



DATA PROTECTION NOTICE

INTRODUCTION

We take the protection of your personal data very seriously.

The BNP Paribas Group, of which BNL is a part, has in fact adopted specific rules on the protection of personal data in its "Personal Data Protection Charter", which can be consulted on the bnl.it website.

BNL S.p.A., headquartered in Rome, viale Altiero Spinelli 30 ("We"), as the data controller, is responsible for the collection and processing of your personal data that it carries out as part of its activities.

Our goal is to help our customers - individuals, entrepreneurs, small and medium enterprises, large companies and institutional investors - in their daily banking activities and in the realisation of their projects thanks to our financing, investment, savings and insurance solutions.

We are part of an integrated banking-insurance Group and, in cooperation with the various Group companies, we provide our customers with a complete range of banking, insurance and leasing products and services.

The purpose of this data protection notice is to let you know how we process your personal data and how you can control and manage them.

1. ARE YOU THE ADDRESSEE OF THIS DATA PROTECTION NOTICE?

This data protection notice applies to you if you are:

- a customer of ours and/or have an existing contractual relationship with us;
- a person interested in our products or services (hereinafter "Prospect") and you provide us with your personal data in order to enter into a relationship with us (at an agency, on our websites and apps).

If in your relationship with us it is necessary for you to provide us with personal data of third parties, please do not forget to inform these parties of the disclosure of their personal data and invite them to read this data protection notice. We will also inform them where possible (for example, if we have their contact details).

2. HOW CAN YOU CONTROL THE PROCESSING OF YOUR PERSONAL DATA?

You have rights, described in more detail below, which you can exercise to significantly control your personal data and the processing of the same by us.

If you intend to exercise your rights, you can send your request to the following address: dirittiprivacy@BNLmail.com or dirittiprivacy@pec.bnlmail.com, attaching a copy of your identity document. You can also use the form available on our website bnl.it, privacy section.

In addition, if you have any questions regarding the processing of your personal data in accordance with this data protection notice, please contact our Data Protection Officer at the following e-mail address: dataprotectionofficer@BNLmail.com.

2.1 You can request to have access to your personal data

If you wish to have access to your personal data, we will provide you with a copy of the data you have requested and information about its processing. We inform you that you can, at any time, obtain a copy of certain personal data concerning you in the private area of your Internet banking.

Your right of access may be limited in cases provided for by the law or applicable regulations. For example, this is the case when legal provisions relating to anti-money laundering and combating the financing of terrorism prohibit giving direct access to personal data processed for this purpose.

2.2 You can ask for the correction of your personal data

Where you believe that your personal data are incorrect or incomplete, you may request that such data be amended or supplemented accordingly. In some cases, you may be asked for supporting documentation.

2.3 You may request deletion of your personal data

If you wish, you can request the deletion of your personal data, within the limits provided by law and in cases where storage is not necessary in relation to the purposes for which they were collected and are processed.

2.4 You can object to your personal data being processed on the basis of our legitimate interests

If you do not agree with the processing of your personal data based on our legitimate interests, you may object, at any time, for reasons related to your particular situation, by indicating the processing activity to which you refer and the reasons for your objection. We will therefore no longer process your personal data unless there are legitimate grounds for doing so or the processing is necessary for the establishment, exercise or defence of our rights in court.

2.5 You can object to the processing of your personal data for marketing purposes

You have the right to object at any time to the processing of your personal data for marketing communication purposes, including profiling related to such purposes.

2.6 You can restrict the processing of your personal data

If certain conditions are met, you have the right to obtain the restriction of the processing of your data if it is not relevant for the continuation of the contractual relationship or if it is required by law.

2.7 You have rights against an automated decision

In general, you have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect or significantly affects you. However, we may take an automated decision if it is necessary for entering into or performing a contract with us, if it is authorised by an Italian or European Union law or if you have given your consent.

In any case, you have the possibility to contest the decision, express your opinions and ask for the intervention of a person who can review the decision.

2.8 You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.

Please note that in the private area of your Internet banking, you can, at any time, review your choices and change them.

2.9 You can request the portability of part of your personal data

You may request a copy of the personal data you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that this copy be transmitted to third data controllers specified by you.



