to the conclusion of the contract, specific requests made by the data subject (e.g. issue of credit/debit cards, management of payment services, execution of company registration reports, custodian bank, etc.).
- 6.2 The detailed list of parties to which the data may be disclosed and which act in the capacity of Autonomous Data Controllers or Data Processors, can be consulted at the Bank.
- 6.3 As part of the Bank's internal organisation, your data may also be known by employees, temporary workers and interns in the capacity of data processors.

7. Transfer of data to third countries

The Bank informs you that your personal data may be transferred to countries even not belonging to the European Union or the European Economic Area (known as "Third Countries") recognised by the European Commission as having an adequate level of personal data protection or, otherwise, only if all service providers located in the Third Country contractually guarantee a personal data protection level adequate to that of the European Union (e.g. by signing standard contractual clauses envisaged by the European Commission) and only if the exercise of the rights of the data subjects is always guaranteed.

8. Personal data protection policy as part of S.W.I.F.T. fund transfer activities

In order to conduct international financial transactions (e.g. a foreign bank transfer) and certain specific domestic transactions (e.g. bank transfers in a foreign currency and/or with a non-resident counterparty) requested by customers, it is necessary to use an international messaging service operated by S.W.I.F.T. The service is operated by S.W.I.F.T. (Society for Worldwide Interbank Financial Telecommunication), with registered office in Belgium (www.swift.com - for data protection policy). The Bank sends SWIFT (owner of the SWIFTNet Fin system) the data relating to the parties carrying out the transactions (such as, for example, the names of the originator, the beneficiary and their respective banks, the banking details, the amount and, if provided, the reason for the payment) and necessary to execute them. At present, the Banks cannot carry out the aforementioned transactions requested by customers, without using this interbank network and without communicating the data indicated above to them.

To supplement the information already provided, the Bank wishes to inform you of two circumstances that have arisen:

- all customer data used to execute the aforementioned financial transactions are currently - for operational security reasons - duplicated, transmitted and temporarily stored by SWIFT in a company server located in the United States of America;
- the data stored on this server can be used in the USA in compliance with local regulations. Competent US authorities (in particular the Department of the Treasury) have had access - and may have further access - to them on the basis of measures deemed adoptable under US legislation on combating terrorism.

The Bank points out that the Data Subject retains the rights referred to in the "Rights of the data subject" section of this policy.

9. Data storage periods

Personal data are kept for the time necessary to manage the contractual relationship and the service requested, or to send reporting and fulfil regulatory obligations. The Bank notes that data on transactions and contractual relationships are usually stored for 10 years, with effect from the end of the relationship, except where the data needs to be stored for longer for the purposes of protection in court or disputes in progress at the date indicated above.

The personal data of customers, with reference to the marketing purposes g) and the profiling purposes i), which require your explicit consent, will also be processed for a further 12 months from the date on which you ceased relations with the Bank.

The personal data of potential customers, with reference to purposes g), h), i) and j), will be kept for a period of 24 months from the date of the last update of the information obtained by you. With reference to the above purposes, both for customers and potential customers, the Bank will comply with the provisions of the Public Register of Oppositions (Italian Presidential Decree No. 26 of 27 January 2022).

At the end of the applicable storage period, personal data relating to Data Subjects will be deleted or stored in a form that does not allow for identification of the Data Subject (e.g. anonymisation), unless their further processing is necessary for one or more of the following purposes: i) resolution of pre-dispute procedures and/or disputes initiated prior to the end of the storage period; ii) to follow up investigations/inspections by internal control functions and/or external authorities initiated prior to the end of the storage period; iii) to follow up on requests by Italian and/or foreign public authorities received/notified to the Bank prior to the end of the storage period.

10. Rights of the data subject

In accordance with Arts. 15 to 22, the Regulation provides you with the possibility of exercising specific rights.

In the capacity of Data Subject, you may exercise, at any time, in relation to the Data Controller, the rights envisaged by the Regulation and listed below, by sending a specific request in writing to the email address privacy@bancafinint.com; by post or registered letter or electronically, to the address Banca Finanziaria Internazionale S.p.A. – Ufficio Clienti, Via Vittorio Alfieri, 1 31015, Conegliano (TV) Treviso, or directly at any branch of the Bank.

