

INFORMATION NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION EU 2016/679 AND THE EXISTING NATIONAL REGULATION ON PROTECTION OF PERSONAL DATA

Pursuant to Regulation EU 2016/679 (hereinafter, "GDPR Regulation" or "GDPR") and the existing national regulation on data protection (hereinafter, together with GDPR, "Privacy Law"), MBPS LEASING S.p.A. with registered office in Milan, Via Siusi, n.7 (hereinafter, the "Company" or "the Controller"), as data controller, shall provide disclosure in relation to the use of personal data.

As a general rule, personal data held by the Company are collected directly from the data subject and occasionally may be provided from third parties (e.g. credit or debit transactions disposed by the data subject or by other subjects or where the Controller acquires data from external Companies for commercial purposes, for market research, products or services direct offers). This information notice also concerns personal data collected from third parties.

In case of data which are collected from third parties, sources are Monte dei Paschi di Siena Group companies, external companies for commercial information purposes, for market researches, products or services direct offers, public or private databases for financial and commercial risk monitoring; mainly biographical, financial and judicial data.

a) Purpose of the processing and why your personal data is required

All personal data are processed, in compliance with legal provisions and privacy obligations, for purposes strictly connected and necessary for the following purposes:

- I. Purposes connected with law obligations, regulations, European laws, and instructions from competent Authorities or Supervisory and control or bodies. Providing personal data for these purposes **is mandatory**. Failure to provide Your personal data will prevent the Company from executing the activities requested by You which entail compliance with law obligations from the Company itself. The legal ground for process may be found in the fulfilment of the legal obligations to which the Company is subject.
- II. Purposes that are strictly connected and functional to the execution of contractual obligations, the fulfilment, before the conclusion of the contract of specific requests from the data subject and judicial and/or non-judicial disputes (i.e., warning letters and activities relating to the enforced recovery of credit, etc.). Providing personal data for these purposes is mandatory because necessary for the execution of contractual obligations. Failure to provide Your personal data will prevent the Company from satisfying Your pre-contractual/contractual requests and executing the contract. The legal ground for process may be found in the necessity to execute the contract with the Company.
- III. Purposes connected with the detection of the clients' level of satisfaction on quality of services and activities provided by the Company (executed directly or through specialized companies), with the promotion and selling of the Company products and services via letter, telephone, advertising material, electronic communications, market research activities, tailored invitations and complimentary, public relation activities, also focused or customized, including the involvement of companies that provide activities of transmission, packaging, transportation and sorting of communications to clients, and also in relation to the communication of such data to the Monte dei Paschi di Siena Group companies. Provision of your consent for these purposes is not mandatory. Failure to provide Your consent will not impact the fulfilment of Your requests and the execution of Your contracts but will prevent the Company from sending commercial communications. The legal ground for process may be found in the consent expressed from You.
- IV. Purposes connected with market research and products and services offered by other companies of Monte dei Paschi di Siena Group, and the carrying out of public relations activities, also focused and/or customized, from other companies of Monte dei Paschi di Siena Group. Provision of your consent for these purposes is not mandatory. Failure to provide Your consent will not impact the fulfilment of Your requests and the execution of Your contracts but will prevent the Company from sending commercial communications. The legal ground for process may be found in the consent expressed from You.
- V. Credit risk survey; in relation to this particular process the Company provides You, as required by law, with the below specific information notice mentioned in the "*Code of conduct and professional practice applying to information systems managed by private entities with regard to consumer credit, reliability, and timeliness of payments*", published in the Official Journal n. 300 dated 23 December 2004. Providing personal data for these purposes is mandatory. Failure to provide Your personal data will prevent the Company from providing You the financing. The legal ground for process may be found in the necessity to execute the contract with the Company.
- VI. Purposes that are liaised and functional to the management of relations with suppliers, customers, warrantors/joint liable in any capacity (e.g. acquisition of preliminary information in connection with arranging supply contracts, financial and operating lease, financing agreement, insurance contracts, performing a service or one or more transactions contractually agreed, managing of payment/debit systems, debts and assets recovery, risk mitigation through centralised information systems). Providing personal data for these purposes is mandatory because necessary for the execution of contractual obligations. Failure to provide Your personal data will prevent the Company from satisfying Your pre-contractual/contractual requests and executing the contract. The legal ground for process may be found in the necessity to execute the contract with the Company.

b) Legal ground

Legal ground is in compliance with laws, execution of contractual obligations or express consent of the data subject.

c) Process logics

Your personal data will be processed, in compliance with Privacy Law provisions, through paper, IT and automated tools with logics strictly connected to the aforementioned purposes and, in any case, in order to guarantee the security and confidentiality of the data in accordance with Privacy Law.

d) Categories of data processed

In relation to the purposes described above, the Company processes Your personal data such as i.e. name, surname, address, telephone number, email address, date of birth, identity card, health insurance card, fiscal code, civil status, nationality, customer code, data relating to credit requests / reports, accounting data.

e) Communication and dissemination of data

In order to achieve the purposes listed under letter a), Your personal data will be communicated to the Company employees acting as authorized delegate of processing.