2.10 How to lodge a complaint with the Data Protection Authority

In addition to the rights mentioned above, you can lodge a complaint with the competent supervisory authority (which is usually the one in your place of residence); in Italy you should contact the Data Protection Authority.

3. WHY AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

The purpose of this section is to explain why we process your personal data and the legal basis we adopt.

3.1 Your personal data are processed in order to comply with legal obligations to which we are subject

We process your personal data where necessary to enable us to comply with the regulations to which we are subject, including banking and financial regulations. We process your personal data to:

- manage and report risks (financial, credit, legal, compliance or reputational, etc.) to which BNL (and the BNP Paribas Group to which BNL belongs), may be exposed in the course of its business;
- record, in accordance with the Markets in Financial Instruments Directive (MIFID 2), communications in any form relating, at least, to proprietary trading and the provision of services relating to client orders, in particular their reception, transmission and execution;
- assess the adequacy and suitability of the investment services provided to each client in accordance with the regulations on markets in financial instruments;
- contribute to the fight against tax fraud and fulfil tax control and reporting obligations;
- record transactions for accounting purposes;
- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent corruption;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- exchange and report on various operations, transactions or orders;
- respond to an official request from a duly authorized local or foreign financial, tax, administrative, criminal or judicial authority, arbitrators or mediators, law enforcement agencies, government agencies or public bodies.
- monitor operations and transactions to identify those that deviate from normal routine/customary practice (e.g. when withdrawing a large sum of money in a country other than the place of residence).

3.1.1 Processing of your personal data for anti-money laundering and anti-terrorist financing purposes

We also process your data to prevent money laundering and terrorist financing.

You should also be aware that we are part of a banking group that must not only have a strong AML/FT system in place locally, but that it must also be managed centrally, in a regulatory environment where local, European and international sanctions apply.

In this context, we are also joint data controllers with BNP Paribas SA, the parent company of the BNP Paribas Group; the processing activities carried out under joint control, in order to comply with these legal obligations, are detailed in the annex "Processing of personal data for anti-money laundering and anti-terrorist financing purposes".

3.2 Your personal data are processed in order to perform a contract to which you are party or pre-contractual measures adopted at your request

Your personal data are processed when it is necessary to enter into or perform a contract in order to:

- define your credit risk score and solvency;
- assess whether we can offer you a product or service and under what conditions (e.g. pricing);
- provide you with products and services in accordance with the contract signed;
- recover any debts owed to the bank (identification of customers with unpaid debts);
- respond to your requests and provide you with assistance;
- assist you in managing your assets by automatically categorizing your transaction data;
- communicate with you through the bank's various channels in order to provide you with service communications relating to your relationship with BNL.

3.3 Your personal data are processed to satisfy our legitimate interest or that of third parties

Where we base a processing activity on a legitimate interest, we balance this against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. Therefore, during our business as a bank, we process your personal data on the basis of legitimate interest to:

- manage the risks to which we are exposed:
 - have proof of transactions and operations carried out by you, including electronic evidence;
 - management, prevention and detection of fraud;
 - debt collection;
 - management of legal claims, complaints and defense in case of litigation;
 - development of individual statistical models to define your solvency;
- improve cybersecurity, manage our platforms and websites and ensure business continuity;
- improving the automation and efficiency of our operational processes and customer services through the various banking channels (including service channels), by collecting and reviewing, also for training purposes, personal data and information acquired as part of our interactions with you through all contact systems such as phone calls, e-mails or chats. In particular, this activity may also be carried out through the analysis of the text of e-mails and chats with the identification of keywords, in order to identify minimum information such as the frequency of contacts and interactions that we have had with you, the main reasons for contact (request for assistance, complaint, request for information). In addition, "sentiment analysis" activities may be carried out by re-listening to phone calls (processing of audio tracks, with analysis of the tone of voice and audio frequency, without processing the timbre of the voice, thus excluding the processing of biometric data). In any case, special data such as health data, political, religious and sexual orientation data will not be processed, by adopting specific masking techniques;
- carry out financial transactions such as sales of debt portfolios, securitizations, financing or refinancing of positions held by BNL or the BNP Paribas Group;
- conducting statistical studies and developing predictive and descriptive models, including through the preparation of specific reports, to:



- segmenting customers;
 - commercial purposes: identifying and analyzing the ways in which customers use the products, services and functionalities offered and used in order to develop our commercial policy, identify new trends among our customers and create new offers;
 - security purposes: preventing potential incidents and improving security management;
 - compliance purposes (such as anti-money laundering and anti-terrorist financing) and risk management;
 - anti-fraud purposes.
- to detect and analyze the degree of customer satisfaction on the quality of services rendered through activities carried out directly by BNL or through the support of specialized companies; questions will be asked through the various contact channels used by the bank, such as telephone interviews with an operator or without an operator, sending e-mails, app messages, etc.

3.3.1 We process your personal data in order to send you commercial offers by e-mail, by paper mail and by telephone with an operator

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs. Once you have become a client of ours and unless you object, we may send you communications relating to our products and services and those of the Group, provided that they are similar to those you have already signed up for, in order to better meet your needs.

This promotion, unless you object, may be carried out through:

- e-mail (if the e-mail address was provided by you when a product/service was sold by us);
- telephone calls with an operator;
- paper mail.

If you are a Prospect, we may communicate about BNL's products and services similar to those in which you have expressed an interest by telephone call with operator and paper mail, unless you object.

We will ensure that these commercial offers relate to products or services that are relevant to your needs and complementary to the products and services you already have or in which you have expressed an interest, thereby ensuring a balance between our respective interests.

3.3.2 We analyse your personal data to perform standard profiling in order to customize our products and offers

In order to improve your experience and satisfaction, we need to determine which customer group you belong to. For this purpose, we build a standard profile of you by taking into account the following information:

- those you have communicated directly to us during our interactions or when subscribing to a product or service;
- those resulting from your use of our products or services, such as those relating to your accounts, such as your balance, regular or atypical transactions, use of your card abroad;
- minimal from your use of our various channels: websites and apps (e.g. if you are digitally proficient, which customer journey you prefer to subscribe to or use our products or services).

BNL may carry out standard profiling unless you object.

Please also note that if you give your specific consent, as set out below, we may be able to meet your needs even better by tailoring our offer.

3.4 Your personal data are processed with your consent

In order to carry out certain processing of your personal data, we need your consent, which can be revoked at any time.

In particular, we ask for your consent to:

3.4.1 Tailor-made customization of our offers, products and services based on more sophisticated profiling to anticipate your needs

In particular, we process your personal data, also through electronic processing, in order to identify your specific behaviors and habits, so that we can improve our products, services and offers so that they are always in line with your preferences and needs. This activity is carried out:

- enriching, from external sources and to the extent permitted by law, the data you have provided to us and which we have collected during our relationship and on the various occasions of interaction with you;
- analyzing your habits and preferences expressed by you on the various channels (visits to our branches, e-mails or messages, visits to our websites, use of BNL software installed by you, such as apps);
- assessing the performance of your relationships (including credit relationships);
- analyzing the products you already own and your transactions, including online;
- analyzing the data relating to your position detected through various methods (e.g. ATM withdrawal location, operator where you make a payment transaction, agency where you went);
- enriching the information we have about you with information collected as a result of your browsing of websites and apps, as long as you have given your consent to the installation of tracking systems in accordance with the specific notice to which you are referred;
- re-listening to phone calls and performing a semantic analysis of exchanges with you (e.g. via e-mail and chat). "Sentiment analysis" may also be carried out: in particular, the association with one or more emotions will be made by examining the chat and e-mail traces (transcription of the call and semantic analysis of the text) and by re-listening to the phone calls (processing of the audio tracks, with analysis of the tone of voice and audio frequency, without processing the timbre of the voice, thus excluding the processing of biometric data). In any case, no special data such as health, political, religious or sexual orientation data are processed by adopting specific masking techniques.

