PERSONAL DATA PROTECTION NOTICE

Updated on 12.05.2025.

1. YOUR PRIVACY

At **Intesa Sanpaolo** 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 them and for how long we store them. 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.

2. TO WHOM IS THIS NOTICE ADDRESSED?

This notice is addressed to the **freelance professionals** and **sole proprietorships** who have with us a **contractual relationship of supply and/or service** or who are in the process of establishing one.

This notice is also addressed to the **owners of sole proprietorships** and other **individuals** who, for various reasons are **associated with freelance professionals and companies** (even if they are not sole proprietorships) who have a contractual relationship with us for the supply of goods and/or services or who are about to establish one (for example, representatives, legal representatives, partners, beneficial owners and company representatives).

We may need to amend or supplement it, due to regulatory obligations or as a result of organisational changes. You can request the most up-to-date version at any time by using our contact details given in section 11 ("How can you contact us?").

3. WHAT IS DATA PROCESSING? WHO IS THE DATA CONTROLLER?

The GDPR defines "**personal data**" as "any information relating to an identified or identifiable natural person".

The GDPR also defines precisely what is meant by "**processing**", namely "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction".

As the "**Data Controller**", **Intesa Sanpaolo**, acting in full compliance with the principles of fairness, lawfulness and transparency, determines the means and purposes of each of these "operations" that involve, even only potentially, your personal data; it does all this while ensuring your confidentiality and fully protecting your rights.

4. WHAT PERSONAL DATA DO WE PROCESS?

The personal data we process and protect fall into the following categories:

a) personal data of the freelance professional:

- **identification and personal data,** such as the data on the identification document and the data contained therein (such as first name and surname, date and place of birth, residential address, gender, nationality), name, registered office, tax domicile, postal address, legal form, tax code and VAT number;
- **image data**, such as a photograph on an identification document;
- **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail addresses;
- **data on the profession** carried out and operations;
- **economic** and performance **data**;
- **Data on** existing or ongoing **relationships** with us;

b) personal data of the sole proprietorship:

- **identification and personal data**, such as name, registered office, tax domicile, postal address, legal form, tax code and VAT number;
- **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail addresses;
- **data on the activity** carried out and operations;
- **economic** and performance **data**;
- **data on** existing or ongoing **relationships with us;**

c) personal data of the owner of the sole proprietorship and of the natural person - other than the contact person - connected to the company (also in a form other than sole proprietorship):

- **identification and personal data**, such as the data on the identification document and the data contained therein (such as first name and surname, date and place of birth, residential address, gender, nationality) and the tax code;
- **image data**, such as a photograph on an identification document;
- **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail addresses;
- **data pertaining to the institutional role**;
- **data on** existing or ongoing **relationships** with us;

d) personal data of the company contact person

- **first and last name;**
- **data pertaining to the** corporate **role**;
- **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail.

5. WHY ARE WE ASKING YOU FOR YOUR DATA?

We need your data:

- to instruct, conclude and properly execute supply and/or service contracts
- to carry out monitoring activities;
- to fulfil legal obligations.

If you decide not to provide us with your data, we will find it impossible to establish supply and/or service relationships.

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

The data we process may be obtained:

Directly: if you communicated them to us on the occasions when you interacted with us;

Indirectly: if we have collected them from third parties or from sources accessible to the public (e.g. the Chamber of Commerce and Professional Registers), in compliance with the relevant regulations.

We take care of your data in any case: we process them using manual, computerised and telematic tools – including artificial intelligence systems, as defined by current regulations – and we guarantee their security and confidentiality.

7. WHAT IS THE BASIS FOR OUR PROCESSING? FOR WHAT PURPOSES DO WE PROCESS YOUR DATA?

The processing of personal data is only lawful if its purpose is supported by a valid legal basis, i.e. one of those provided for in the GDPR.

In accordance with the various legal bases provided, we will briefly explain to you the processing we carry out and the purposes for which we do so.

THE LEGAL BASIS	***OUR OBJECTIVES***
a) Contract and pre-contractual measures *(Art. 6.1(b) of the GDPR)*	We perform **the contracts** or actions relating to the **pre-contractual phases**.
b) Legal obligation *(Art. 6.1(c) of the GDPR)*	We comply with **regulatory requirements**, e.g. anti-corruption and anti-money laundering ones, as well as with **provisions of the Authorities**.
c) Legitimate interest *(Art. 6.1(f) of the GDPR)*	We pursue the **legitimate interests 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, physical security, security of IT systems and networks, prevention of fraud and the production of statistics. The complete list of the legitimate interests that we pursue is described in the annex "Legitimate interests".

