



**DATA PROTECTION NOTICE**

The protection of your personal data is important to the BNP Paribas Group, which has adopted strong principles in that respect for the entire Group in its Group Privacy Policy available at [www.BNL.it](http://www.BNL.it), Privacy section. This Data Protection Notice provides you with detailed information relating to the protection of your personal data by BNL ("we").

We are responsible, as a controller for collecting and processing your personal data in relation to our activities.

The purpose of this Data Protection Notice is to let you know which personal data we collect about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

Further information may be provided where necessary when you apply for a specific product or service.

**1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?**

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services.

We may collect various types of personal data about you, including :

- **identification information** (e.g. name, ID card and passport numbers, nationality, place and date of birth, gender, photograph, IP address);
- **contact information** (e.g. postal address and e-mail address, phone number);
- **family situation** (e.g. marital status, number of children);
- **tax status** (e.g. tax ID, tax status);
- **education and employment information** (e.g. level of education, employment, employer's name, remuneration);
- **banking, financial and transactional data** (e.g. bank account details, credit card number, money transfers, assets, declared investor profile, credit history, debts and expenses related to the relationships with the Bank);
- **data relating to your habits and preferences** :
  - data which relate to your use of our products and services in relation with banking, financial and transactional data;
  - data from your interactions with us: our branches (contact reports), our internet websites, our apps, our social media pages, meeting, call, chat, email, interview, phone conversation;
- **video surveillance** (including CCTV) and geolocation data (e.g. showing locations of withdrawals and payments, for security reasons, or to identify the location of the nearest branch or service suppliers for you);
- **data necessary to fight against over indebtedness;**
- **judicial data.**

We may collect the following sensitive data only upon obtaining your explicit prior consent:

- **biometric data** : e.g. fingerprint, voice pattern or face pattern which can be used for identification and security purposes;
- **health data**: for instance for the drawing up of some insurance contracts.

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation.

Nonetheless, if we have to process some data in further situation we will provide you specific Information Notice and we will acquire your consent.

The data we use about you may either be directly provided by you or be obtained from the following sources in order to verify or enrich our databases:

- publications/databases made available by official authorities (e.g. the official journal);
- our corporate clients or service providers;
- third parties such as credit reference agencies and fraud prevention agencies (data brokers) in conformity with the data protection legislation;
- social media administrator;
- databases made publicly available by third parties.

**2. SPECIFIC CASES OF PERSONAL DATA COLLECTION, INCLUDING INDIRECT COLLECTION**

In certain circumstances, we may collect and use personal data of individuals with whom we have, could have, or used to have a direct relationship such as:

• **Prospects**

For some reasons, we may also collect information about you whereas you have not direct relationship with us.

This may happen for instance when your employer provide us with information about you or your contact details are provided by one of our client if you are for example:

- Family members;
- Co-borrowers / guarantors;
- Legal representatives (power of attorney);
- Beneficiaries of payment transactions made by our clients;
- Beneficiaries of insurance policies and trusts;
- Landlords;
- Ultimate beneficial owners;
- Company shareholders;
- Representatives of a legal entity (which may be a client or a vendor);



- Staff of service provider and commercial partners.

**3. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?**

**a. To comply with our legal and regulatory obligations**

We use your personal data to comply with various legal and regulatory obligations, including:

- banking and financial regulations in compliance with which we:
  - set up security measures in order to prevent abuse and fraud;
  - detect transactions which deviate from the normal patterns;
  - define your credit risk score and your reimbursement capacity;
  - monitor and report risks that institution could incur; and
  - record, when necessary, phone calls, chats, email, etc.
- reply to an official request from a duly authorised public or judicial authority;
- prevention of money-laundering and financing of terrorism;
- compliance with legislation relating to sanctions and embargoes;
- fight against tax fraud and fulfilment of tax control and notification obligations.

**b. To perform a contract with you or to take steps at your request before entering into a contract**

We use your personal data to enter into and perform our contracts, including to:

- provide you with information regarding our products and services;
- recover any credits and, more generally, to manage any disputes that may arise between us;
- assist you and answer your requests;
- evaluate if we can offer you a product or service and under which conditions; and
- provide products or services to our corporate clients of whom you are an employee or a client (for instance, in the context of cash management).

