



In accordance with EU Regulation 2016/679 (hereinafter referred to as "GDPR" or "General Data Protection Regulation") and the current national legislation on the protection of personal data (hereinafter, together with the GDPR, referred to as "Privacy Regulations"), Società per Amministrazioni Fiduciarie "Spafid" S.p.A. with registered office in Milan, Via Filodrammatici 10 (hereinafter, the "Company" or the "Controller"), as the Data Controller, is required to provide information regarding the processing of personal data.

The personal data held by the Company is generally collected directly from the data subject and occasionally may come from third parties when their data is acquired through public and private databases (such as land registry/mortgage searches, adverse records/protests, etc.).

The subject of the processing is personal information concerning representatives of legal entities (e.g., administrators, employees, managers, collaborators, consultants of said legal entity), processed at the time of entering into a contract with the Company, as well as during the stages preceding the establishment of the contractual relationship and until its conclusion.

## a) Purpose of the processing and obligation to provide data

All personal data are processed, in compliance with legal provisions and confidentiality obligations, for purposes strictly connected and instrumental to the management of contractual relationships, particularly in relation to the following purposes:

- I. Purposes related to obligations imposed by law, regulations, EU legislation, as well as provisions issued by competent Authorities or Supervisory Bodies. The provision of personal data for these purposes **is mandatory**.
- II. Purposes related and instrumental to the execution of contractual and pre-contractual obligations connected to the establishment and performance of the relationship with the Company. The provision of personal data for these purposes **is mandatory** as it is necessary for the establishment and performance of the contractual relationship with the Company.
- III. Purposes related to corporate events (transfer of the Company or business units), due diligence, or in case of defense of a right in legal proceedings and related preliminary activities, as well as for risk management purposes. If the conditions arise, the data subject may exercise the right of objection as indicated below.

## b) Legal basis

The legal basis for the processing referred to in the previous **point I)** is identified in the fulfillment of legal obligations to which the Company is subject.

The legal basis for the processing referred to in the previous **point II)** is identified in the need to establish and manage the contractual relationship with the Company.

The legal basis for the processing referred to in the previous **point III)** is identified in the legitimate interest of the Company in continuing its commercial activities and protecting its rights, including in the context of fraud prevention.

## c) Processing methods

The processing of your personal data will take place, in compliance with the provisions of Privacy Regulations, using paper, computer, or telematic tools, with logic strictly related to the purposes indicated and, in any case, in a way that ensures their security and confidentiality in accordance with Privacy Regulations. For risk management purposes, telephone conversations or telematic data traffic may be recorded.

## d) Categories of processed data

In relation to the purposes described above, the Company processes the following types of personal data: personal data (such as, for example, name, surname, address, telephone number, email, date of birth, identity card, health card, tax code, marital status, nationality), accounting data, VAT number. Furthermore, information related to events related to the execution of the contract may be processed if they refer directly or indirectly to the data subjects.

## e) Communication and disclosure of data

For the pursuit of the purposes described in the previous **point a)**, the personal data collected by the Company may be processed by its employees, consultants, and collaborators acting as authorized/encharged of processing in relation to their assigned tasks.

In addition, your data may be communicated to:

- I. Other companies belonging to the Mediobanca Group;
- II. Third-party companies that the Company turns to for the execution of tender procedures;
- III. Entities responsible for stuffing, shipping, and archiving documentation related to contractual relationships;
- IV. Entities providing services for the management of the Company's IT system;
- V. Entities providing professional consultancy and tax, legal, and judicial assistance services;
- VI. Entities responsible for auditing and certifying the balance sheet;
- VII. Entities providing insurance services;
- VIII. Entities involved in debt collection;
- IX. Entities engaged in factoring;
- X. Authorities and supervisory bodies, and in general, public or private entities with public functions;
- XI. Entities assessing financial risks for the purpose of preventing the risk of insolvency, such as, for example, the Bank of Italy;
- XII. Entities managing national and international systems for fraud control against banks and financial intermediaries;
- XIII. Other authorities and law enforcement agencies, in case of requests from them or in case of legal obligation.

The entities belonging to the categories mentioned above process personal data as separate data controllers or as processors specifically appointed by the Company with the guarantees provided for in Article 28 of the GDPR. The list of data processors appointed by the Company is available on the website [www.spafid.it](http://www.spafid.it) in the "Privacy" section.

Your personal data will be transferred outside the European Union exclusively in the presence of a decision of adequacy by the European Commission or other adequate safeguards provided for by Privacy Regulations (including binding corporate rules and standard protection clauses).

The personal data processed by the Company are not subject to disclosure.

## **f) Data retention**

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In compliance with the principles of proportionality and necessity, personal data will be stored in a form that allows the identification of data subjects for a period not exceeding the achievement of the purposes for which they are processed, taking into account:

- The need to continue storing personal data collected for purposes strictly connected and instrumental to the contractual relationship established with the counterparty or to protect the legitimate interests of the Controller, as described in the aforementioned purposes;
- The existence of specific regulatory obligations (codified legislation, anti-money laundering legislation, tax monitoring legislation, etc.) or contractual obligations that require the processing and storage of data for certain periods.

## **g) Rights of the data subject**

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Individuals to whom personal data refers have the right at any time to obtain confirmation of the existence or otherwise of such data and to know its content and origin, verify its accuracy, or request its integration or updating, or correction (Articles 15 and 16 of the GDPR).

Furthermore, data subjects have the right to request the deletion, limitation of processing, withdrawal of consent (if collected), data portability, and to lodge a complaint with the supervisory authority and object in any case, for legitimate reasons, to their processing (Article 17 et seq. of the GDPR). These rights can be exercised by written communication accompanied by a valid identity document of the data subject to be sent to: [privacy@spafid.it](mailto:privacy@spafid.it). The Controller, also through the designated structures, will take charge of your request and provide you with information on the action taken regarding your request without undue delay.

## **h) Data Controller and Data Protection Officer**

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The Data Controller for the processing of data is Società per Amministrazioni Fiduciarie "Spafid" S.p.A. with registered office in Milan, Via Filodrammatici 10. Spafid has designated the Data Protection Officer of the Group as the Data Protection Officer.

The Data Protection Officer can be contacted at the following addresses:

- [DPO.mediobanca@mediobanca.com](mailto:DPO.mediobanca@mediobanca.com)
- [dpomediobanca@pec.mediobanca.com](mailto:dpomediobanca@pec.mediobanca.com)