



PERSONAL DATA PROCESSING

PRIVACY NOTICE

1. INTESA SANPAOLO WEALTH MANAGEMENT IS INFORMING YOU OF THE USE OF YOUR PERSONAL DATA:

The aim of this privacy notice is to inform you, in accordance with the data protection legislation (hereinafter, the "**Data Protection Legislation**"), and in particular with the European Union Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which came into force on 25 May 2018 (hereinafter, the "**Regulation**"), on the use we make of personal data when you use the website promoting the mobile application "FIDEURAM DIRECT", being an online banking and investment services platform launched by the Bank (the "**Application**") (the "**Website**"), on the reasons for which we use it and on the conditions under which we sometimes share it. It is also to inform you of the conditions and the period for which we keep such data. Finally, we would remind you of your rights regarding this data and the conditions under which you may exercise them.

In this document, the references made to "ISPWM", "the Bank", "we" and "our" include **Intesa Sanpaolo Wealth Management S.A.** a *société anonyme* incorporated under the laws of the Grand-Duchy of Luxembourg, having its registered office located at 28, Boulevard de Kockelscheuer, L-1821 Luxembourg, registered with the Luxembourg trade and companies register under number B117963 and authorised by the Luxembourg supervisory authority of the financial sector (the *Commission de surveillance du secteur financier*, the **CSSF**) as a credit institution under article 2 of the Luxembourg act of 5 April 1993 on the financial sector and **Intesa Sanpaolo Wealth Management – Belgium Branch, Succursale de / Succursaal van** Intesa Sanpaolo Wealth Management S.A., with registered office at Poortakkerstraat 9E, 9051 Ghent, Belgium and registered with the Crossroads Bank for Enterprises (Kruispuntbank van Ondernemingen/Banque-Carrefour des Entreprises) under number 0563.635.128 (RPR/RPM/RLE Ghent, division Ghent), registered in Belgium with the Banque Nationale de Belgique, located Boulevard de Berlaimont 14. 1000 Brussels, Belgium (the "**BNB**") (www.bnb.be) as a credit institution governed by the law of another Member State of the European Economic Area with a branch in Belgium and subject to prudential supervision by the BNB and the Autorité des services et marchés financiers ("**FSMA**") and, where appropriate and if the context so requires, any subsidiaries, branches, establishments, investment vehicles, representatives, subcontractors, service providers and/or delegates thereof, who may be situated in the European Economic Area (hereinafter, the "**EEA**") or outside it.

We would draw your attention to the fact that this notice may be amended, updated or supplemented from time to time (where appropriate, by any other document or procedure), in order to reflect any change in our practice concerning the processing of personal data and/or any change introduced into the Data Protection Legislation. We would also keenly encourage you to read this notice carefully and to regularly check any amendment that may subsequently be made.

Intesa Sanpaolo Wealth Management S.A.

28, Boulevard de Kockelscheuer L-1821 Luxembourg · P.O. Box 1106 L-1011 Luxembourg · R.C.S. Luxembourg B117.963

Intesa Sanpaolo Wealth Management - Belgium Branch Succursale de / Succursaal van Intesa Sanpaolo Wealth Management S.A. (Luxembourg)

Branch address: Poortakkerstraat 9E, 9051 Gent · Ph +32 (0) 9 321 21 21 · No. BCE / Nr. KBO (B): 0563.635.128 · VAT BE 0563.635.128

Permanent unit address: Chaussée de la Hulpe / Terhulpsesteenweg 166, 1170 Bruxelles/Brussel · Ph +32 (0) 2 233 83 51

2. WHO IS CONCERNED?

This notice applies to any natural person with whom we interact via the Website, particularly customers, prospects, and visitors to the Website (hereinafter, collectively referred to as "you", the terms 'you' and 'your' to be interpreted accordingly).

3. WHAT TYPE OF PERSONAL DATA DO WE PROCESS?

The data collected is limited to that required to achieve the purposes identified by the Bank, and particularly to promote the Application, to publish updates and announcements about the application, to deliver a newsletter to the interested public in order to contact and inform them about market views, educational contents in the investment field and commercial campaigns/initiatives of the Bank (the "**Newsletters**") and to answer to users inquiries (i.e. question, suggestion, need for support) submitted via the Website's "Get in touch" form or via our email addresses (support@fideuramdirect.lu or support@fideuramdirect.be).