3.4.2 Performing promotional and sales activities for the products and services of BNL and third companies, including those belonging to the BNP Paribas Group, and carrying out statistical surveys and market research (including with the help of specialized companies engaged by BNL)

In particular, with regard to promotion and sales activities, if you are one of our Customers, these may be performed:

- if they relate to products/services of BNL and the BNP Paribas Group that are similar to those that you own, through automated methods of contact (such as, for example, calls without the intervention of operators, faxes, mms, sms, forms of interaction that technological innovation will make available, etc.). We remind you that for the same activities with traditional means of contact the legitimate interest applies;
- if relating to products/services of BNL and the BNP Paribas Group not similar to those you own and of third parties not belonging to the BNPP Group, through traditional means of contact (such as, for example, paper mail and calls through operators) and automated means as described above.

If you are a Prospect, with your consent, we may send you commercial communications relating to products/services of BNL and the BNP Paribas Group and of BNL's trusted business partners, through automated contact methods (such as, for example, calls without the intervention of operators, telefaxes, mms, sms, forms of interaction that technological innovation will make available, e-mails, etc.). This is



without prejudice to the fact that, for products similar to those in which you have expressed an interest, we may send you (on the basis of our legitimate interest) commercial communications by post and by telephone call with an operator.

3.4.3 BNL may disclose your personal data to third companies, including those belonging to the BNP Paribas Group, which will process them as independent data controllers.

In particular, we may disclose your contact details, the products you have with us and the customer profile to which you belong (derived in accordance with the legal basis detailed above for profiling, which they will process as independent data controllers) to these companies for the purposes of commercial information, statistical surveys, market research, direct offers of their products and services, carried out through automated and traditional methods of contact.

Further consent to the processing of your personal data may be required where necessary to enable us to process your personal data for purposes other than those stated above.

4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and process your personal data, i.e. any information that identifies you or allows you to be identified, depending on the type of products or services we provide to you and for the various purposes described above.

In particular, we collect and process various categories of personal data, including:

- **identifiers and personal data:** e.g. first and last name, gender, place and date of birth, nationality, identity card number, passport number, driver's license number, vehicle registration number, photograph, video footage as part of specific consultancy services, signature;
- **contact information:** e.g. postal address (private or professional), e-mail address, telephone number;
- **information about your family's financial status:** e.g. marital status, marriage status, number of children and age, children's education or employment, composition of the household, property you own (flat or house);
- **important milestones in your life:** e.g. have you recently married, divorced, become a partner or become a parent;
- **lifestyle:** hobbies and interests, travel, your lifestyle;
- **economic, financial and tax information:** e.g. tax code, tax status, country of residence, salary and other income, value of your assets;
- **education and employment information:** e.g. level of education, occupation, name of employer and salary;
- **banking and financial information about the products and services you own:** e.g. bank account details, products and services owned and used (credit, insurance, savings and investments, leasing, home protection), credit card number, assets, declared investor profile, credit history, solvency problems;
- **transaction data:** account transactions and balances, money transfers made, transactions, including beneficiary data such as full names, addresses and contact details, as well as details of bank transactions, amount, date, time and type of transaction (credit card, bank transfer, cheque, direct debit);
- **data about your habits and preferences in relation to the use of our products and services;**
- **data collected from our interactions with you:** e.g. your comments, suggestions, needs collected as part of our interactions through all contact systems available to us (e.g. in person at our agencies, telephone communications, e-mail exchanges, chatbots, exchanges on our social media pages and your complaints). We may also process your connection data and information acquired when you navigate our websites and apps by means of cookies and other tracking tools, as indicated in the specific information on cookies and in the profiling with consent section;
- **data relating to your location (so-called geolocation)**
- **data relating to the devices you use (mobile phone, computer, tablet, etc.):** IP address, technical specifications and unique identification data (IMEI code);
- **personalized access credentials or security features used to connect you to BNL's website and apps;**
- **judicial data (for the pursuit of anti-money laundering, anti-terrorism and embargo activities).**

Where we have to process categories of data other than those indicated above, you will be provided with appropriate information, highlighting the legal basis and the purpose of the processing, possibly obtaining specific consent where necessary (e.g. in the case of processing of data relating to your health).

5. FROM WHOM DO WE COLLECT PERSONAL DATA?

In general, we collect personal data directly from you; however, we may also collect personal data from other sources.

Sometimes we collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g. the Official Journal of the Italian Republic, the Trade and Companies Register, databases operated by financial sector supervisory authorities);
- websites/social media pages of legal entities or professional clients containing information that you have disclosed (e.g. your website or social media page);
- public information such as that published in the press.

