

Information Notice in accordance with articles 13 and 14 of Regulation (EU) 2016/679 and current national legislation on personal data protection

In accordance with Regulation EU 2016/679 (hereinafter the "GDP Regulation" or the "GDPR") and current national legislation in force on the protection of personal data (hereinafter, together with the GDPR, the "Privacy Legislation"), MBFACTA S.p.A., with registered office in Milan, at Via Siusi 7 (hereinafter the "Company" or the "Controller"), as Data Controller, is required to provide an Information notice on the use of personal data.

The personal data held by the Company are generally collected directly from the data subject and may occasionally be supplied by third parties (e.g. Mediobanca Group companies, archives and public registers).

The processing concerns personal information relating to the supplier, which is processed when entering into a contract with the Company, as well as in the stages prior to the establishment of the contractual relationship and up to its conclusion. This information is considered personal data pursuant to the GDPR insofar as it relates to a natural person supplier. Data are also to be considered personal data where, in the case of a legal person supplier, they relate directly or indirectly to identified or identifiable natural persons (e.g. directors, employees, managers, collaborators or consultants of such legal person).

a) Purpose, compulsory nature of data provision and processing methods

All personal data are processed in compliance with provisions of law and confidentiality obligations, for purposes that are strictly connected and instrumental to the management of relationships with suppliers, and in particular in relation to the following purposes:

- I. purposes connected to obligations laid down by the law, regulations or European Community rules, as well as instructions given by competent supervisory and oversight authorities or bodies. The provision of personal data for these purposes **is mandatory**;
- II. purposes connected and instrumental to the fulfilment of contractual and pre-contractual obligations connected to the establishment and performance of the supply 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 connected to any corporate events (sale of the Company or business units), due diligence or for the defence of legal claims and in relation to the associated preparatory activities. If the prerequisites are met, the data subject may still exercise the right to object as set out below;
- IV. purposes of sending invitations to events or for institutional communication purposes (both on limited occasions). If the prerequisites are met, the data subject may still exercise the right to object as set out below.

Data are processed using manual, computer and electronic tools, with approaches that are strictly linked to the purposes specified. Processing shall in any case take place in such a way as to guarantee the security and confidential nature of said data, in compliance with the provisions of current legislation.

b) Legal basis

The legal basis for processing pursuant to point I) above is the fulfilment of the legal obligations assigned to the Company.

The legal basis for processing pursuant to point II) above is the need to establish and manage the contractual relationship with the Company.

The legal basis for processing pursuant to point III) above is the Company's legitimate interest in the continuation of its business activities and the protection of its rights.

The legal basis for processing pursuant to point IV) above is the legitimate interest in maintaining the relationship with the data subject and providing institutional information.

c) Disclosure and dissemination of data

For the pursuit of the purposes described in point a) above, the personal data collected by the Company may be processed by employees, consultants and collaborators of the Company who will act as authorised data processors as a result of the duties assigned to them.

Furthermore, such personal data may be disclosed to:

- I. other companies belonging to the Mediobanca Group;
- II. third-party companies on which the Company relies for the execution of tenders;
- III. subjects that handle the enveloping, mailing and archiving of documents relating to relationships with suppliers;
- IV. subjects that provide services for the management of the Company's IT system;
- V. subjects that provide professional tax, legal and judicial advisory and assistance services;
- VI. subjects that audit and certify the financial statements;
- VII. subjects providing insurance services;
- VIII. debt collectors;
- IX. subjects that perform factoring;
- X. supervisory and oversight authorities and bodies and, in general, public or private entities with public functions;
- XI. subjects that identify financial risks in order to prevent the risk of default such as, for example, the Bank of Italy;
- XII. subjects that manage national and international systems to control fraud against banks and financial intermediaries;
- XIII. other authorities and law enforcement, in the event of a request from them or in the event of a legal obligation.

The subjects belonging to the categories listed above process personal data as separate Data Controllers or as Data Processors specifically designated by the Company with the guarantees pursuant to art. 28 of the GDPR. The list of the Company's data processors is available at www.mbfacta.it in the "Privacy" section.

Your personal data will only be transferred outside the European Union if a European Commission adequacy decision or other appropriate safeguards established by Privacy Legislation are in place (including binding corporate rules and standard protection clauses).

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

d) Categories of data processed

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

e) Data retention

In compliance with principles of proportionality and need, personal data will be kept in a manner that enables the data subjects to be identified for no longer than the period necessary to achieve the purposes for which they are processed, consistent with the principles of sound and prudent management, or rather considering:

- ◆ the need to continue to store the personal data collected to offer the services agreed upon with the user or to protect the legitimate interests of the Controller, as described in

the above purposes, in compliance with the assessments performed by the Company;

- ◆ the existence of specific credit, legal and reputational risks, as well as regulatory obligations (codes, money laundering legislation, tax monitoring legislation, regulatory technical standards of the European Banking Authority, etc.) or contractual obligations making the processing and storage of data necessary for specific periods of time.

In any case, for all of the processing purposes specified, the storage periods established by law will be respected, except in the event of interruptions (e.g. lawsuit, pending complaint) and unless the law in force pro tempore establishes different terms.

f) Rights of the data subject

Data subjects shall have the right to obtain confirmation from the controller at any time as to whether or not personal data concerning them are being processed, and to know the relative content and source, verify that they are correct or request that they be supplemented or updated or amended (articles 15 and 16 of the GDPR).

Moreover, data subjects shall have the right to request erasure, the restriction of processing, revocation of consent (when received), data portability and submit a complaint to the supervisory authority and object, in any case, on legitimate grounds, to their processing (articles 17 et seq. of the GDPR).

These rights can be exercised by sending a written communication to privacy@mbfacta.it.

The Controller, directly or through designated facilities, shall process your request and provide you, without undue delay, with full information on the action taken with regard to your request.

g) Data Controller and Data Protection Officer

The Data Controller is MBFACTA S.p.A., with registered office in Milan, at Via Siusi 7. MBFACTA S.p.A. has appointed a Data Protection Officer.

The Data Protection Officer can be contacted at:

- ◆ DPO.mediobanca@mediobanca.com
- ◆ dpomediobanca@pec.mediobanca.com

MBFACTA S.p.A.

Last updated September 2024