



## PRIVACY POLICY

### INTRODUCTION

**We take the protection of your personal data very seriously.**

BNL SpA based in Rome, viale Altiero Spinelli 30 ("We"), as 'Personal Data Controller', is responsible for the collection and processing of your personal data which it carries out within the scope of its activities.

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

We are part of an integrated banking-insurance group and, in collaboration with the different companies of the group, we provide our clients with a complete range of banking, insurance and leasing products and services.

The purpose of this Privacy Policy is to let you know how we treat your personal data and how you can control and manage it.

### 1. ARE YOU THE RECIPIENT OF THIS PRIVACY POLICY?

This Privacy Policy concerns you if you are a legal representative, attorney, delegate or person connected to a company that has requested the establishment or has established a contractual relationship with us.

If in the relationship you have with us it is necessary that you provide us with personal data of third parties, do not forget to inform these subjects of the communication of their personal data and invite them to read this Privacy Policy. 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, better described below, which you can exercise to significantly control your personal data and the treatment of the same by us.

If you intend to exercise your rights, you can send a specific request to the following address: [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com) or [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com), attaching a copy of your identity document. You can also use the appropriate form made available on our website [bnl.it](http://bnl.it), privacy section.

In addition, if you have any questions relating to the processing of your personal data under this Privacy Policy, please contact our Data Protection Officer at the following email address: [dataprotectionofficer@BNLmail.com](mailto:dataprotectionofficer@BNLmail.com)

#### 2.1 You can request 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 relating to its treatment.

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

#### 2.2 You can request the correction of your personal data

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

#### 2.3 You can request the deletion of your personal data

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

#### 2.4 You can object to the processing of your personal data 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 can object, at any time, for reasons connected to your particular situation, indicating the processing activity to which you refer and the reasons for the opposition. Therefore, we will no longer process your personal data unless there are legitimate reasons to do so or the processing is necessary for the establishment, exercise or legal defense of our rights.

#### 2.5 You can limit the processing of your personal data

Upon the occurrence of certain conditions, you have the right to obtain the limitation of the processing concerning your data if not relevant for the continuation of the contractual relationship or necessary by law.

#### 2.6 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.

#### 2.7 You can request the portability of part of your personal data

You can 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 passed on to third party controllers specified by you.

#### 2.8 How to file a complaint with the Personal Data Protection Authority

In addition to the above rights, it is possible to lodge a complaint with the competent supervisory authority (which is usually that of your place of residence); in Italy you must contact the Guarantor for the protection of personal data.

### 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 is processed to comply with the legal obligations to which we are subjected

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

- manage and report the risks (financial, credit, legal, compliance or reputational, etc.) to which BNL (and the BNP Paribas Group of which BNL is a part) could incur as part of its activities;
- contribute to the fight against tax fraud and fulfill tax control and notification obligations;
- record transactions for accounting purposes;
- detect and prevent corruption;



- comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- exchange and report various trades, transactions or orders;
- respond to an official request from a duly authorized local or foreign financial, tax, administrative, criminal or judicial authority, arbitrator or mediator, law enforcement agency, government agency or public entity;
- monitor your operations and transactions to identify those that deviate from your normal routine/custom (for example when you withdraw a large sum of money in a country other than your place of residence).

### 3.1.1. Processing of your personal data for anti-money laundering and countering the financing of terrorism purposes

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

We also inform you that we are part of a banking group which must not only have a solid anti-money laundering and countering the financing of terrorism (AML/TF) system at the local level, but which must also be managed centrally, in a regulatory environment which provides for the application of local, European and international sanctions.

In this context, we are also joint controllers with BNP Paribas SA, the parent company of the BNP Paribas Group; the processing activities carried out in joint ownership, to fulfill these legal obligations, are detailed in the attachment "Processing of personal data to combat money laundering and terrorist financing".

### 3.2 The yours personal data are processed to give execution of a contract or to a pre-contractual measure of which the company represented by you is a part or by the same request

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

- send communications aimed at recovering any credits from the bank;
- respond to business inquiries made through you and provide you with general assistance in running your business;
- communicate with you through the various bank channels to provide you with service communications relating to the relationships you have with BNL on behalf of your company.

