

Domestic bank transfers in Euros: privacy information

Dear Client,

starting from January 1, 2008, the IBAN (International Bank Account Number) code, already in use for crossborder payments, will also be used for bank transfers in Italy instead of the traditional bank sort codes (ABI and CAB codes and current account number).

The IBAN code is used internationally to identify every bank account. It is made up of a series of letters and numbers providing a standardised identification of the Country in which the account, the bank, the branch and the current account of the holder are located.

We would remind you that BNL, as the controller of the data provided by yourself, has prepared the IBAN code of your current account and has proceeded to report it in the related statement of account starting from July 1, 2003.

The introduction of the use of the IBAN code for domestic bank transfers in Euros will thus make it necessary to update your bank sort codes (ABI and CAB codes and current account number) with the IBAN code. This will permit those persons, already authorised by you and who have made transfers to your current account, to continue to do so.

For this reason the banking system has decided to activate an "electronic alignment" service for IBAN codes through which the person ordering the transfers will be able to request the updating of the bank sort codes of the beneficiaries of its payments by an electronic flow.

In order therefore to continue to perform the contract you executed with us requiring us to pay transfers onto the current account you hold with BNL in your name, it will be necessary to communicate your updated details ABI and CAB codes and current account number, including your IBAN code, to the banks used by those persons (e.g. your employers and/or suppliers) who are authorised by you to make such payments to your current account with our Bank and to which you have previously notified your bank sort codes (ABI and CAB codes and current account number).

The contribution of data necessary for such purpose is not obligatory, but the withdrawal of your consent to their processing or in any case, a refusal to allow their communication might mean that BNL will be unable to render the service requested. Their processing does not require the consent of the person concerned, by virtue of Articles 24, paragraph 1, letter b), and 43, paragraph 1, letter b), of Legislative Decree no. 196/2003.

BNL and any other banks that the above persons refer to when making a request for the IBAN code, will process the information in their capacity as joint data controllers exclusively for purposes connected with the initiative concerned and using manual, IT and remote tools, according to logical procedures strictly correlated to such purposes and for the time strictly necessary for the completion of the same and in any case in compliance with the provisions under Legislative Decree no. 196/2003, as well as in compliance with security policies.

A detailed list of persons which have requested and obtained the updating of your bank sort codes with the corresponding IBAN code, through the abovementioned "electronic alignment" service of IBAN codes, may be requested from any of our Branches.

Pursuant to Article 7 of Legislative Decree no. 196/2003, you are guaranteed the right to access data relating to you. In particular, you may obtain confirmation from BNL and any other banks through which requests for IBAN code alignment have been made, for example, of the existence or otherwise of your personal data, an indication of the source from which your data have been taken, the procedures and purposes of the processing and the logic applied to such processing if the processing is effected by electronic means, the updating, the correction or, if you wish, the integration of the data, the deletion, their transformation into anonymous form or the block of the data if it has been processed in breach of the law.

In order to exercise all the rights under Article 7 of Legislative Decree no. 196/2003, you may refer to the Customer Data Manager at BNL S.p.A..

Rome, October 1, 2007