Moreover, Your data may be communicated to:

- a) other Group companies;

- b) providers of support services for the execution of Your instructions and for the management of payment services;
- c) providers of activities such as issuance, offering, placement, trading, custody of banking, financial and insurance products and/or services;
- d) providers of activities such as preliminary investigation, evaluation, provision, collection and insurance of receivables;
- e) providers of transmission, packaging, transport and sorting services for communications to clients;
- f) other entities of which the Company makes use for different purposes while providing the requested product or service;
- g) managers of IT systems used by the Company to process data subject's personal data;
- h) entities providing credit recovery services or providing professional advisory, tax, legal, judicial advisory;
- i) entities providing auditing services and account certification;
- j) authorities, supervisory, control bodies and other private or public subjects with public functions;
- k) third parties operating as providers of payment initiations or account information services;
- l) marketing and market research companies;
- m) entities monitoring financial risk in order to prevent insolvency, such as for example Bank of Italy, Experian Italia S.p.A. and Assilea – Associazione Italiana Leasing (in this regard, see the "Code of conduct and professional practice applying to information systems managed by private entities with regard to consumer credit, reliability, and timeliness of payments" attached below as well);
- n) entities managing fraud prevention against banks and financial intermediaries;
- o) database established at Economic and Finance Ministry (hereinafter, "MEF"), according to articles 30-ter, par. 7 and 7-bis, and 30-quinquies, of Italian Legislative Decree 13 august 2010 n. 141, only for the prevention of identity theft. Results of data identity verification procedure will not be disclosed, but might be communicated to Authorities and Surveillance and Control bodies;
- p) members of the Consorzio Corporate Banking Interbancario (CBI) and/or providers or related services;
- q) to lead international financial transactions and/or certain specific national transactions ordered by clients it is necessary to use the international messaging service managed by SWIFT (Society for Worldwide Interbank Financial Telecommunication), that temporarily stores a copy of all data necessary for the execution of transactions (e.g. originator and beneficiary names, bank coordinator, amount, etc.). Such personal data are stored in a company server located in the United States. That server is accessible for American competent Authorities (in particular, Treasury Department) for counter-terrorism purposes (data protection information available at <http://www.swift.com>);
- r) other Group financial intermediaries in case Your transactions are considered to be "suspicious" under Anti-money Laundering Directive.

A full and updated list of the Company's processors that might receive Your personal data is available at www.mbpsleasing.it – "Privacy" section.

Your personal data might be transmitted outside the European Union only following an adequacy decision by the European Commission or in presence of adequate safeguards under Privacy Law (including binding corporate rules and standard data protection clauses).

Personal data processed by the Company are not subject to dissemination.

f) Data retention

In accordance with the principles of proportionality and necessity, personal data will be stored in a form that allows the data subject identification for a period of time not exceeding the achievement of the purposes for which they are processed, therefore taking into account:

- the need to continue to retain personal data collected for the purpose of offering the services agreed with the user or protecting the legitimate interest of the Controller, as described in the above-mentioned purposes, in accordance with evaluations carried out from MBPS LEASING S.p.A.;
- the existence of specific regulatory obligations (Italian Civil Code, Anti-money-laundering Regulation, investment services Regulation, tax monitoring law, regulatory technical standards of the European Banking Authority etc.) or contractual obligations that require data processing and retention for specific periods of time.

In any case, for all the processing purposes indicated, the retention terms provided for by the law will be respected, except in the case in which no causes for interruption have occurred (eg cause, complaint in progress) and unless the law in force pro tempore does not set different terms.

g) Data subject rights

The individuals to whom personal data refers have the right at any time to obtain confirmation of the existence or not of their data and to know its content and origin, verify its accuracy or request its integration or update, or correction (art. 15 and 16 of GDPR).

In addition, data subjects' rights may refer to request cancellation, limitation of processing, withdrawal of consent, data portability and to file a complaint to the Supervisory Authority and to oppose in any case, for legitimate reasons, to their processing (art. 17 et seq. of GDPR).

The rights are exercised by means of written communication to be sent to: privacy@mbpsleasing.it



The Controller and the DPO, also through designated facilities, will take charge of Your request and provide You, without undue delay, with the information related to actions taken regarding Your request.

h) Controller and Data Protection Officer

The Controller is MBPS LEASING S.p.A. with registered office in Milan, Via Siusi, n.7.