### 3.3 Your personal data is processed to meet the our legitimate interest or third parties

Where we base a processing activity on a legitimate interest, we balance the same with your interests or fundamental rights and freedoms, to ensure that there is a fair balance between them. So, in the course of our business as a bank, we process your personal data on the basis of legitimate interest for:

- manage the risks to which we are exposed:
  - have proof of operations and transactions carried out by you, also with electronic evidence;
  - fraud management, prevention and detection;
  - management of legal claims, complaints and defense in the event of litigation;
- improve information security, manage our platforms and websites and ensure business continuity;
- improve the automation and efficiency of our operational processes and services rendered to customers through the various bank channels (including those of assistance), collecting and examining, also for training purposes, personal data and information acquired in the context of our interactions with you through all contact systems such as phone calls, emails or chats. In particular, this activity can also be achieved through the analysis of the text of the emails and chats with the identification of keywords, to identify minimum information such as, for example, the frequency of contacts and interactions we have had with you, the main reasons for the contact (assistance request, complaint, information request);
- help you manage your budget by automatically categorizing your transaction data;
- conduct statistical studies and develop predictive and descriptive models, also through the preparation of specific reports, to:
  - segment customers;
  - safety purposes: to prevent potential accidents and improve safety management;
  - compliance/compliance purposes (such as anti-money laundering and countering the financing of terrorism) and risk management;
  - anti-fraud purposes.
- proceed to detect and analyze the degree of customer satisfaction (in this case the company you represent) on the quality of services rendered through activities performed 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 or without an operator, sending emails, messages in the app, etc.

We also remind you that, again within the scope of the activities you carry out for your company, BNL retains the right to contact you, also for commercial purposes and based on current legislation, for communications intended for your Company and therefore, for commercial purposes, with regard to the services/products offered to it, in compliance with the current pro-tempore legislation applicable to the Companies.

## 4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT AND PROCESS?

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 your company and for the different purposes described above.

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

- **identification and personal data:** for example name and surname, gender, place and date of birth, nationality, identity card number, passport number, driving license number, vehicle registration number, photograph, video footage in the context of specific services advisory, signature;
- **contact:** for example postal address (private or professional), e-mail address, telephone number;
- **information relating to your family financial situation:** for example marital status, matrimonial regime, number of children and age, study or employment of the children, composition of the family nucleus, assets owned by you (apartment or house);
- **economic, financial and tax information:** for example tax identification number, tax status, country of residence, salary and other income, value of your assets;
- **education and employment information:** for example, level of education, occupation, name of employer, and salary;
- **data collected from our interactions with the company through you:** for example your comments, suggestions, needs collected in the context of our interactions through all the contact systems available to us (e.g. in person in our agencies, telephone communications, e-mail exchanges, chats, chatbots, exchanges on our social media pages and your complaints). Furthermore, your connection data and the information acquired while browsing our websites and apps using cookies and other tracking tools may be processed, as indicated in the specific information on cookies;



- **data relating to the devices you use (mobile phone, computer, tablet, etc.)** to work with us on behalf of your Company: IP address, technical specifications and unique identification data (IMEI code);
- **personalized login credentials or security features used to connect you to the BNL website and apps;**
- **Judicial data (for the prosecution of activities for anti-money laundering, anti-terrorism and embargoes purposes).**

Where we need to process categories of data other than those indicated above, you will be provided with appropriate information.

## 5. WHO DO WE COLLECT PERSONAL DATA FROM?

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

In fact, sometimes we collect data from public sources:

- publications/databases made available by official authorities or third parties (for example the Official Gazette of the Italian Republic, the register of commerce and companies, databases managed by the supervisory authorities of the financial sector);
- websites/social media pages of legal entities or professional clients containing information that you have disclosed (e.g. your own website or social media page);
- public information such as that published in the press.

We also collect personal data from other BNP Paribas Group entities where it serves AML checks.

