



## **Service providers Information Notice required under Articles 13 and 14 of Regulation (EU) 2016/679 and existing national regulations in force on personal data protection**

In accordance with Regulation EU 2016/679, the General Data Protection Regulation (the "GDPR") and the existing national regulation on data protection (the "Data Protection Law"), Mediobanca International (Luxembourg) S.A. (hereafter "MBIL", "Bank" or "Controller") with registered office in Luxembourg, 4 Boulevard Joseph II, L – 1840 Luxembourg, as data controller is required to provide an Information notice on the use of personal data.

Your personal data held by the Bank 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).

### **Purposes of the processing**

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

- I. Purposes connected to the obligations required by law, regulations, EU legislation and provisions issued by the competent authorities or supervisory and control bodies. The provision of personal data for such purposes **is mandatory**. The legal basis is compliance with legal obligations to which the Bank is subject to.
- II. Purposes related and functional to the performance of contractual and pre-contractual obligations in connection with the establishment and execution of a supply relationship with the Bank. The provision of personal data for such purposes **is mandatory** for the establishment of the contract with MBIL. The legal basis is the condition to establish and manage a contractual relation with the Bank.

Data is processed using manual, computer and telematic tools, with logics 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 with MBIL's policies and in accordance with Data Protection Law.

### **Legal basis**

The legal basis for the data processing lies in the compliance with laws and in the execution of contractual and pre-contractual obligations.

### **Disclosure of personal data**

Your personal data may be disclosed to subjects carrying out processing and/or providing services strictly functional to precontractual activities and the execution of the contract (also with continuous processing) within MBIL or Mediobanca's Group entities, such as:

- public and private subjects able to access the data by virtue of provisions of the law, regulation or European Community legislation, within the limits set out therein;
- our consultants, within the limits necessary to fulfil their appointments, after having received a letter of appointment from us, binding them to confidentiality and secrecy.

Data may be disclosed to persons in charge of the processing/authorised operators employed by MBIL.



## **Categories of personal data processed**

MBIL may collect and process personal data from you such as your name, surname, employer, professional title, occupation, professional address and signature, and any other personal data provided by you in the course of your dealings with MBIL.

## **Data retention**

In accordance with the principles of proportionality and necessity, personal data will be stored in a manner that allows the data subjects to be identified for no longer than the period necessary for the purpose for which it was initially processed, or rather considering:

- the need to continue to store the personal data collected to offer the services agreed with the user or to protect the legitimate interests of MBIL, as described in the above purposes;
- the existence of specific regulatory (codes, money laundering legislation, investment services legislation, tax monitoring legislation, etc.) or contractual obligations making the processing and storage of data necessary for specific periods of time.

## **Rights of the data subject**

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 comply with 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**

The Data Controller is Mediobanca International (Luxembourg) S.A., with registered office in 4 Boulevard Joseph II, L-1840 Luxembourg.

The Bank appointed a Data Protection Officer who can be contacted at the email [dpo@mediobancaint.lu](mailto:dpo@mediobancaint.lu) or writing at:

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

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