

# Personal data protection notice for contact form

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## 1. YOUR PRIVACY

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At **Intesa Sanpaolo S.p.A.** we know the value of your personal data and we constantly strive to process them confidentially and securely so that you may entrust them to us with peace of mind.

In this notice we will show you which categories of data we handle and why; which data sources we draw on; how we process data, with whom we share it and for how long we store it. We will then review each of your rights, set forth in the GDPR (**General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016**), providing you with the information you need to exercise them.

We are at your service to ensure adequate, timely and rigorous protection of your data.

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## 2. TO WHOM IS THIS NOTICE ADDRESSED?

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To each of our **potential customers**; and therefore to you who are interested in receiving information about our product and service offers.

Its content may concern you as a natural person, sole proprietor or freelancer.

If you become our **customer**, you will receive further information on the processing we will carry out in order to manage the contracts you wish to establish.

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## 3. WHAT PERSONAL DATA DO WE PROCESS?

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The personal data we process and protect belong to the following categories:

- a) **identification and personal data**, such as your name and surname, business name, VAT number;
- b) **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail addresses;
- c) **other data**, provided in order to deal with your request for information such as those included in the notes field of the contact form.

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## 4. WHY ARE WE ASKING YOU TO PROVIDE US WITH YOUR DATA?

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We need your data to respond to your specific request for information on our product and service offer and for request of recontact. Not providing your data means that we will not be able to process your request.

5. FROM WHOM DO WE COLLECT YOUR DATA? HOW DO WE PROCESS THEM?



The data we process has direct origin as it is communicated to us directly by you.

We take care of your data in any case: we process them using manual, computerised and telematic tools and we guarantee their security and confidentiality.

6. WHAT IS THE UNDERLYING BASIS ON WHICH WE PROCESS YOUR DATA? FOR WHAT PURPOSES DO WE PROCESS YOUR DATA?

The processing of personal data is lawful only if its purpose has a valid legal basis, i.e. it is included among those provided for by the GDPR.

We will show you briefly, with respect to the different legal bases provided for, what processing we carry out and the aims we pursue for those who, like you, are not yet our customers.

THE LEGAL BASIS	OUR PURPOSES
<div>b) Execution of pre-contractual measures upon request of the data subject</div> <div>(Article 6.1(b) of the GDPR)</div>	<div></div> <div>We carry out activities related to your <b>request</b> for information on our product and service offer and to contact you</div>
<div>c) Obligation by law</div> <div>(Article 6.1(c) of the GDPR)</div>	<div><div>We comply with <b>regulatory requirements</b>, e.g. on anti-money laundering and fraud prevention, and we comply with <b>Authority provisions</b>.</div><div></div></div>
<div>d) Legitimate interest</div> <div>(Article 6.1(f) of the GDPR)</div>	<div><div></div><div>We pursue the <b>legitimate interests</b> of ourselves or of third parties, which are shown to be lawful, concrete and specific, after having ascertained that this does not compromise your fundamental rights and freedoms. These include, for example, security of IT systems and networks, prevention of fraud and the production of statistics.</div><div>The full list of legitimate interests that we pursue is described in the annex "Legitimate interests",</div></div>

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## 7. WHO MIGHT RECEIVE THE DATA YOU HAVE PROVIDED US WITH?

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We may disclose your data to other parties, both within and outside the European Union, but **only for the specific purposes indicated in the notice according to the legal bases provided by the GDPR.**

The following may receive your data:

- a) the **Authorities** and the parties to whom the communication of the data is due in compliance with **regulatory obligations**;
- b) parties belonging to the Intesa Sanpaolo Group;
- c) parties with whom we have **commercial agreements**;
- d) parties which act as our **intermediaries and agents**;
- e) parties that operate in the following sectors:
- f) banking, financial and insurance services;
  - provision and management of IT and telecommunications procedures and systems;
  - computer security;
  - freelance professions
  - consultancy in general;
  - service quality surveys and market analysis and research;
  - advertising and commercial promotion of products and/or services;
  - customer relationship management (e.g. in relation to communication and assistance);
  - logistics;
  - the storage of data and documents (both on paper and electronic form).



