



**INFORMATION PURSUANT TO ARTICLES 12,13,14 OF THE EUROPEAN GENERAL REGULATION No. 679/2016 CONCERNING THE PROTECTION OF NATURAL PERSONS WITH REGARD TO TREATMENT OF PERSONAL DATA**

With the following information, we would like to give you an overview of the Bank's processing of your personal data and the rights that arise from data protection. What data is processed in each case and how it is used depends on the products and services requested or agreed from time to time.

**1. Who is the Data Controller and to whom can I turn?**

The Office of the Data Controller is as follows:

Deutsche Bank S.p.A.  
Piazza del Calendario, 1/3  
20126 Milan  
Telephone: (02 4024.1)  
E-mail address: deutsche.bank@db.com

You can contact the Company Data Protection Officer at the following address:

Deutsche Bank S.p.A.  
Data Protection Officer  
Piazza del Calendario, 1/3  
20126 Milan  
Telephone: (02 4024.1)  
Email address: protezione.dati@db.com

**2. What sources and data we use**

We process personal data that we obtain from our clients as part of our business relationship. In addition – where necessary for the performance of our activities and services – we also process personal data that we have obtained from other Deutsche Bank Group companies or from other external companies (e.g. entities that detect financial risks, so-called "Credit Reporting Systems" for the purposes of limiting credit risk, hereinafter also referred to as "CRS") exclusively for authorisations in our possession in the context of normal banking and financial activity (e.g. for execution of orders, performance of contracts, or in the event that this has been permitted by you). We also process personal data that we have obtained from third-party sources accessible to the public (e.g., debtor lists, business and trade registers, the press, the media, the Internet) to the extent that this is permissible and limited by the authorizations in our possession.

Significant personal data in the context of the management of clients and potential clients - when opening and during the course of the contractual relationship - are:

- name, address/other contact information (phone number, e-mail address), date/place of birth, gender, national origin, family status, professional activity, professional category code/type of working arrangement (employee/independent), housing status (leasing/ownership), identification data (e.g. identity document data), authentication data (e.g. facsimile signature), tax code, banking and payment references and findings revealed by the CRS.

The Bank, with the express consent of the interested party, may also process particular categories of personal data.<sup>1</sup>

**Digital Services**

With regard to data processed using digital tools, please refer to the additional information available on data protection in the context of these services.

**3. Why are we treating your data (purposes of processing) and on what legal basis**

We process personal data in accordance with the provisions of EU General Regulation No. 679/2016 on data protection (hereinafter also "GDPR"):

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<sup>1</sup> These are personal data that are capable of revealing: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data to uniquely identify an individual, data relating to the health or sex life or sexual orientation of the person. Deutsche Bank S.p.A. - Registered Office and General Management: Piazza del Calendario, 3 - 20126 Milan - Tel: 02.4024.1 - Telegraphic address: CENTMERIT Milan - www.db.com/italia - S.W.I.F.T. address: DEUT IT MM - Telex: 311350 BAIDIR I - Fax: S.T.M.: 02.4024.2636 - certified e-mail: [dbspa3@actaliscertymail.it](mailto:dbspa3@actaliscertymail.it) - Share capital €412,153,993.80 - Registration no. with Milan Companies Register, tax code and VAT no.: 01340740156. Member of the Interbank Fund for the Protection of Deposits - Member of the National Guarantee Fund pursuant to Art. 59 of Legislative Decree No. 58/1998 - Entered in the Register of Banks and parent company of the Deutsche Bank Group, entered in the Register of Banking Groups - Subject to the management and coordination of Deutsche Bank AG - Code Az. 3104.7



**a. The processing is necessary for the execution of a contract of which the interested party is a party [Art. 6 (1) b]**

The processing of personal data occurs in the execution of banking transactions and the provision of investment services as part of the fulfilment of the Bank's contractual obligations to clients or in the execution of the pre-contractual measures following your request. The purposes of data processing relate to the product/service and include, among other things, analysis of needs, consultancy, administration and financial assistance, as well as execution of transactions. Further details regarding the purpose of data processing can be derived from contractual documentation and economic conditions.

**b. To pursue the legitimate interests of the data controller [Article 6(1)(f) GDPR]**

If necessary, we also process your data beyond mere contractual performance to safeguard our legitimate interests or those of third parties, for example:

- Consultation and exchange of data with credit rating agencies (e.g., C.R.S.) to determine solvency, risk of default.
- Verification and optimisation of the procedure for analysing requirements and direct customer interviews, including customer segmentation and calculation of likelihood of entering into an agreement.
- Advertising or market research and opinion polls, to the extent that you have not objected to the use of the data.
- Assertions of legal claims and defence in the event of disputes.
- Guarantee of IT security and IT activity by the Bank.
- Preventing the commission of crimes.
- Measures for the safety of buildings and installations.
- Business management measures for services and products.
- Risk management within the group.

**c. Based on the consent expressed by the interested party [Art. 6 (1) (a) GDPR]**

If you have given us your consent to the processing of personal data for certain purposes (e.g., the transmission of data within the Deutsche Bank AG organisation and group), the lawfulness of the processing is created through your expression of consent.