We also collect personal data from third parties (where the legal requirements for disclosure to us exist):

- from other BNP Paribas Group entities;
- from our customers (companies or individuals)
- from our business partners;
- from third parties such as credit reference agencies and fraud prevention agencies;
- from data brokers who are responsible for ensuring that relevant information is collected in a lawful manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

6.1. With companies in the BNP Paribas Group

As part of the BNP Paribas Group, BNL works closely with other BNP Paribas Group companies around the world. Your personal data may therefore be shared between these companies, where necessary, in order to:

- comply with our various legal and regulatory obligations described above;
- satisfy our legitimate interests which are:



- to manage, prevent, detect fraud;
- to carry out statistical studies and develop predictive and descriptive models for business, security, compliance, credit risk management and anti-fraud purposes, using data minimization measures;
- to improve the accuracy of certain data relating to you processed by companies in the BNP Paribas Group. In particular, data sharing will take place when necessary to fulfil legal obligations incumbent on the various entities (including for anti-money laundering purposes by sharing your anti-money laundering profile at group level with a view to a centralized and shared control of risk) and to always have accurate and up-to-date data (e.g. contact details where it is necessary for an entity to contact you).

6.2. With recipients outside the BNP Paribas Group and with BNL's data processors

In order to fulfill some of the purposes described in this data protection notice, we may, where necessary, share your personal data with:

- data processors who perform services on our behalf (e.g. IT services, logistics, debt collection, consulting and distribution and marketing, storage services) and with whom BNL has defined specific obligations regarding the processing of personal data;
- banking and business partners, independent agents, brokers or intermediaries, financial institutions, counterparties, with whom we have dealings:
 - if such disclosure is necessary to enable us to provide you with services and products or perform our contractual obligations or transactions (e.g. banks, correspondent banks, custodians, issuers of securities, paying agents, foreign exchange platforms, insurance companies, payment system operators, payment card issuers or intermediaries, mutual guarantee companies or financial guarantee institutions);
 - to enable you to take advantage of the services/products jointly offered under the partnership (e.g. we may notify you of the opening of the relationship with us if necessary for the Partner to offer you dedicated services that fall within the scope of the partnership from which you wished to benefit);
 - if you have given your consent to the communication of your data to these categories of entities for marketing purposes for their products and services;
- local or foreign financial, tax, administrative, criminal or judicial authorities (where their jurisdiction may also be deemed to apply locally), arbitrators or mediators, public authorities or institutions (such as the Bank of Italy, AGCM, the Data Protection Authority), to whom we or another company of the BNP Paribas Group must disclose your data in order to:
 - respond to a request from them
 - protect a right of ours in court or in the course of a procedure
 - comply with a regulation or recommendation issued by a competent authority which applies to us or any member of the BNP Paribas Group if it affects us and to the extent required by law;
- third party payment service providers (information about your bank accounts) for the purpose of providing a payment order service or account information if you have consented to the transfer of your personal data to such third party;
- certain professionals such as lawyers, notaries or auditors when necessary in specific circumstances (litigation, auditing, etc.), as well as to our insurers or to the actual or potential buyer of business units or receivables for the purposes of appropriate evaluations and carrying out the activities necessary to define/close the corporate transaction.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In the case of international transfers of personal data from the European Economic Area (EEA) to a non-EEA country, the transfer may take place if the European Commission has determined that a non-EEA country provides an adequate level of data protection: in this case, your personal data may be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognized as adequate by the European Commission, we will rely on an exemption applicable to the specific situation (e.g. if the transfer is necessary in order to perform our contract with you, for example when making an international payment) or by implementing one of the following safeguards to ensure the protection of your personal data:

- standard contractual clauses approved by the European Commission;
- binding corporate rules.

To obtain a copy of these safeguards or details of where they are available, you can send a written request as indicated in the section *HOW CAN YOU CONTROL THE PROCESSING OF YOUR PERSONAL DATA?*

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Unless the law imposes specific retention requirements, if you are a customer, we will retain your personal data for the entire duration of the contract and for a further period of:

- 10 years and six months after expiration of the relationship;
- 15 years and six months after expiration of the relationship in the case of loans, credit facilities, mortgages etc

These terms are defined in consideration of the statute of limitations of the rights we may have in relation to which we may need to defend ourselves or of the storage requirements imposed by the law, if the data are necessary to execute the contracts existing between us or to carry out operations ordered/requested by you or to satisfy our legitimate interest.