**c. To fulfil our legitimate interest**

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- proof of transactions;
- fraud prevention;
- IT management, including infrastructure management (e.g. : shared platforms) & business continuity and IT security;
- establishing individual statistical models, based on the analysis of transactions, for instance in order to help define your credit risk score;
- establishing aggregated statistics, tests and models, for research and development, in order to improve the risk management of our group of companies or in order to improve existing products and services or create new ones;
- personalising our offering to you and that of other BNP Paribas entities through:
  - improving the quality of our banking, financial or insurance products or services;
  - advertising products or services that match with your situation and profile which we achieve.

This can be achieved by:

- carrying out a minimum analysis of your elementary personal data (e.g. employment, age, products purchased, channels used to get in touch with BNL);
- determining if you your profile falls in one or more customer clusters.
- to promote the sale of products and services (similar or complementary to those which you have purchased provided) provided by BNL and/or BNL Group and BNP Paribas Group, using your email address and/or the addresses provided by you and/or your telephone numbers (fixed and mobile) without prejudice to your right to object and to not receive such communications anymore (specifying the channel through which you no longer wish to be contacted). Any use of your telephone number will be in any case in compliance with the current regulations about the so-called Public Objections Register;
- sharing, in order to protect the Group, with BNL Group companies and BNP Paribas Group, also in Extra-EU countries, personal data relevant to preventing money laundering, terrorist financing, to comply with the current regulations on sanctions and embargoes, to fight against tax fraud and fulfil tax control and notification obligations.

Your data may be aggregated into anonymised statistics, which may be offered to professional clients to assist them in developing their business. In this case, your personal data will never be disclosed and those receiving these anonymised statistics will be unable to ascertain your identity.

**d. Specific treatments that require your consent**

In the following cases, we must obtain your consent to process you data where, for instance, the above purposes lead to automated decision-making, which produces legal effects or which significantly affects you. At that point, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing.

Moreover, BNL needs to obtain your consent:

**d1) Profiling**

To process your personal data, even through electronic methods, in order to identify specific behaviors and habits, thus improving our products and services and providing offers in line with your preferences.

This activity is carried out by:



- segmenting our customers;
- enriching the data we have with those obtained from external sources within the limits permitted by law;
- analyzing your habits and preferences in the various channels (visits to our branches, emails or messages, visits to our website, use of BNL software installed by you, such as apps);
- evaluating your relationships the progress (including credit);
- analyzing the products you already own and your operations, even those online;
- matching the products or services that you already hold or use with other data we hold about you (e.g. we may identify that you have children but no family protection insurance yet);
  - monitoring transactions to identify those that deviate from normal routines (e.g. when you withdraw a large sum from your account in a country where you do not live);
  - analyzing the geolocation data and the data related to your activities in our websites. The profiling of this navigation will be carried out as indicated in the information on the use of cookies present on them, to which reference should be made.

#### **d2) Marketing activities**

With your consent, BNL may perform statistical surveys, market research and the promotion/sale of products and services provided by BNL and third-party companies, including those belonging to the BNL and BNP Paribas Groups. These activities can be carried out through traditional methods (such as, for example, paper mail and operators calls) and through automated methods (such as, for example, calls without operator, e-mail, fax, MMS, sms, interaction that technological innovation will make available, etc). Moreover, BNL may measure the degree of customer satisfaction on the quality of the provided services (through activities directly performed or through the cooperation with specialized companies by personal or telephone interviews, questionnaires, etc).

The objection to the processing of data carried out by BNL with automated methods will be understood as extended to all contact methods, unless otherwise specified.

#### **d3) Communication of data to other subjects for marketing purposes**

BNL, with your consent, may communicate your personal data to third-party companies, including those belonging to the BNL and BNP Paribas Groups, which will treat such data as independent data controllers, for commercial information purposes, statistical surveys, market, direct offers of their products and services through traditional and automated methods.

