

Privacy policy pursuant to art.13 and 14 of EU Regulation no. 679/2016 – “General Data Protection Regulation” (hereinafter referred to as “GDPR”)

Banca Monte dei Paschi di Siena S.p.A. (hereinafter referred to as the “Bank”), as the Data Controller, hereby informs you about the use of your personal data and the rights conferred on you by the GDPR.

1. LEGAL FRAMEWORK IN RELATION TO LEGAL PERSONS

This privacy policy is addressed/targeted only to natural persons, without prejudice to the obligation of confidentiality due to the nature of the data processed, also in relation to the parties belonging to the other categories of persons with whom the Bank comes into contact. As is known, the current legislation on the protection of personal data (GDPR) actually includes any information concerning an identified or identifiable natural person in the notion of “data subject” (Art. 4 par.1). As a consequence, all the rights and obligations arising from such legislation (including the Data Controller’s obligation to provide appropriate and prior information when collecting the data subject’s personal data) do not apply to legal persons, entities and associations.

2. SOURCE OF PERSONAL DATA

The personal data in the Bank’s possession are obtained through your supplier, which assigned the claims arising from the relationship you established with said supplier to our Bank.

3. TYPE OF DATA

The personal data the Bank processes include personal data (e.g. first name, surname, company name), the address and contact details (e.g. e-mail, landline and mobile telephone).

4. PURPOSE OF DATA PROCESSING

All personal data collected are processed by the Bank solely for the purposes related to the management of the acquired claim. The legal basis for such purposes legitimizing the treatment is the need to follow up the credit assignment agreement.

5. METHODS OF DATA PROCESSING

Personal data are processed by means of paper, IT tools and telematics devices and in a logic strictly related to the above-mentioned purposes, so as to ensure their security and confidentiality and, in any case, in compliance with technical and organizational measures suitable to guarantee a level of security proportionate to the risk.

6. CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE DISCLOSED

Your personal data may be disclosed to the third parties appointed as Data Processors pursuant to Art. 28 of the GDPR, or operating independently as separate “Data Controllers” used by the Bank for the activities related to credit management or for processing related to those carried out by the Bank itself. In the event that these companies act as “Data Controllers”, they will provide the data subject with the privacy policy they are responsible for.

In addition, the natural persons belonging to the following categories who - in connection with the performance of the tasks assigned to them, require data access and need to process the data - may become aware of such data as persons authorized to data treatment under the direct authority of the Data Controller or Data Processor:

- > employees of the Bank or employees seconded to the Bank;
- > interns, project-based collaborators or trainees participating in dual training (learning and working) programmes;
- > employees of the companies appointed as Data Processors.

7. TRANSFER OF DATA ABROAD

For the purposes connected with selection activities, personal data may be transferred abroad, within and/or outside the European Union, always in compliance with the rights and guarantees provided for by the current legislation on personal data protection (Chapter V - Transfer of personal data to third countries or international organizations of the GDPR).

This includes the application of standard Contractual Clauses as defined by the European Commission for the transfers to third-party companies or the control of the presence of an adequacy finding of the personal data protection system of the importing country.

8. DATA RETENTION TIME

Your data are kept for the time strictly necessary to fulfil the purposes they were collected for, in compliance with the limitation rules or other terms that may be established by the legal and regulatory provisions of reference, or which might be necessary for the requirements of justice or public interest.

9. RIGHTS OF THE DATA SUBJECT

In relation to the above-mentioned treatment, you are entitled to exercise the rights provided for in Article 15 et seq. of the GDPR, specifically:

- > **the right of access**, i.e. the right to obtain confirmation of the existence or non-existence of personal data concerning you, to know their origin, as well as the logic and purposes underlying the processing, the recipients or the categories of recipients whom the data may be disclosed to, the determination of the storage period if it can be determined;
- > **the right of rectification** of inaccurate data;
- > **the right to erasure** (the so-called right to be forgotten), if the data are no longer necessary in relation to the purposes of their collection and subsequent processing, or where the data subject has withdrawn consent to the processing (where such consent is provided as optional or there is no other legal basis for the treatment);
- > **the right of restriction**, i.e. the right to obtain from the Bank the restriction of access to the personal data by any person who has a service contract or employment agreement with the Bank. In some cases, the Bank reserves the right to allow access to a limited number of persons in order to ensure the security, integrity and accuracy of such data;
- > **the right of portability**, i.e. the right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format, with the possibility of transmitting them to another Data Controller. This right does not apply to non-automated processing (e.g. paper files or registers). Moreover, only the data processed with the data subject's consent, and only if the data have been provided by the data subject itself, are subject to portability;
- > **the right of opposition**, i.e. the right to object to the processing for reasons related to your specific situation;

> **the right to lodge a complaint**, to be sent to the Italian Data Protection Authority (Garante per la Protezione dei dati personali), piazza Venezia n. 11 - 00187 Roma (garante@gpdp.it; telephone + 39 06 69677.1; fax + 39 06 69677.3785), or to bring proceedings before the ordinary Judicial Authority.

In order to exercise the above rights, you may directly contact the branch which maintains your accounts and/or executes the transactions, including occasional transactions, or provides the services, or the DPO and Advisory Privacy Staff, Via A. Moro n. 11/13 - 53100 Siena (fax + 39 0577 296520; e-mail: privacy@mps.it).

10. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is Banca Monte dei Paschi di Siena S.p.A. with registered office in Siena, Piazza Salimbeni, 3.

The Data Protection Officer (or "DPO") is the interim Manager of the DPO and Privacy Advisory Staff of Banca Monte dei Paschi di Siena S.p.A., who can be contacted at the following certified mail address: responsabileprotezionedeidati@postacert.gruppo.mps.it, and the following ordinary mail address: responsabileprotezionedeidati@mps.it, and can be addressed by the data subject for all and any issues concerning the processing of his/her personal data and for the exercise of the rights provided for by the GDPR.