A detailed list of the recipients of personal data is available from our branches on request.

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## 8. HOW DO WE PROTECT YOUR DATA WHEN WE TRANSFER THEM OUTSIDE THE EUROPEAN UNION OR TO INTERNATIONAL ORGANISATIONS?

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We normally process your data within the European Union; **for technical or operational reasons**, we may, however, transfer the data to:

- countries outside the European Union or international organisations which, as determined by the European Commission, ensure an adequate level of protection;
- other countries, based, in this case, on one of the "appropriate safeguards" or on one of the specific exceptions provided for by the GDPR.



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## 9. HOW LONG DO WE HOLD YOUR DATA FOR?

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We retain your data for the period strictly necessary to respond to your request for information about our products and services.

We will only process them for a longer period in cases expressly provided for by law or in order to pursue a legitimate interest of either ourselves or a third party or if you become our customer.

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## 10. HOW CAN YOU CONTACT US?

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These are the details for contacting us:

- Data controller: Intesa Sanpaolo S.p.A.
- Registered Offices: Piazza San Carlo 156 – Turin
- [dpo@intesasanpaolo.com](mailto:dpo@intesasanpaolo.com)
- [privacy@pec.intesasanpaolo.com](mailto:privacy@pec.intesasanpaolo.com)
- [www.intesasanpaolo.com](http://www.intesasanpaolo.com)

You may in any event contact any of our local branches: a list and contact details are available in the "Search for a branch" section of our website [www.intesasanpaolo.com](http://www.intesasanpaolo.com).

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## 11. WHO IS THE "DATA PROTECTION OFFICER"? HOW CAN YOU CONTACT HIM?

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The "Data Protection Officer" (DPO) is a guarantee officer that we have appointed, as expressly required by the GDPR. You may contact the DPO for all matters relating to the processing of your personal data and to exercise your rights under the GDPR, by contacting him at the following e-mail address: [dpo@intesasanpaolo.com](mailto:dpo@intesasanpaolo.com).

## 12. WHAT ARE YOUR RIGHTS?

The GDPR grants you the following rights:



**Right to object** (pursuant to Article 21 of the GDPR): if your personal data are processed by us for direct marketing purposes, you have the right to object to the processing and any profiling activities related to them at any time; if

you exercise this right, your personal data will no longer be processed for this purpose.

You can also exercise the right to object to the processing we carry out to perform tasks in the public interest, to exercise public powers or to pursue a legitimate interest of ourselves or third parties. In these cases, the processing will no longer be carried out unless there are reasons that oblige us to proceed or it is necessary to establish, exercise or defend a legal claim.



**Automated decision-making including profiling** (pursuant to Article 22 GDPR): normally we do not make decisions based solely on the automated processing of your personal data except

in specific areas and only when the decision is related to the conclusion or performance of a contract, is based on your explicit consent or is authorised by law.

In the first two cases (contract and consent) we guarantee your right to obtain human intervention, to express your point of view and to contest the decision.

You always have the right to receive meaningful information on the logic involved, as well as on the significance and the consequences of automated processing.



**Right of Access** (pursuant to Article 15 of the GDPR): you have the right to obtain confirmation as to whether or not personal data concerning you is being processed by us, to have information on the processing in progress and to receive a copy of the data.



**Right to Erasure** (pursuant to Article 17 of the GDPR): the GDPR provides for a series of cases in which you have the right to obtain the erasure of personal data concerning you (for example, if the data is no longer necessary for the purposes for which it was processed or if you have withdrawn the consent on which the processing is based and there is no other legal basis for processing it).



**Right to Restriction** (pursuant to Article 18 GDPR): the GDPR provides for a series of cases in which you have the right to obtain the restriction of the processing of personal data concerning you (for example, for the period necessary to carry out the appropriate checks on the personal data of which you have contested the accuracy).