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

### 6.1. With the company of the BNP Paribas Group

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

- comply with our various legal and regulatory obligations described above;
- satisfy our legitimate interests which are:
  - to manage, prevent, detect fraud;
  - perform statistical studies and develop predictive and descriptive models for business, security, compliance, credit risk management and anti-fraud purposes, adopting data minimization measures;
  - improve the accuracy of some data relating to you processed by the companies of the BNP Paribas Group. In particular, data sharing will take place when necessary to fulfill legal obligations incumbent on the various entities (also for anti-money laundering purposes by sharing your anti-money laundering profile at group level with a view to centralized and shared risk monitoring) and to always have accurate and up-to-date (e.g. contact details where necessary for an entity to get in touch with you).

### 6.2. With recipients outside the BNP Paribas Group and with processor of BNL

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

- data processors who perform services on our behalf (e.g. IT services, logistics, debt collection, consultancy and distribution and marketing, archiving services) and with whom BNL has defined specific obligations regarding the processing of personal data;
- banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties, with whom we have relationships
  - if the communication is necessary to enable us to provide you with services and products or carry out our contractual obligations or transactions (e.g. banks, correspondent banks, custodians, securities issuers, paying agents, exchange platforms, insurance companies, payment processors, issuers or payment card intermediaries, mutual guarantee companies or financial guarantee institutions);
- local or foreign financial, fiscal, administrative, penal or judicial authorities (where their jurisdiction may be deemed applicable also locally), arbitrators or mediators, public authorities or institutions (such as Bank of Italy, AGCM, Guarantor for the protection of personal data), which we or another company of the BNP Paribas Group must communicate to:
  - respond to their request;
  - protect our right in court or in the course of a proceeding;
  - comply with a regulation or recommendation issued by a competent authority that applies to us or to any member of the BNP Paribas Group if it affects us and to the extent permitted by law;
- certain professionals such as lawyers, notaries or auditors when necessary in specific circumstances (litigation, auditing, etc.).

## 7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In case of international transfers of personal data originating from the European Economic Area (EEA) and destined for a non-EEA country, the transfer can take place if the European Commission has recognized 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 a derogation applicable to the specific situation (e.g. if the transfer is necessary 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:

- Clauses standard contracts approved by the European Commission;
- binding corporate rules.

In any case, compliance with the Recommendations 1-2020 of the European Data Protection Board (EDPB) remains valid.

To obtain a copy of these guarantees 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 conservation needs, we keep your personal data for the entire duration of the contract stipulated with the company you represent and for a further term equal to:

- 10 years and six months from the termination of the relationship;
- 15 years and six months from the termination of the relationship in the case of credit relationships such as loans, credit lines, mortgages, etc.

These terms are defined in consideration of the limitation periods of the rights that we could claim in relation to which we may need to defend ourselves or the conservation needs imposed by the law, if it concerns data necessary to execute the contracts existing between us



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and the your company or to carry out operations ordered/requested by you on behalf of your company or to satisfy one of our legitimate interests.

For more information on storage times, please consult the section [Privacy](https://bnl.it) of our website <https://bnl.it>.

#### **9. HOW TO FOLLOW THE EVOLUTION OF THIS PRIVACY POLICY?**

In a world where technologies are constantly evolving, we regularly review this Privacy Policy and update it as necessary. We encourage you to review the latest version of this document online and we will notify you of any significant changes through our website or through our standard communication channels.

Attached

## Processing of personal data to combat money laundering and terrorist financing

### Privacy information co-ownership

pursuant to Articles 13 and 14, Regulation (EU) 2016/679 ("GDPR")

#### Introduction

BNL belongs to the BNP Paribas Group which must have a robust entity-wide, centrally governed anti-money laundering and anti-terrorist financing (AML/FT) system, a centrally governed anti-corruption mechanism, as well as of a device that allows compliance with International Sanctions (this refers to all economic or commercial sanctions, including all laws, regulations, restrictive measures, embargoes or freezing of assets, decreed, regulated, imposed or implemented by the Italian Republic, the European Union, the United States Department of the Treasury, the Office of Foreign Resources Control, and any competent authority in the territory in which we are established). With this information, 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 being processed, indicate what your rights are and the ways in which they can be exercised. This information pertains to the treatment carried out in the specific area listed above.

