



## **Employee information notice in accordance with articles 13 and 14 of Regulation (EU) 2016/679 and current national legislation on personal data protection relating to the management of the employment relationship**

In accordance with 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, qualifies as data controller and, as such, is required to provide an information notice on the use of personal data to its employees.

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

MBIL, as data controller, collects, stores and processes, by electronic or other means, the personal data listed below, in accordance with the Data Protection Law. Failure to provide such personal data may result in MBIL not being able to enter into the employment contract or terminating such employment contract.

MBIL processes your personal data including, but not limited to, personal details (e.g. name, address, phone number, nationality, ID number, marital status, hobbies), photographs, financial data (e.g. salary, bank details, bonuses and other benefits), job title, professional experience and education, information concerning performance, written and electronic communications, and any other data in connection with the management of your employment relationship.

It is possible that in fulfilling specific obligations relating to the management of the employment relationship, such as accounting, remuneration, social security, welfare and tax matters, MBIL may come into possession of data that the law defines as belonging to special categories, i.e., data from which racial and ethnic origin can be revealed, religious beliefs, political opinions, membership of religious, political or union parties, unions, associations or organisations, state of health and sex life (e.g., illness and injury certificates, pregnancy certificates, union delegations, membership of "protected" categories, participation in worker representation organisations, results of medical visits performed in accordance with the law and contract, public offices, etc.).

MBIL may also process legal personal data (i.e. data relating to rulings subject to registration with the Criminal Records Office, including capacity as defendant or person under investigation), exclusively in the cases and manner envisaged by the law or by a measure taken by the Luxembourgish data protection authority (for example to assess the requirement of honourableness in respect of those assigned managerial or elective offices, or to arrange for any measures envisaged by collective agreements in connection with criminal proceedings).

In addition to the personal data above, MBIL might be provided with information relating to the employees' relatives and friends in connection with emergency contact and medical leaves. By providing this information, the employees confirm to MBIL that those persons are aware that their personal information has been provided for this purpose.



## Collection of personal data

Personal data held by MBIL is generally collected directly from the data subject and may occasionally be supplied by third parties such as head-hunting companies, training agencies, social security, tax administration, insurance companies.

## 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 managing the employment relationship, including for social security and, in particular:

- 1) to fulfil obligations laid down by the law, a regulation or European legislation, as well as instructions given by competent authorities (e.g. for social security and tax purposes). The processing is necessary for compliance with a legal obligation to which MBIL is subject;
- 2) to execute requirements connected with your contract of employment (such as, for example, to note attendance or for situations relating to changes in classification, qualification, increases, redundancies, new hires, payroll, withhold taxes, manage holidays and other leaves, etc.), to fulfil obligations deriving from collective bargaining agreements and your contract of employment or under the scope of an internal disciplinary measure. The legal basis for processing is the need to execute the contract of employment stipulated with MBIL;
- 3) for other activities connected with the management of the contract of employment, including the stipulation of non-mandatory insurance policies or which are not envisaged by current contracts of employment, company news, awards following performance assessments, participation in corporate events, etc. The legal basis for processing is the consent you have given (for instance for complementary insurance policies), or the legitimate interest of MBIL.

For the processing described under points 1) and 2), data provision is mandatory and we do not need your consent. Failure to provide such data will make it impossible to fulfil the contract of employment and precisely comply with legal obligations and those stemming from collective bargaining agreements. Instead, for the processing pursuant to point 3), you may choose whether or not to consent to the processing and communication to the subjects indicated thereafter, but you should be aware that failure to give consent will make it impossible for you to benefit from the services pursuant to point 3 of this paragraph.

Personal data collected by the Bank, for the purposes pursuant to points 1), 2) and 3) above, through the login to the tools used to carry out working activities and the access and attendance registration tools, may be used for all purposes connected with the employment relationship, within the limits and in compliance with the obligations set out in the Luxembourg Labour Code and in the guidance issued by the Commission Nationale pour la Protection des Données.

The internal regulations defined by MBIL are available on the corporate folder for consultation; these specify how the corporate tools made available can be used and how controls are run.



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

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 the said data, in compliance with the provisions of current applicable legislation.

Supervisory Authorities, following the Regulation EU 65/2014 and implementing measures, require the registration of orders given over the telephone by clients. Telephone conversations or telematic data traffic may therefore be recorded in some organisational units and the recordings kept for the length of time required by the law and regulation, using procedures designated by the relevant authorities.

### **Disclosure of personal data**

Data may be disclosed to:

- Companies processing payslips and pension contributions;
- Companies which archive documents;
- Companies processing data and managing computer systems;
- Mediobanca Group companies;
- Mandatory social security and tax entities; public or private health institutions for health visits;
- Insurance companies (accident/illness policies);
- Banks for the payment of salaries, deposit of signatures;
- Trade union organisation for the payment of subscription fees;
- Companies supplying badges for the detection of attendance or meal tickets or entities appointed to provide tax assistance;
- Travel agencies for travel document requests;
- External consultants.

### **Data retention**

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

- 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.



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### **Rights of the data subject**

Pursuant to art. 15 and following articles of GDPR, 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**

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

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



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### **CONSENT TO THE PROCESSING OF PERSONAL DATA**

I, the undersigned ....., having acknowledged the information notice supplied to me by Mediobanca International (Luxembourg) S.A. in accordance with Regulation (EU) 679/2016 and existing national regulation on data protection, hereby declare that I have received the personal data processing information notice for the purposes relating to the management of my employment relationship.

**With reference to the “purposes of the processing”, point 3) above** in relation to the activities connected with the management of the employment relationship, including, by way of example: the execution of non-mandatory insurance policies or policies which are not envisaged by current contracts of employment, participation in corporate events, publication on the corporate intranet of my personal data, including my name, surname, area where I work, role and photographic images.

☐ I agree    ☐ I do not agree

**Date and signature of the data subject**

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