

PERSONAL DATA PROTECTION NOTICE FOR NATURAL PERSONS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ISSUED ON APRIL 27, 2016.- WHISTLEBLOWING -

This information document explains which categories of personal data are processed in the context of 'Whistleblowing' reports, what the sources of the data are, with whom the data are shared and for how long they are stored, as well as the rights granted by the GDPR (General Data Protection Regulation - Regulation (EU) 2016/679, hereinafter also the "Regulation").

The personal data and information acquired by Intesa Sanpaolo Bank Luxembourg (the "Company") to which the "Whistleblowing" report is sent shall be processed by it in its capacity as Data Controller for the purpose of the management of the abovementioned report and has its legal basis in the fulfillment of a legal obligation. Failure to provide information, or the provision of incomplete information, will result in the impossibility for the Company to which the report is sent, to carry out all or part of the fulfillments required by regulations on reports of violations of both European and national laws, that damage the public interest or the integrity of Intesa Sanpaolo Bank Luxembourg and its subsidiaries.

Data processed: the Personal Data processed by the Data Controller are acquired:

- **from a direct source - indicated by the whistleblowing reporter verbally and/or in writing within the report delivered through the provided channels:** surname, first name and, if given, any e-mail, telephone number, detailed description of the facts and behaviors which are relevant for the report.
- **from indirect source - obtained from the report and/or any administrative files:** surname and first name of other persons, company personal identification code, any detailed description of the facts and behaviors which are relevant for the report.

Processing activity: the information provided will be processed, by means of computerized, telematic and manual tools, with logics strictly related to the purposes indicated above and, in any case, in compliance with the technical and organizational measures required by law to guarantee the confidentiality of the information, according also with proportionality and non-excessiveness principles, with respect to the purposes pursued.

Data disclosure: Personal Data is not disclosed. Third parties that may be involved in the data processing for the pursuit of the purposes indicated above may be:

- a) Authorities and subjects to whom the communication of data is due in fulfillment of regulatory obligations;
- b) entities operating in the following areas:
 - IT/telecommunication procedures/systems supply and management;
 - IT security;
 - Advisory;
 - data and document storage (both in paper and electronic form);

The list of recipients of personal data can be requested to the Data Protection Officer.

Retention period: Personal Data will be processed only for the time related to the individual phases of the management of the report, and in any case no longer than 5 years starting from the date of communication of the outcome of the reporting procedure.

Rights of the data subject: at any time, towards the Data Controller, the data subject may exercise the rights provided for in the Regulation, except in the case where the exercise of such rights may result in actual concrete prejudice to the confidentiality of the reporter identity.

- Access (art.15 GDPR): allows you to obtain confirmation as to whether or not personal data concerning you is being processed, to obtain information on the current processing activity and to receive a copy of the data.
- Rectification (art.16 GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you and the integration of incomplete data.
- Erasure (art.17 GDPR): provides for a series of cases in which you have the right to obtain the deletion of personal data concerning you (e.g. if the data is no longer necessary in relation to the purposes for which it was processed and there is no other legal basis for the processing itself).
- Restriction of processing (art.18 GDPR): provides for a series of cases in which you have the right to obtain the restriction of the processing of personal data concerning you (e.g. for the period necessary to carry out the appropriate checks on the personal data whose accuracy you have contested).
- Portability (art.20 GDPR): provides for a series of cases in which you have the right to receive the personal data you have provided to us about yourself in a structured, commonly used, and machine-readable format. The GDPR also protects your right to transmit this data to another data controller without hindrance from us.
- Objection (art.21 GDPR): allows you to object to the processing of your personal data if the conditions set out in the legislation are met, for example, in the case of processing carried out to perform public interest tasks, to exercise public authority or to pursue a legitimate interest of ours or of third parties. In such cases, the processing will no longer be carried out unless there are reasons compelling us to do so, or it is necessary for the establishment, exercise, or defense of legal claims.
- Automated decision-making, including profiling (art.22 GDPR): usually, we do not make decisions based solely on automated processing of personal data except in specific areas and only when the decision relates to the conclusion or performance of a contract, is based on explicit consent, or is authorized by law.
- Complaint (art.77 GDPR): If, in your opinion, your personal data is being processed in violation of the related current applicable law, you have the right to lodge a complaint with the competent Data Protection Authority.

Data Protection Officer: For any issue relating to the processing of Personal Data and/or to exercise your rights, you may contact the DPO at the following e-mail address:

dpo@intesasanpaololux.com

Boulevard de Kochelscheuer 28 - L-1821 Luxembourg