**Right to Data Portability** (pursuant to Article 20 GDPR): the GDPR provides for a series of cases in which you have the right to receive the personal data that you have provided us with and which concern you in a structured, commonly used and machine-readable format. The GDPR also protects your right to transmit those data to another data controller without hindrance on our part.



**Right to Rectification** (pursuant to Article 16 of the GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you and the completion of incomplete data.



**Right to Lodge a Complaint** (pursuant to Article 77 of the GDPR): if you consider that the processing of your data by us is infringing the regulations on the processing of personal data, you have the right to lodge a complaint with the Supervisory Authority for the protection of personal data.

Your rights are described in the document "Focus on your rights" available in the "Privacy" section of the website [www.intesasanpaolo.com](http://www.intesasanpaolo.com).

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### 13. CONTACTS AND FORMS FOR THE EXERCISE OF YOUR RIGHTS

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In the "Privacy" section of the website [www.intesasanpaolo.com](http://www.intesasanpaolo.com) you will find a form that you can use to exercise your rights.

To exercise your rights, you may write to:

- [dpo@intesasanpaolo.com](mailto:dpo@intesasanpaolo.com)
- [privacy@pec.intesasanpaolo.com](mailto:privacy@pec.intesasanpaolo.com)
- Intesa Sanpaolo S.p.A., Piazza San Carlo, 156 – 10121 Turin.



You may also visit any of our branches.

We will carry out all the necessary actions and communications **free of charge**. Only if your requests are demonstrably unfounded or excessive, due in particular to their repetitive character, may we charge you a fee, taking into account the administrative costs incurred, or alternatively refuse to meet your requests.

Article 6.1(f) of **REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 (GDPR - General Data Protection Regulation)** authorises us to process personal data concerning you without the need to ask for your consent, where the processing is necessary for the pursuit of a legitimate interest of ourselves or third parties, provided that the interest does not override your interests or fundamental rights and freedoms.

With this document, we provide you with an up-to-date list of **legitimate interests** of ourselves or of those of third parties that we pursue in connection with our operations.

We remind you that, pursuant to Article 21 of the GDPR, you have the **right to object to the processing of personal data concerning you at any time, if the processing is performed for the pursuit of our interests, including profiling**.

Should you **object**, we will refrain from processing your personal data further unless there are legitimate reasons to proceed with the processing (reasons that override your interests, rights and freedoms), or the processing is necessary for the establishment, exercise or defence of legal claims.

For comprehensive information on the rights that the GDPR recognises in relation to the processing of your personal data, please refer to the "Focus on your rights" document in the "Privacy" section of the website [www.intesasanpaolo.com](http://www.intesasanpaolo.com).

List of legitimate interests:

- **safeguarding physical security**, understood as the security of people and company assets, including through the acquisition of images and videos in the context of video surveillance systems;
- **monitoring the security of IT systems** and networks to protect the confidentiality, integrity and availability of personal data;
- adoption of appropriate safeguards to **prevent fraud** and mitigate **other risks** (e.g. with regard to anti-money laundering) in compliance with legal obligations incumbent on the Data Controller;
- the exercise of a right in any place;
- **transmission** of personal data **within the group of companies** for internal administrative purposes;
- **processing of personal data belonging to third parties** in the context of the performance of agreements and/or contracts with the Bank's counterparties, inclusive of the pre-contractual phase;
- **management of corporate and strategic operations** such as, for example, mergers, demergers and sales of business lines;
- **development and updating of predictive and descriptive models** through the production of statistics and reports with the following aims:
  1. definition of new products and services;
  2. verification of the performance of products and services for their improvement;
  3. verification of the effectiveness of processes and/or the operation of units;
  4. data quality improvement;
  5. construction of general models of customer behaviour based on statistical analyses of quantitative/qualitative information with the aim of maintaining standards of the offer of products and services high enough to meet customer demands;
  6. improving user experiences on websites and apps.