If you have given us your consent, your personal data will be processed for legal purposes (in conjunction with legal obligations, regulations, Community legislation, supervisory and control provisions also relating to the Central Credit Register; usury law, anti-money laundering law, etc.) and contractual purposes (connected and instrumental to the acquisition of information prior to the conclusion of the contract to which the interested party is a party, and to the performance of said contract for the management of payments, and the keeping of the accounts for the production of internal statistics, etc.).

If you have given us your consent, your personal data will also be processed for the purposes of information and commercial investigation and profiling (i.e. to provide information on products and/or services and/or initiatives of the Bank, the Deutsche Bank Group, the Deutsche Bank AG Group and/or third parties, or to conduct market research, including by e-mail and/or SMS and/or with an automated telephone operator, also to check the quality of the products and/or services offered by the Bank and/or group companies and the degree of satisfaction of the interested party in relation to them, as well as the to better understand your needs, interests and/or desires).

The express consent may be revoked at any time. This withdrawal is valid for the future and does not apply to previous treatment of the data. You may request the list of your consents at any time.

**d. To fulfil a legal obligation [Article 6(1)(c) of the GDPR] or for the performance of a task in the public interest [Article 6(1)(e) of the GDPR]**

In addition, as a banking institution, we are subject to various legal obligations, meaning legal requirements (e.g., credit reporting system law, money laundering law, securities trading law, tax law) and banking supervision rules (e.g., European Central Bank, Bank of Italy and Consob). The purposes of processing include checking creditworthiness, identity and age, preventing fraud and money laundering, fulfilling tax control and reporting obligations, and assessing and managing risks within the Bank and within the group.



#### 4. Personal Data Recipients: Who gets my data?

Inside the Bank, the offices that have access to your data<sup>2</sup> are those that have need for said data to fulfil our legal and contractual obligations. For these purposes, the companies in the group to which we belong (Deutsche Bank AG), and the service providers and collaborators that we use, may receive data in accordance with the principles of confidentiality and our written guidelines on data protection. These are essentially companies or certain categories of Italian and foreign entities<sup>3</sup>.

With regard to the transmission of data to recipients outside the Bank, it must be borne in mind that we, as a banking institution, are bound by the obligation of confidentiality regarding the facts and assessments relating to clients of which we are aware.

#### 5. Are data transmitted to foreign countries or international organizations?

The transmission of data to countries outside the EU or the European Economic Area (so-called third countries) is only done if it is required by law to execute your orders (e.g., payment orders and securities trading orders). In the event that third-country service providers are employed, they are required to comply with the European data protection standards agreed to by way of European treaties, subject to standard contractual clauses provided for by the European Commission and compliance with further specific written instructions.

#### 6. How long are my data stored?

We process and retain your personal data for the period necessary to fulfil legal and contractual obligations. It is necessary to take into consideration that our business relationship is a continuing contractual obligation established on a multi-annual basis.

If the data is no longer required for the purposes of contractual or legal obligations, it is deleted on a regular basis, except where processing is required for the following purposes:

- Fulfilment of data retention periods under civil, commercial and tax law.
- Preservation of evidence in the context of provisions concerning the statute of limitations.

#### 7. What data protection rights do I have?

Each person concerned has the right to ask the Data Controller about:

- access;

<sup>2</sup> The offices and/or staff of the Bank's branches and/or Divisions, Service Departments and Units which process data using manual, IT and/or otherwise automated tools - according to a logic strictly related to the purposes of processing - in any case, do so in such a way as to ensure the security and confidentiality of such data.

<sup>3</sup> In particular:

- persons performing activities instrumental to the management of the relationship with the interested party (for example: services for the acquisition, registration and processing of data originating from documents or supports provided by the interested party and involving mass processing of payments, bills, cheques and other securities; transmission, printing, enveloping, transportation and sorting of the communications addressed);
- individuals, including those belonging to the DB Group (for example: Finanza & Futuro Banca S.p.A. or Fiduciaria S. Andrea S.r.l.), which provide banking, financial, insurance and/or investment services (for example: parties involved in the management of payment services; companies whose products or services are distributed by the Bank; companies that distribute the products of the Bank; other banks, financial intermediaries or investment firms);
- entities that determine financial risks ( so-called "credit reporting systems") to contain credit risk, such as:
  - CRIF S.p.A., with registered office at Via M. Fantin 1-3, 40131 Bologna. (which collects information on financing relationships regardless of the existence of defaults in repayments);
  - CTC - Consorzio per la Tutela del Credito [Consortium for the Protection of Credit], with registered office at Viale Tunisia 50, 20124 Milan (which collects information only on financing relationships in default or distress);
  - Experian Information Services S.p.A., with registered office at Via Carlo Pesenti, 121, 00156 Rome (which collects information on financing relationships regardless of the existence of defaults in repayments);
  - Cerved Group S.p.A., with registered office at Via San Vigilio 1, 20142 Milan (which manages credit reporting system of both positive and negative information);

for more information on the processing of data carried out under the above credit reporting systems, please refer to the document entitled *Codice di deontologia e di buona condotta per i sistemi gestiti da soggetti privati in tema di crediti al consumo, affidabilità e puntualità nei pagamenti - INFORMATIVA* [Code of Ethics and Conduct for Systems Operated by Private Parties in the Field of Consumer Credit, Reliability and Punctuality of Payments – REPORTING], - a copy of which is delivered separately to the interested party and is also available to all employees of the Bank.