In particular, you may obtain:

- confirmation of the existence of processing of personal data relating to you and, in that case, access to those data;
- the rectification of inaccurate personal data and completion of incomplete personal data;
- the erasure of personal data relating to you, in cases where this is permitted by the Regulation;
- the restriction of processing, in the circumstances envisaged by the Regulation;
- the communication, to the recipients to whom the personal data have been disclosed, of requests for rectification/erasure of the personal data and restriction of processing received from the Data Subject, unless this proves impossible or involves disproportionate effort;
- the receipt, in a structured, commonly-used and machine-readable format, of personal data provided to the Data Controller, as well as the transmission of the same to another controller, at any time, even upon the termination of any relationships held with the Data Controller.
- to object at any time to the processing of personal data relating to you: in those cases, the Data Controller must refrain from any further processing, except in circumstances permitted by the Regulation;
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or that significantly affects you in a similar way, unless such a decision:
 - a) is necessary for the conclusion or performance of a contract between the Data Subject and the Data Controller;
 - b) is authorised by the law of the European Union or of the Member State to which the Data Controller is subject;
 - c) is based on the explicit consent of the Data Subject.

In the cases referred to in the aforementioned letters a) and c), you have the right to obtain human intervention from the Data Controller, to express your opinion and to challenge the decision.

The deadline for the response is one (1) month, extendable by two (2) months in cases of particular complexity; in these cases, the Bank provides at least an interim communication within one (1) month. The rights may be exercised, in principle, free of charge; the Bank reserves the right to request a contribution in the case of manifestly unfounded or excessive (even repetitive) requests.

The Bank has the right to request the necessary information for the purposes of identifying the requesting party.

The Data Subject may also lodge a complaint with the Personal Data Protection Authority. The contact details of the Personal Data Protection Authority can be consulted on the website <http://www.garanteprivacy.it>.





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Sender

Name and Surname:

Address:

NDG number:

Place and Date:

To

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Consent for personal data processing

Having regard to the Policy provided to me/us pursuant to Arts. 13 and 14 of the Regulation, I/we acknowledge that my/our Personal Data are being processed for the purposes described in Section 3 "Purposes and legal basis" of the Policy and that I/we am/are aware of my/our rights as described therein. In particular:

- A) with reference to the processing of special categories of personal data, as set out in category 6 of Section 4 "Categories of data processed", necessary to pursue the purposes set out in Section 3 "Purposes and legal basis" of this Policy, understanding that, in the absence of my consent, the Bank will not be able to carry out specific operations or other services or perform the entire contract:

I/we express consent

☐ YES

☐ NO

- B) with reference to the processing, by the Bank, of my/our data for direct marketing purposes (as stated in letter f) of Section 3 "Purposes and legal basis" for the categories of data: 1, 2, 3 and 4 as well as indicated in Section 4 "Categories of data processed"):

I/we express consent

☐ YES

☐ NO

- C) with reference to the processing, by the Bank, of my/our data for the data communication purposes to companies belonging to the Banca Finanziaria Internazionale Group (as stated in letter g) of Section 3 "Purposes and legal basis" for the categories of data: 1, 2, 3 and 4 as indicated in Section 4 "Categories of data processed"):

I/we express consent

☐ YES

☐ NO

- D) with reference to the processing, by the Bank, of my/our data for data communicating purposes to third-party companies, not included in the previous point (as stated in letter h) of Section 3 "Purposes and legal basis" for the categories of data: 1, 2, 3 and 4 as indicated in Section 4 "Categories of data processed"):

I/we express consent

☐ YES

☐ NO

- E) with reference to the processing, by the Bank, of my/our data for the purpose of profiling for offers of "personalised" products and services as stated in letter i) of Section 3 "Purposes and legal basis" for the categories of data: 1, 2, 3 and 4 as indicated in Section 4 "Categories of data processed"):

I/we express consent

☐ YES

☐ NO

Signature 1:

Banca Finanziaria Internazionale S.p.A. in breve Banca Finint S.p.A.

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In addition, in relation to the payment services involved in the current account contract, I/we acknowledge that my/our data will be processed for the performance of the services envisaged in the "PSD framework agreement" (payment services), in the awareness that the lack of consent prevents the execution of the requested services.

I/we express consent

☐ YES

☐ NO

Signature 2:

Banca Finanziaria Internazionale S.p.A. in breve Banca Finint S.p.A.

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