The complete list of entities to which BNL communicates the data is available in BNL website, where it is specified how you can consult their Data Protection Notice.

#### **4. WHOM DO WE SHARE YOUR PERSONAL DATA WITH?**

In order to fulfill the aforementioned purposes, we only disclose your personal data to:

- BNP Paribas Group entities (e.g. you can benefit from our full range of group products and services);
- Independent agents, intermediaries or brokers, banking and commercial partners, with which we have regular relationship;
- Financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors.
- Management companies of national and international systems for the control of fraud against banks and financial intermediaries
- Credit cards services (e.g. Visa, Mastercard, SIA - SSB, Cirrus, Maestro)
- Entities that cooperate in the payment services (e.g. SWIFT, Eurocheque).

#### **5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA**

In case of international transfers originating from the European Economic Area (EEA), where the European Commission has recognized a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to countries outside the EEA, whose level of protection has not been recognized by the European Commission, we will rely on a derogation applicable to the specific situation (e.g. if the transfers is necessary to carry out our contract with you, such as international payment) or we have implemented one of the following safeguards to ensure the protection of personal data, such as the standard contractual clauses approved by the European Commission.

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in Section 9.

#### **6. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

Unless the law imposes specific conservation requirements, We will retain your personal data for the entire duration of the contract and for a further term of 10 years and six months or 15 years and six months from the end of the relationship (relating to the limitation periods during which we may need to defend our rights or relating to the conservation requirements imposed by law) if such data are necessary to execute the contracts in place between us or to perform operations you have arranged/requested or to satisfy our legitimate interest.



Referring to the functional data for the establishment of the relationship, these data will be kept for a maximum term of 12 months in order to allow us to respond to your specific requests.

We will process your personal data for marketing and profiling purposes (if you have given us your consent or the activity falls within a hypothesis of legitimate interest referred to in paragraph 3c), until we have a relationship with you and for a further period of 12 months, unless there are no detailed regulations defining lower terms.

For prospects, the data retention time is 12 months from the last contact with BNL.

#### **7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

In accordance with applicable regulations, you have the following rights:

- To **access**: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To **rectify** where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To **erase**: you can require the deletion of your personal data, to the extent permitted by law.
- To **restrict**: you can request the restriction of the processing of your personal data.
- To **object**: you can object to the processing of your personal data, on grounds relating to your particular situation. You may object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To **data portability**: where legally possible, you have the right to receive or transfer to another controller (if technically possible) of the personal data you provide and those generated during our relationship. The data resulting from our processing and evaluations are excluded, if the processing is based on consent or contract and is carried out by automated methods;
- To **withdraw**: you can withdraw any time your consent to the processing of your personal data.

If you wish to exercise the rights listed above, you can access BNL website, Privacy section, using the specific form or please send a written note to the following address [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com); [dirittiprivacy@pec.BNLmail.com](mailto:dirittiprivacy@pec.BNLmail.com). In this section, you will also find more details about the abovementioned rights. For any request concerning the processing of your personal data you can access the website [www.BNL.it](http://www.BNL.it) where you can also find the list of Third Parties, within which, for the companies referred to in d3) you can find their address for the exercise of the rights mentioned in this paragraph.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

#### **8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?**

In a world of constant technological changes, we may need to regularly update this Data Protection Notice.

We invite you to review the latest version of this notice online and we will inform you of any material changes through our website or through our other usual communication channels.

#### **9. HOW TO CONTACT US?**

BNL, based in Rome, Viale Altiero Spinelli, 30, website: [www.BNL.it](http://www.BNL.it), e-mail address to write to exercise the rights of data subject: [dirittiprivacy@BNLmail.com](mailto:dirittiprivacy@BNLmail.com). Under the art. 38 GDPR, we also provide you the contact details of the Data Protection Officer (DPO), Mario Mosca, e-mail address [dataprotectionofficer@BNLmail.com](mailto:dataprotectionofficer@BNLmail.com).

If you wish to learn more about Privacy and Security, please read our *cookies policy* and our client security policy, available in BNL website, [www.BNL.it](http://www.BNL.it).

BANCA NAZIONALE DEL LAVORO SPA