- entities engaged in debt recovery or collection activities;
- persons managing national and international fraud control systems against banks, financial intermediaries and financial entities;
- factoring companies, or other entities for purposes related to securitisation or assignment of receivables or legal relationships with the interested party;
- independent auditors and other consultants for the Bank;
- companies of the DB Group; DB AG and companies of the DB AG Group (the disclosure of the personal data of the interested party to such persons is due to the fact that the Company is controlled by DB AG and is therefore a member of the DB AG Group, and is intended to enable DB AG to report, by virtue of regulatory obligations, to the administrative and judicial authorities to which it is subject, or to monitor the management of financial risks, as well as the sound and prudent management of itself and of the entities belonging to the DB AG group);
- company trade union representatives and, where applicable, coordinating bodies of the latter;
- a company that processes personal data in order to manage transactions or competitions with rewards or loyalty programs related to the use of the products or services requested by the person concerned, or business investigations;
- administrative and judicial authorities.



- corrections;
- deletion;
- treatment restrictions;
- objections;
- data portability.

You may revoke your consent to the processing of your personal data at any time. It should be noted that the withdrawal is valid for the future and does not apply to previous treatment.

There is also the right to lodge a complaint with the data protection supervisory authority.

#### **8. Do I have an obligation to make the data available?**

As part of the business relationship, you must make available the personal data that is necessary for the conclusion of the contract or that we are required by law to collect. In the absence of such data, we are obliged to refuse the entering into or execution of the contract or to interrupt or terminate the continuation of the existing contract.

In particular, we have an obligation under the Money Laundering Act to identify you, for example, by means of the identity document and to request you that to indicate your name, your place and date of birth, your nationality and your residence address, and to preserve this information. In order to fulfil these legal obligations under the Money Laundering Act, you are required to make the necessary information and documentation available and to report any changes that occur during the course of the business relationship without delay. In the absence of the necessary information and documentation, we shall be unable to accept or continue the business relationship.

#### **9. To what extent is there an automated decision-making process (including profiling)?**

We do not use an exclusively automated decision-making process under Article 22 of the GDPR to establish and implement the business relationship. If we were to use such a procedure, we would provide you with specific information, where permitted by law.

#### **10. Do you carry out “profiling”?**

We process your data in part in an automated manner in order to assess certain personal aspects (profiling, in particular, in order to analyse or predict aspects relating to economic situation, personal preferences, interests, reliability, behaviour, location or movement). We use profiling, for example, in the following cases:

- To comply with the law, we must combat money laundering and fraud. Data assessments are also carried out in this area (for example, in payment transactions). These measures also serve to protect you.
- To inform and advise you in a targeted manner about certain products, we use assessment tools that allow us to communicate and advertise products in a way that suits your needs, including through market research and opinion polls.
- As part of the credit assessment, where we determine a scoring. By this method, we calculate the probability that a client will fulfil the financial commitments that he/she made when he/she entered into the contract. For the purposes of this calculation, the following information may be used, by way of example: income situation, expenses, debts incurred, the type of work performed, the employer, the duration of the employment relationship, the experience derived from any previous business relationship, the reimbursement of previous debts in accordance with the provisions of the contract and data provided by credit reporting agencies. The scoring is based on a recognized and tested mathematical-statistical method.

### **Information on the right to object under Article 21 of the EU General Data Protection Regulation (GDPR)**

#### **1. Right of appeal relating to a single case**

You have the right at any time, for reasons arising from contingent circumstances, to object to the processing of personal data carried out on the basis of Article 6(1)(e) of the GDPR (Data processing for the performance of a task in the public interest) and Article 6(1)(f) of the GDPR (Data processing for the pursuit of the legitimate interest of the data controller); this also applies to profiling under the provisions of Article 4 no. 4 of the GDPR.

If an objection is lodged, we will no longer process the personal data that is the subject of the objection, except in the event that we are able to demonstrate reasons that must be compulsorily protected and that predominate over your interests, rights and freedoms or if the processing is intended to enforce, exercise or defend a right in court.

#### **2. Right to object to data processing for advertising purposes**

In some cases we process your personal information to conduct direct marketing. You have the right at all times to object to the processing of personal data for advertising purposes. This also applies to profiling, insofar as this is related to direct marketing.



If an appeal is lodged, we will no longer process your personal data that is the subject of the objection for the purposes mentioned above.

**The objection may be submitted informally and should preferably be directed to:**

**Deutsche Bank S.p.A.**

**Piazza del Calendario No. 1/3**

**20126 MILAN**

**Tel. 02 4024.1**

**E-mail address: [protezione.dati@db.com](mailto:protezione.dati@db.com)**