



## **Client information notice**

Pursuant to Regulation EU 2016/679, the General Data Protection Regulation (the "GDPR"), and the existing national regulation on data protection ("Data Protection Law"), Mediobanca International (Luxembourg) S.A. (hereafter "MBIL"), with registered office in Luxembourg, 4 Boulevard Joseph II, L – 1840 Luxembourg, acting as data controller or data processor, shall provide disclosure in relation to the use of personal data.

### **Categories of personal data processed**

MBIL may collect and process personal data from you in the course of its business, including and when you contact or request information.

The personal data processed includes:

- Name, surname, date of birth and civil status;
- Address, telephone number and email address;
- Identity card and nationality;
- Professional title and occupation;
- Health insurance card, fiscal code and customer code;
- Data relating to credit requests / reports;
- Accounting/Financial data such as tax status, bank account details and evidence of ownership of financial assets;
- Electronic information data such as IP address;
- Any other personal data provided by you allowing Mediobanca to perform its contractual obligations.

### **Collection of personal data**

As a general rule, personal data held by MBIL are collected directly from the data subject via, for instance, application forms or any other material which is submitted to us, and occasionally may be provided from third parties (e.g. credit or debit transactions disposed by the data subject or by other subjects or where the MBIL acquires data from external companies for commercial purposes, for market research, products or services direct offers). Your data may be collected also from third parties such as public or private databases (e.g. title/mortgage searches, prejudicial/protest documents, central credit registers, etc.).

Your personal data may also be collected by using recording and monitoring tools that MBIL uses for compliance and/or security purposes.

You are not obliged to provide us with your personal data where it is requested. However, please note that we may be unable to provide certain products or services or proceed with your business relationship if you do not do so.



### **Purpose of the processing and why your personal data is required**

MBIL collects and processes personal data in a number of ways and for various purposes.

Your personal data may be used for the following purposes in line with the lawful basis under the GDPR:

- I. Purposes connected with law obligations, regulations, European laws, and instructions from competent Authorities or supervisory and control bodies in relation to anti-money laundering, prevention of fraud, corruption, tax evasion and bribery. Providing personal data for these purposes **is mandatory**. Failure to provide your personal data will prevent MBIL from executing the activities requested by you which entail compliance with law obligations from Mediobanca itself. The processing is necessary in order to comply with a legal obligation to which MBIL is subject.
- II. Purposes that are strictly connected and functional to the execution of contractual obligations, the fulfillment, before the conclusion of the contract of specific requests from the data subject and judicial and/or non-judicial disputes (i.e., warning letters and activities relating to the enforced recovery of credit, etc.). Providing personal data for these purposes **is mandatory** because necessary for the execution of contractual obligations (e.g., MiFID questionnaire, subscription forms, update and maintain of records, reporting, etc.). Failure to provide your personal data will prevent MBIL from satisfying your pre-contractual/contractual requests and executing the contract. The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.



### **Protection of your personal data**

Your personal data will be processed, in compliance with GDPR and Data Protection Law provisions, through paper, IT and automated tools with logics strictly connected to the aforementioned purposes and, in any case, in order to guarantee the security and confidentiality of the data in accordance with Data Protection Law.

MBIL uses a variety of technical and organisational measures to help protect your personal data from unauthorised access, use, disclosure, alteration or destruction consistent with applicable Data Protection Law.

### **Disclosure of personal data**

In order to achieve the abovelisted purposes your personal data will be disclosed internally by MBIL's employees on a need-to-know basis.

Moreover, your data may be communicated to:

- a) other Group companies;
- b) providers of transmission, packaging, transport and sorting services for communications to clients;
- c) other types of subjects of which MBIL makes use for different purposes while providing the product or service;
- d) managers of IT systems used by MBIL to process data subject's personal data;
- e) subjects providing professional advisory, tax, legal, judicial advisory;
- f) subjects providing auditing services;
- g) Authorities and Supervisory and control bodies;
- h) subjects monitoring financial risk in order to prevent insolvency;
- i) subjects managing fraud prevention against banks and financial intermediaries;
- j) other Group financial intermediaries in case your transactions are considered to be "suspicious" under Anti-money Laundering Directive.

MBIL is committed to transferring personal data to countries outside the EU only where:

- an adequate level of protection (as defined by the European Commission) is ensured; and
- specific measures such as model clauses, issued by the European Commission, or binding corporate rules have been taken.

### **Data retention**

In accordance with the principles of proportionality and necessity, personal data will be stored in a form that allows the data subject identification for a period of time not exceeding the achievement of the purposes for which it was initially collected. The personal data will be retained:

- for as long as it is necessary for the purpose or purposes for which it was intended, subject always to the legal periods of limitation;
- for the purposes of performing or fulfilling a contractual obligation with you;
- for as long as required or permitted by law.



**MEDIOBANCA**  
*International (Luxembourg) S.A.*

MBIL adopts reasonable measures to guarantee that inaccurate personal data are updated or, where necessary, erased.

### **Data subject rights**

You are entitled to request details of the personal data MBIL holds about you and how it processes it. You also have a right to have it rectified or deleted, to restrict MBIL's processing of that personal data, to have your personal data transferred directly from us to another controller, and to object to the processing. You may also have the right to lodge a complaint in relation to MBIL processing of your personal data with the local supervisory authority, the Commission Nationale pour la Protection des Données (the "CNPD").

If you object to the processing of your personal data, or if you have provided your consent to processing and you later choose to withdraw it, MBIL will respect that choice in accordance with legal obligations.

Please be aware that these rights are not always absolute and there may be some situations in which, technically or legally, MBIL may not be able to fulfil your request.

The rights should be exercised by means of written communication sent to: [dpo@mediobancaint.lu](mailto:dpo@mediobancaint.lu).

### **Data Controller and Data Protection Officer**

For any questions about MBIL's processing of personal data you may send an email at [dpo@mediobancaint.lu](mailto:dpo@mediobancaint.lu) or write at:

Mediobanca International (Luxembourg) S.A.  
Attention: Data Protection Officer  
4 Boulevard Joseph II  
L-1840 Luxembourg