The Data Protection Officer is available at the following addresses DPO.mediobanca@mediobanca.com and dpomediobanca@pec.mediobanca.com.

MBPS LEASING S.P.A.

I, the undersigned, (name) _____ (surname) _____ hereby declare:	
In relation to marketing purposes, referred to letter A), point III, aware that the consent is functional to MBPS LEASING S.p.A. for providing the related services:	
<input type="checkbox"/> I provide the consent	<input type="checkbox"/> I do not provide the consent
	
to the treatment above.	
Date, _____	_____ Signature
In relation to purposes connected with market research and products and services offered by other companies of Monte dei Paschi di Siena Group, referred to at letter A), point IV, aware that the consent is functional to MBPS LEASING S.p.A. for providing the related services:	
<input type="checkbox"/> I provide the consent	<input type="checkbox"/> I do not provide the consent
	
to the treatment above.	
Date, _____	_____ Signature

ACKNOWLEDGMENT OF RECEIPT OF PRECONTRACTUAL INFORMATION UNDER THE LEGISLATION ON BANKING TRANSPARENCY

TO SIGN IN CASE OF FINANCIAL LEASE ONLY

I declare I have received the "Information Sheet" and the practical guidelines on ABF (in Italian).

Date, _____



_____ Signature

CODE OF CONDUCT AND PROFESSIONAL PRACTICE

HOW YOUR DATA ARE USED

The hereby information notice under artt. 13 and 14 of EU Regulation 2016/679 (GDPR) is made also on behalf of credit information systems

Dear Customer,

as Data Controller, MBPS LEASING S.p.A. informs You that in order to provide the requested funding we use some of Your data collected directly from You or through specific databases.

These databases (Credit Information Systems) shall include information on the regular payment of the instalments and be consulted for assessing Your reliability and Your credit risk. Databases are managed and/or shared by private entities listed in Credit Information Systems' information notices.

Information will be stored at MBPS LEASING S.p.A.; some data, provided by You alongside with information based on the respect of Your layaway plan – originated by our financing - might be periodically communicated to Credit Information System¹. Therefore, other banks and financial intermediaries, whom you may ask financing, loans, etc., may be aware that You have submitted a financing request, that You might have additional loans or financing running and whether Your instalments are regularly paid.

The processing of this data is mandatory because necessary for the execution of contractual obligations; then, without this data, useful for Your reliability assessment, we cannot carry on the financing process.

The database information storage is executed on the bases of the data controller interest to consult Credit Information Systems.

Processing carried out by MBPS LEASING S.p.A.

Your data will not be transferred outside the EU or to international organizations. If required, for technical and/or operative reasons, the Company may transfer Your personal data to extra EU country and/or International organisms following "adequacy" decision by the European commission or in presence of adequate safeguards or specific derogations pursuant articles from 46 to 49 of Privacy Law.

According to the terms and limits set down by existing regulation, You have the right of being aware of Your data, and exercise Your rights - as provided for in articles from 15 to 22 of GDPR – related to the usage of Your data (update, correction, elimination, etc.)

You can propose complaints to the Data Protection Authority for the protection of Your data (www.garanteprivacy.it) and resort to the other instruments under the applicable regulation.

Your data are stored at MBPS LEASING S.p.A. and used for the financing management and for the fulfilment of the legal obligations (e.g. art. 2220 of the Italian Civil Code on retention of accounting entries).

For any requests concerning Your data, we suggest You to use the online format downloadable at www.garanteprivacy.it and address it to our Company:

MBPS LEASING S.p.A.	Via Siusi, n.7 – 20132 Milano – tel. 02.748221 – mail: privacy@mbpsleasing.it
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and/or to the companies below to whom we transfer Your data:

Assilea – Associazione Italiana Leasing
Experian Italia S.p.A.

Please find herewith below their address and additional clarification.

Your data might be processed by means of computer tools used for the decision of credit requests if it is required for the conclusion or execution of the contract.

MBPS LEASING's Data Protection Officer is available at the following addresses DPO.mediobanca@mediobanca.com and dpomediobanca@pec.mediobanca.com.

Processing carried out by Credit Information Systems

In order to proper evaluate Your credit risk, we may transfer some data (biographical data, potential joint debtors', type of contract, credit amount, terms of repayment) to credit information systems, ruled by "Code of conduct of professional practice" (as amended and integrated by the Data Protection Authority with the Provision n. 163 dated 12 September 2019, available for the consultancy on the website www.garanteprivacy.it). These Systems act as Data Controller and they make information available to private entities as stated in the Credit Information Systems' information notices.