8. WHO COULD RECEIVE THE DATA YOU PROVIDED US WITH?

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 recipients of your data may be:

- the **Authorities** and the parties to whom the communication of the data is due in compliance with regulatory obligations;
- **Intesa Sanpaolo S.p.A.** (where this does not coincide with the Data Controller);
- **third parties outside the Intesa Sanpaolo Group**, which carry out, by way of example and without limitation, the following activities:
  - provision and management of IT and telecommunications procedures and systems;
  - computer security;
  - physical security (e.g. guard and video surveillance services);
  - freelancing;
  - consultancy in general;
  - data management and archiving of documents (both paper and electronic).

The precise list of recipients of personal data is always available upon request using our references in section 11 ("How can you contact us?").

9. How do we protect your data when they are transferred outside the European Union or to international organisations?

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

- countries outside the European Union or international organisations that have been found by the European Commission to provide an adequate level of protection;
- other countries, in which case we rely on one of the "adequate safeguards" or one of the specific derogations provided for in the GDPR.

10. How long do we keep your data?

We keep your personal data for as long as is **strictly necessary** to fulfil the purposes for which they were collected.

Your personal data are stored, as a rule, for a maximum period of 10 years from the termination of the contractual relationship of supply and/or service.

We will process them for a longer period only in the cases expressly provided for by law or to pursue a legitimate interest of ourselves or of third parties.

11. How can you contact us?

These are the details for contacting us:

- **Data Controller**: Intesa Sanpaolo S.p.A.
- **Registered Office**: Piazza San Carlo 156 – Turin
- dpo@intesasanpaolo.com
- privacy@pec.intesasanpaolo.com
- www.intesasanpaolo.com

12. Who is the "Data Protection Officer"? How can you contact him/her?

The **"Data Protection Officer" (DPO)** is a guarantee figure that we have appointed, as explicitly required by the GDPR. You can contact the DPO for all matters relating to the processing of your personal data and to exercise your rights under the GDPR, by emailing dpo@intesasanpaolo.com

13. What are your rights?

Articles 15-22 and 77 of the GDPR grant you the rights set out below, which you may exercise in accordance with the specific features of the processing operations described in this notice:

Opposition (art. 21 GDPR): the GDPR allows you to object to the processing of your personal data under the conditions set out in the regulation, for example, in the case of processing carried out to pursue our or a third party's legitimate interest. In such cases, the processing will no longer be carried out unless there are reasons that oblige us to continue or it is necessary to establish, exercise or defend a right in court.

Portability (art. 20 GDPR): the GDPR provides for a number of cases in which you have the right to receive the personal data you have provided to us about yourself in a structured, commonly used and an automatic machine-readable format. The GDPR also protects your right to transfer these data to another data controller without hindrance on our part.

Automated decision-making process including profiling (art. 22 GDPR): we do not normally make decisions based solely on automated processing of your personal data except in specific areas and only when the decision relates to the finalisation or performance of a contract, when it 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 opinion and to object to the decision.

You always have the right to receive meaningful information on the logic used and the importance and consequences of automated processing.

Access (art.15 GDPR): you have the right to obtain confirmation as to whether or not personal data concerning you are being processed and to obtain information about the processing being carried out.

Deletion (art.17 GDPR): the GDPR provides for a number of cases in which you have the right to obtain the deletion of personal data concerning you (e.g. if the data are no longer necessary for the purposes for which they were processed).

Limitation (art. 18 GDPR): the GDPR provides for a number of cases in which you have the right to request the limitation of the processing of personal data concerning you (e.g. for the period necessary to carry out appropriate checks on personal data whose accuracy you have contested).

Rectification (art.16 GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you, and the integration of incomplete data.

Complaint (art. 77 GDPR): if you consider that your data are being processed by us in breach of the law on the processing of personal data, you have the right to lodge a complaint with the competent Data Protection Authority.

Your rights are described in the document "Focus on your rights", which is always available in the "Privacy" section of our website www.intesasanpaolo.com

14. CONTACTS AND FORMS FOR THE EXERCISE OF YOUR RIGHTS

In the "Privacy" section of our website 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
- privacy@pec.intesasanpaolo.com
- Intesa Sanpaolo S.p.A., Piazza San Carlo, 156 – 10121 Turin.

We will carry out all necessary actions and communications **free of charge**. Only if your requests prove to be manifestly unfounded or excessive, in particular due to their repetitive nature, may we charge you a fee, taking into account the administrative costs incurred, or refuse to comply with your request.

ANNEX 1 - LEGITIMATE INTERESTS

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.

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 the appropriate safeguards to **prevent fraud and mitigate other risks** (e.g. with regard to corporate administrative liability, anti-money laundering and anti-corruption) required to fulfil legal obligations of the Data Controller;

• **exercise and defence of a right** (including the right of claim), in any place;

• **transmission of personal data within the group of companies** for internal administrative purposes;

• **management of corporate and strategic transactions**, such as mergers, demergers and business unit sales;

• **development and updating of predictive and descriptive models** through the production of statistics and reports with the following aims:

1. verification of the effectiveness of processes and/or the operation of units;
2. data quality improvement.