We process the following personal data about you, which we obtain by your use of the Website. Personal data includes:

- Email address you provide us when you subscribe to the Newsletter;
- Email address, phone number, name and surname you provide us when you submit inquiries via the Website's "Get in touch" form;
- device information (browser, operating system);
- data technically transmitted when you access or browse our Website, notably obtained using cookies (e.g. date and time of access, language preferences, IP address, operating system used, number of visits, pages visited, trackers or page tags, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, browsing history, etc.). Please also refer to our clause 7 "Cookies" and our cookie policy for more information on data gathered using cookies;
- records of email exchanges if you contact us by email.

4. UNDER WHAT CIRCUMSTANCES ARE WE AUTHORIZED TO USE YOUR PERSONAL DATA?

We may process your personal data for the following purpose and on the following legal basis:

- For purposes in the Bank's legitimate interests

We may process your personal data based on a balance of interests to pursue our or third parties' legitimate interests, for the following main purposes:

- Administering, evaluating and improving our Website, products and services;
- Improving the performance and usability of our Website;
- Personalizing your experience on our Website to provide you with the best possible customer experience;
- Sending you updates and announcements about our Application "Fideuram Direct";
- Compiling statistics and conducting Website trends, performance and commercial analysis;
- Establishing, exercising and defending legal claims;
- Ensuring the safety and continuity of our IT services and systems.

- With Your consent.

In some cases, your consent is necessary for the Bank to be able to process your personal data. This will be the case in particular:

- for the subscription to our Newsletter;
- for being contacted via the Website's "Get in touch" form or via our client's support email addresses mentioned above;
- for the use of cookies.

5. **WHY AND WITH WHICH PERSONAL DATA RECIPIENTS MAY PERSONAL DATA BE SHARED?**

We may transfer personal data to:

- any of our subcontractors and/or delegates and, more broadly, service providers providing services on our behalf (including but not limited to IT or website services suppliers) for the management of the Website and of the subscription/unsubscription and sending of our Newsletter;
- other entities of the Intesa Sanpaolo group for commercial purposes;
- certain regulated professions such as lawyers for the management of legal claims.

Besides the obligations devolving upon them under the agreements signed with the Bank, third parties receiving personal data are also required to observe the obligations devolving upon them (as "Data Controller " or "Data Processor" where appropriate) under the Regulation and, more broadly, under the Data Protection Legislation.

Personal data may be transferred by the Bank outside the EEA solely under the conditions provided for by the legal or regulatory provisions applicable. In accordance with the Regulation, the Bank shall thus ensure that, for the territory in question, either a decision on suitability previously issued by the European Commission exists, or suitable guarantees enabling personal data protection to be ensured have been put in place.

Personal data may be transferred to the following countries located outside the EEA: United States of America.

6. **UNSUBSCRIBE**

To unsubscribe to the Newsletter, the user can click on the link included in every email sent with the newsletter. The email address used for the subscription and the associated personal data are then deleted according to our retention policy.

To cancel your request to be contacted via the "Get in Touch" form and/or to withdraw the consent for the processing of personal data collected via the "Get in Touch" form, the user shall contact client's support email addresses mentioned above.

7. **COOKIES**

A "Cookie" is a small piece of text that a Website places in the cookie file of your browser and that allows the Website to remember who you are.

Like many other websites, we use cookies to provide you with a safe, effective, and user-friendly Website. We also use cookies to compile certain information to assist us to determine visitors' preferences and trends in web browsing activity.

For more information on our use of cookies please refer to our cookie policy.

8. WHAT MEASURES ARE TAKEN TO PROTECT PERSONAL DATA?

The Bank adopts and maintains appropriate technical and organizational measures enabling it to ensure that it processes personal data in such a way as to guarantee appropriate security, and particularly to protect it against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

9. AM I OBLIGATED TO PROVIDE THE PERSONAL DATA?

In the context of our business and the functioning of our Website, data collected is limited to that required to achieve the purposes identified by the Bank: you only have to provide Personal Data that is necessary for us to reply to your requests or necessary for the Website to run properly.