Data are periodically updated with any new information gained in during the financing relation (trend of payment, financial exposure, status of the relationship).

In the framework of credit information system, Your data will be processed through ways of organising, comparison and processing strictly necessary to the purposes described above, and, particularly, for the extraction of Your data from databases. Processing will be carried out by means of computer tools, telematic system and manually in order to guarantee information security and confidentiality also in case of means of distance communication.

¹ Such data, in compliance with the provisions of Guarantos Authority, are:

- a) biographical data, VAT number or social security number;
- b) general data on the requested financing: type of contract, credit amount, payment method, financing status, terms of repayment, request status or execution of the contract;
- c) accounting information, debt exposure;
- d) potential joint debtors' information, information on collection activity, loan disposal or on events occurred on the client's assets.

Your data are subject to specific statistical treatment, aimed to provide You with a grade or score of Your credit reliability and solvency (i.e. credit scoring), considering mainly the following information: specific and number of the credit relationships in place, trend and payment history of outstanding and paid off relationships, existence and peculiarity of new credit requests, credit relationship settled history.

Additional information may be provided in case of credit request refusal.

The credit information system joined by MBPS LEASING S.p.A. are managed by:

1. IDENTIFICATION DETAILS: Data Controller: Assilea – Associazione Italiana Leasing
 Data Processor: Assilea Servizi Srl. (totally participated by Assilea, Associazione Italiana Leasing) with registered office in Via Massimo d'Azeglio n. 33 – 00184 Roma (tel. 06.9970361, fax 06.45440739), email postabdcrcr@assilea.it; certified email bdcrcr@pec.assilea.it
CONTACT DETAILS: relating to requests aimed to access to Your personal data, please follow the indication available on the website www.assilea.it
SYSTEM TYPE: BDCR – Banca Dati Centrali Rischi Assilea is a credit information system both positive and negative;
DATA RETENTION PERIOD: in accordance with the schedule below;
USE OF AUTOMATED SYSTEM OF CREDIT SCORING: yes;
PRESENCE OF AUTOMATED DECISION MAKING PROCESS: no.

2. IDENTIFICATION DETAILS: Experian Italia S.p.a. with registered office in Piazza dell'Indipendenza, 11/b, 00185 Rome;
CONTACT DETAILS: Consumer Protection Service tel. 199183538, fax. 199101850, Data Protection Officer, dpoitaly@experian.com, website www.experian.it (Consumers Area);
SYSTEM TYPE: positive and negative;
PARTICIPANTS: persons participating at the system in compliance with the code of conduct and other persons participating at prevention systems pursuant to subparagraph 5 of art. 30-ter, D. Lgs. 141/2010 ("Scipafi");
DATA RETENTION PERIOD: in accordance with the schedule below;
USE OF AUTOMATED SYSTEM OF CREDIT SCORING: yes;
PRESENCE OF AUTOMATED DECISION MAKING PROCESS: yes;
OTHERS: Experian Italia S.p.A. for purposes related to the reliability testing, the financial situation and preventing deceptions, process data from public records and takes part, as indirect participant, to Scipafi system. Data are stored in the European Economic Area – EEA (the main server is located in UK). If data are subject to processing operations by entities outside the EEA, transfers are made to countries for which there is an adequacy decision by the European Commission, i.e. they are based on the Standard Data Protection Clauses adopted by the European Commission or international programs for free circulation of data (e.g. EU-US Privacy Shield Framework). Further information details are available on the website www.experian.it (Consumers Area - SIC Information).

You have the right to access to Your data at any time exploitable writing to MBPS LEASING S.p.A. at privacy@mbpsleasing.it or to the credit information manager mentioned above.

It is Your right as well to request integration, update, correction or the erasure of data processed against the law, oppose to their processing for legitimate reason or lodge complaints (artt. from 15 to 22 GDPR; art. 8 Code of conduct).

Data retention period in credit information systems:

financing requests	180 days from request, if required by inquiry, or 90 days in case of request refusal or waiver.
late payment of 2 instalments or 2 months then settled	12 months from regularisation, without further negative events.
further late payment settled also through agreement	24 months from regularisation without further negative events.
pending negative events (late payment, serious breach, nonperforming exposure) not settled	36 months from contractual maturity or from the last update (in case of successive agreement or other events related to reimbursement). The maximum term for the retention of data related to the non-fulfilment not adjusted can never get over 60 months from the contractual maturity.
good relationships (no late payment or negative events)	60 months from termination or maturity of the contract, or from the first update performed in the month after those dates. Data can be further stored in case of relationships with negative events not settled.