We will process your personal data for marketing and profiling purposes for as long as we have a relationship with you and for a further period of 12 months, unless detailed legislation defines shorter periods.

If you have not entered into a relationship with us (i.e., you are a Prospect), with reference to your data necessary for the entering into a relationship, in case said relationship is not perfected, we will retain your data for a maximum of 12 months to enable us to respond to your specific requests, unless this period is extended by law.

We will also process your data for the other purposes set out in this notice for a maximum period of 12 months from your last contact with BNL.

For further information on retention periods, please consult the Privacy section of our website <https://bnl.it>.

9. HOW TO FOLLOW THE EVOLUTION OF THIS DATA PROTECTION NOTICE?

In a world where technologies are constantly evolving, we regularly review this Data Protection Notice and update it as necessary.

We encourage you to review the latest version of this document online and will notify you of any significant changes through our website or through our standard communication channels.



Annex

Processing of personal data to combat money laundering and terrorist financing

Data Protection Notice Joint controllers

in accordance with Article 13, Regulation (EU) 2016/679 ("GDPR")

Introduction

BNL belongs to the BNP Paribas Group, which must have in place a strong, centrally governed, entity-wide anti-money laundering and anti-terrorist financing (AML/FT) system, an anti-corruption mechanism, as well as a mechanism for compliance with International Sanctions (this includes all economic or trade sanctions, including all laws, regulations, restrictions, embargoes or freezing of assets, decreed, regulated, imposed or implemented by the Italian Republic, the European Union, the United States Treasury Department, the Office of Foreign Resources Control, and any competent authority in the territory where we are established). With this notice, therefore, as joint controllers, we wish to describe the purposes for which we collect and process your personal data, list which categories of data are processed, indicate what your rights are and how they can be exercised. This notice relates to the processing carried out in the specific context listed above.

1. WHO ARE THE JOINT CONTROLLERS

In this context, BNL S.p.A. with headquarters in Rome, viale Altiero Spinelli 30, and BNP Paribas SA with headquarters in Paris, 16 rue de Hanovre, the parent company of the BNP Paribas Group (the term "we" used in this section therefore also includes BNP Paribas SA) are joint controllers.

2. HOW TO CONTACT THE DATA PROTECTION OFFICERS

BNL S.p.A., headquartered in Rome, Viale Altiero Spinelli, 30, website <https://bnl.it>, e-mail address to which you can write to exercise your rights: dirittiprivacy@BNLmail.com; dirittiprivacy@pec.BNLmail.com. In accordance with Article 38 GDPR, we also provide you with the contact details of the Data Protection Officer (DPO), who can be reached at the e-mail address dataprotectionofficer@BNLmail.com.

BNP Paribas SA, headquartered in Paris 16 rue de Hanovre, website: www.bnpparibas.it. If you have any questions regarding our processing of personal data in accordance with this data protection notice, please contact the relevant Data Protection Officer: Permanent Control - Fair Management - Group Communications - ACI code CAT06A1 - 16 rue de Hanovre - 75002 Paris, France.

3. WHY AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

For the purposes of the AML/FT and compliance with International Sanctions, we undertake the processing operations listed below to comply with our legal obligations:

- implement a reasonably designed Know Your Customer (KYC) facility to identify, update and confirm the identity of our customers, including that of their beneficiaries and agents, where applicable;
- implement enhanced identification and verification measures for high risk customers, Politically Exposed Persons " PEPs " (PEPs are persons designated by regulation who, due to their functions or positions (political, jurisdictional or administrative) are more exposed to such risks) as well as high risk situations;
- implement written policies and procedures as well as controls reasonably designed to ensure that the Bank does not enter into - nor maintain - certain relationships with shell banks;
- observe a policy, based on an assessment of risk and economic circumstances, generally not to perform or engage in an activity or business relationship, whatever the currency:
 - on behalf of or for the benefit of any person, entity or organization that is subject to sanctions by the Italian Republic, the European Union, the United States, the United Nations or, in some cases, other local sanctions in the territories in which the Group operates;
 - involving, directly or indirectly, territories subject to sanctions, including Crimea/Sebastopol, Cuba, Iran, North Korea or Syria;
 - involving financial institutions or territories that may be linked to or controlled by terrorist organizations recognized as such by the competent authorities in France, the European Union, the United States or the UN;
- conduct filtering of our customer bases and transactions, reasonably designed to ensure compliance with applicable laws;
- observe systems and processes designed to detect suspicious transactions and make suspicious reports to the relevant authorities; and
- implement a compliance program reasonably designed to prevent and detect bribery and corruption in accordance with the Sapin II Act, U.S. FCPA, and UK Bribery Act.

In this context, we are induced to use:

- services provided by external suppliers such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by suppliers REFINITIV, REFINITIV US LLC and London Bank of Exchanges) which maintain up-to-date lists of PEPs;
- public information available in the press on facts related to money laundering, terrorist financing or acts of corruption;
- knowledge of a risk behavior or situation (existence of a statement of suspicion or equivalent) that can be identified at BNP Paribas Group level.

In particular, for the purposes of carrying out this processing activity, the joint controllers shall jointly process the following categories of data as described in greater detail in the attached data protection notice:

- identifiers and personal data;
- contact details;
- information relating to your family wealth situation;
- important milestones in your life;
- economic, financial and tax information;
- information on education and employment;
- banking and financial information about the products and services you own;
- transaction data.



In order to carry out the activities described above, we may also process special categories of data (if they emerge, for example, from account movements made by you and are subject to analysis in order to identify possible unusual transactions) or judicial data, since the aim is to combat money laundering and the financing of terrorism.

Since the processing is carried out by the joint controllers in order to comply with legal obligations, we do not need your consent. The checks and activities described above and the processing of your personal data related to them are carried out at the beginning of the relationship, but also during the relationship we have with you, also examining the transactions and operations that are performed.

4. HOW YOUR DATA ARE PROCESSED

The processing of your personal data is carried out through the operations specified in Article 4 no. 2 GDPR and precisely: collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, deletion or destruction of data.

The personal data acquired are subject to both paper and electronic processing and, moreover, are processed in full compliance with the law, as well as with the principles of lawfulness, correctness, transparency, non-excessiveness and protection of your confidentiality and your rights.

5. WITH WHOM WE SHARE YOUR DATA

The Joint Controllers may disclose your data to external companies that provide support activities for the development and management of the activities described above, specifically appointed as data processors in accordance with Article 28, GDPR.

In addition, to comply with our legal obligations, we exchange information collected for AML/FT, anti-corruption or international sanctions enforcement purposes between BNP Paribas Group entities. When your data are exchanged with countries outside the European Economic Area that do not have an adequate level of protection, transfers are made in accordance with the European Commission's standard contractual clauses. Where additional data are collected and exchanged in order to comply with regulations in non-EU countries, such processing is necessary to enable BNP Paribas Group and its entities to simultaneously comply with their legal obligations and avoid local sanctions which is in our legitimate interest.

6. HOW LONG WE KEEP YOUR DATA

We retain your data for the purposes of this policy for 10 years and six months from the date of expiration of the relationship or the date on which you are assessed for anti-money laundering and anti-terrorist financing.

7. HOW YOU CAN CONTROL THE PROCESSING OF YOUR PERSONAL DATA

Regarding to the rights that you may exercise (details of which can be found in the notice that we have given you) for these specific purposes, you may send your request to the following address: dirittiprivacy@BNLmail.com or dirittiprivacy@pec.bnlmail.com enclosing a copy of your identity document or send a letter to the following address: www.bnpparibas.it - Permanent control - Fair management - Group communications - ACI code CAT06A1 - 16 rue de Hanovre - 75002 Paris, France.

You may also use the form made available on our website bnl.it, privacy section.

In addition, if you have any questions regarding the processing of your personal data in accordance with this data protection notice, please contact our Data Protection Officer at the following e-mail address: dataprotectionofficer@BNLmail.com.

BANCA NAZIONALE DEL LAVORO SPA