However, without certain types of Personal Data (notably Personal Data necessary to be contacted or to subscribe to the Newsletter), we will not be able to offer you all of the services available on the Website, or duly reply to your requests or some parts of the Website may become inaccessible.

10. WHAT RIGHTS DO YOU HAVE AND HOW CAN YOU EXERCISE THEM?

In accordance with the Data Protection Legislation, you and/or, insofar as is permitted under the Data Protection Legislation, any natural person concerned with whom you maintain relations, hold several rights to your personal data, including:

- **Right to access** any personal data concerning you and a copy of such data;
- **Right to rectify your personal data** if you consider it to be incorrect or incomplete;
- **Right to obtain the deletion** of your personal data ("Right to be forgotten"), under the conditions and within the limits stipulated by the Data Protection Legislation (notably, the Bank will not erase your personal data if their processing is necessary, for example, to comply with a legal obligation, for reasons of public interest, for the establishment, exercise or defence of legal claims);
- **Right to request a restriction to the processing** of your personal data when the conditions set out by the Data Protection Legislation are met;
- **Right to object to the processing of your personal data**, under the conditions and within the limits stipulated by the Data Protection Legislation, for reasons connected with your particular situation, unless the Bank has compelling legitimate grounds for such processing or the processing is necessary for the establishment, exercise or defence of legal claims. You have the right at any time to object to the processing of your personal data for direct marketing purposes;
- **Right to withdraw your consent** to the processing of your personal data at any time;

- **Right to the portability of your personal data**, under the conditions and within the limits stipulated by the Data Protection Legislation, meaning that you may ask to receive such data in a structured, commonly used and machine-readable format in order to transmit it on to a third party.
- **Right not to be subject to a decision based solely on automated processing**, to obtain human intervention and to receive meaningful information on the logic involved, the significance and the consequences of automated processing.

If you wish to exercise one of the aforesaid rights or if you have any questions concerning the use of your personal data, please contact our Data Protection Officer, by email or letter to:

- Intesa Sanpaolo Wealth Management S.A.

Data Protection Officer

28, Boulevard de Kockelscheuer
L-1821 Luxembourg
Grand Duchy of Luxembourg
DPO@intesasnpaolowm.lu

In the interest of confidentiality and data protection, the Bank must be sure of your identity before responding to your request. The Bank will then endeavour to answer your request within a period of one (1) month as from receipt of the request. Depending on the complexity of the request or the number of requests to be dealt with, the Bank may increase this period of two (2) months, provided you have been informed in advance.

The Bank reserves the right to refuse any request for which it is unable to identify its author in a way satisfactory to it or if it considers the request to be excessive or unfounded. You will then be informed of the reasons for refusal within a period of one (1) month as from receipt of the request.

The Bank may also require the payment of reasonable fees in the case of unfounded or excessive requests, especially if they are repetitive.

If you are not satisfied with the processing of personal data or with the handling of a request sent to the Data Protection Officer, you may file a complaint with:

- the National Data Protection Commission, the authority responsible on Luxembourgian territory for checking and verifying the legality of the collection and use of data subject to processing, by writing to 15, Boulevard du Jazz, L-4370 Belvaux, Grand Duchy of Luxembourg, or via the website www.cnpd.public.lu.7; or
- the Gegevensbeschermingsautoriteit / Autorité de Protection des Données, the authority responsible on Belgian territory for checking and verifying the legality of the collection and use of data subject to processing, by writing to Rue de la Presse 35, 1000 Bruxelles or sending an email to contact@apd-gba.be; or
- Any other European data protection authority (i.e. in your country of residence).

11. HOW CAN YOU CONTACT US?

If you have any questions on the use of your personal data, you may contact our Data Protection Officer, by email or letter to the following address:

- Intesa Sanpaolo Wealth Management S.A.

Data Protection Officer

28, Boulevard de Kockelscheuer
L-1821 Luxembourg
Grand Duchy of Luxembourg
DPO@intesasnpaolowm.lu