#### 1. WHO ARE THE JOINT CONTROLLERS OF THE TREATMENT

In this context, BNL SpA based in Rome viale Altiero Spinelli 30 and BNP Paribas SA based in Paris 16 rue de Hanovre, parent company of the BNP Paribas Group (the term «we» used in this section therefore also includes BNP Paribas SA) are joint controllers. Furthermore, for the sharing of data for AML/CFT purposes, the entities of the Group, including the parent company BNP Paribas, have defined as regards the processing of data of natural persons connected to legal entities who are customers of one of the entities of the BNP- Paribas, to be joint data controllers.

#### 2. HOW TO CONTACT DATA PROTECTION OFFICERS

**BNL SpA**, with headquarters in Rome, Viale Altiero Spinelli, 30, website <https://bnl.it>, e-mail address to which to write for the exercise of the rights of the interested party: [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com) or [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com). Pursuant to art. 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](mailto:dataprotectionofficer@BNLmail.com).

**BNP Paribas SA**, based in Paris 16 rue de Hanovre, website: [www.bnpparibas.it](http://www.bnpparibas.it). If you have any questions regarding our processing of your personal data in accordance with this data protection declaration, 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 AML/FT and International Sanctions compliance purposes, we engage in the processing operations listed below to comply with our legal obligations:

- implement a Know Your Customer (KYC) device reasonably designed to identify, update and confirm the identity of our customers, including that of their beneficial owners and their representatives, where applicable;
- implement enhanced identification and verification measures for high-risk customers, Politically Exposed Persons «PPE» (PPEs are persons designated by the regulation who, due to their functions or positions (political, judicial 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 - or maintain - any relationships with fictitious Banks;
- observe a policy, based on an assessment of risks and the economic situation, which generally consists of not carrying out or engaging in an activity or business relationship, whatever the currency:
  - on behalf 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, sanctioned territories, including Crimea/Sevastopol, Cuba, Iran, North Korea or Syria;
  - involving financial institutions or territories that could 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 United Nations;
- carry out filtering of our customer bases and transactions, reasonably designed to ensure compliance with applicable laws;
- observe the systems and processes aimed at identifying suspicious transactions and making suspicious reports to the authorities concerned;
- implement a compliance program reasonably designed to prevent and detect bribery and illicit trading in accordance with the Sapin II Act, US FCPA, and UK Bribery Act.

In this context, we are led to appeal:

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

In particular, for the purpose of carrying out this processing activity, the joint controllers will jointly process the following categories of data as better described in the entry information in relation to which this is attached:

- identification and personal data;
- contact details;
- economic, financial and fiscal information;
- employment information.

For the purpose of carrying out the activities described above, we may also process judicial data since the objective is to fight against money laundering and terrorist financing.

Considering that the treatment is carried out by the joint controllers to comply with legal obligations, we do not need to acquire your consent. The checks and activities described above and the processing of your personal data connected to them are carried out at the start of the relationship, but also during the relationship that we will maintain with your company.

#### **4. WHAT ARE THE METHODS OF PROCESSING YOUR DATA**

The processing of your personal data is carried out by means of the operations indicated in art. 4 no. 2 GDPR and precisely: collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction of data .

The personal data acquired are subjected 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-excess and protection of your privacy and your rights.

#### **5. WHO WE SHARE YOUR DATA WITH**

The Joint Controllers will be able to communicate your data to external companies that provide support for the development and management of the activities described above, specifically appointed as data processors pursuant to article 28, GDPR.

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

#### **6. HOW LONG WE KEEP YOUR DATA**

We keep your data for the purposes of this notice for 10 years and six months from the date the relationship terminated or from the date you were assessed for anti-money laundering and counter-terrorism financing.

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

With reference to the rights that you can exercise (the details of which are in the information we have provided to you) for these specific purposes you can send a specific request to the following address: [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com) or [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com) attaching a copy of a your identity document or send a letter to the following address: [www.bnpparibas.it](http://www.bnpparibas.it) – Permanent control – Fair management – Group communications – ACI code CAT06A1 – 16 rue de Hanovre – 75002 Paris, France.

You can also use the appropriate form made available on our website [bnl.it](http://bnl.it), privacy section.

In addition, if you have any questions relating to the processing of your personal data under this Privacy Policy, please contact our Data Protection Officer at the following email address: [dataprotectionofficer@BNLmail.com](mailto:dataprotectionofficer@BNLmail.com) .