

PRIVACY DISCLOSURE

1. Background

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, the "Regulation"), Banca Ifis S.p.A. (the "Bank" or the "Controller"), in its capacity as Data Controller, wishes to inform whistleblowers, within the meaning of the whistleblowing legislation, that the personal data relating to them (hereinafter, the "Data"), acquired in connection with reports of unlawful conduct, will be processed lawfully, fairly and transparently, in the manner and for the purposes set out below.

2. Source of personal data

The Data subject to processing by the Controller is acquired when unlawful conduct is reported, directly by the Bank through the channels set up by it.

3. Purpose and legal basis of the processing

The Data is processed in the context of the management of the report, for the following purposes:

- A. fulfilment of legal obligations, both national and European, and in particular the regulations governing the administrative liability of legal entities (Legislative Decree no. 231/2001);
- B. countering any unlawful conduct and in particular conduct in breach of rules that harm or may harm the public interest or the integrity of Banca Ifis Group companies.

With regard to purpose (A), the legal basis for the processing is the fulfilment of legal obligations to which the Controller is subject.

With regard to purpose (B), the legal basis of the processing is the legitimate interest of the Controller in pursuing the described purpose.

4. Categories of personal data

The Personal Data processed for the purposes indicated in paragraph 3 belongs to the following categories:

- identification and contact data (e.g. first name, surname, e-mail address, telephone number);
- data on the employment and/or collaboration contract (employer, type of contract);
- other Data voluntarily provided by the Data Subject in the report.

5. Personal data processing methods

Data processing is carried out in accordance with the principles set out in Article 5 of the Regulation, namely lawfulness, correctness and transparency, data minimisation, accuracy, storage limitation, integrity and confidentiality, by means of manual, computerised and telematic tools.

The processing is carried out in compliance with the precautions and guarantees prescribed by reference legislation, through security measures and mechanisms aimed at ensuring the confidentiality, integrity and availability of the Data, as well as at avoiding material or immaterial damage (e.g. loss of control of the Data or limitation of rights, retaliation, mobbing and other forms of discrimination, identity theft or usurpation, financial losses, unauthorised deciphering of the pseudonymisation, damage to reputation, loss of confidentiality of Data protected by professional secrecy or any other significant economic or social damage).

The Controller does not carry out any automated decision-making processes, including profiling, which produce legal effects concerning the Data Subject or which significantly affect him/her.

6. Transfer of data to non-EU countries/organisations

Where necessary in pursuance of the purposes set out in paragraph 3, the Data Subject's Data may be transferred abroad, to countries/organisations outside the EU that guarantee a level of protection of personal data deemed adequate by the European Commission in its decision, or on the basis of other appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission.

A copy of any Data transferred abroad, as well as the list of non-EU countries/organisations to which the Data have been transferred, may be requested from the Controller using the contact details set out in paragraphs 9 and 10 below.

7. Categories of persons to whom personal data may be communicated or who may become aware of them

For the pursuit of the purposes described in paragraph 3, the Data Controller reserves the right to communicate the Data to recipients belonging to the following categories:

- parties providing services for the management of the Bank's information system and telecommunications networks;
- Authorities and Legal Authorities, in any case only to the extent that the prerequisites laid down in the applicable legislation are met;
- professional firms or companies in the context of assistance and consultancy relationships (e.g. accountancy firms, law firms, etc.).

The persons belonging to the above categories operate independently as separate Data Controllers, or as Processors appointed for this purpose by the Bank, whose list, constantly updated, is published on the website www.bancaifis.it/privacy/.

The Data may also be known, in connection with the performance of assigned tasks, by the Controller's staff specifically authorised by the Bank to process the Data, in any case limited to the persons belonging to the function entrusted with handling the reports.

8. Storing and deleting personal data

As provided for under Art. 5 para. 1, letter e) of the Regulation, the Data shall be kept in a form which permits identification of the Data Subject for no longer than is necessary to achieve the purposes for which they were collected and processed, in accordance with the principle of proportionality and necessity and in any case no more than five years from the date of communication of the final outcome of the reporting procedure. When determining the storage period, the laws applicable to the activities and sectors in which the Data Controller operates (e.g. anti-money laundering regulations and regulations governing the keeping of accounting records), as well as the general and special provisions of the Data Protection Authority (e.g. in relation to retention periods for purposes of tracing transactions on customers' banking data) are also taken into account. After the expiry of the period thus established, the Data shall be deleted or made anonymous,

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Capogruppo del Gruppo Banca Ifis,
Iscritta all'albo dei Gruppi Bancari.
Società aderente al Fondo Nazionale
di Garanzia e al Fondo Interbancario
di Tutela dei Depositi.

unless further storage is necessary to comply with legal obligations or orders issued by Public Authorities and/or Supervisory Bodies or to exercise or defend a right in court.

9. Rights of the Data Subject

Pursuant to Articles 15 to 22, the Regulation gives Data Subjects the possibility to exercise specific rights. In particular, the Data Subject may obtain a) confirmation of the existence of processing of personal data concerning him/her and, if so, access to such data; b) the rectification of inaccurate personal data and the integration of incomplete personal data; c) the deletion of personal data concerning him/her, in cases where this is allowed by the Regulation; d) the restriction of processing, in the cases provided for by the Regulation e) communication, to the recipients to whom the personal data have been transmitted, of the requests for rectification/deletion of personal data and restriction of processing received from the Data Subject, unless this proves impossible or involves a disproportionate effort; f) receipt, in a structured, commonly used and machine-readable format, of the personal data provided to the Data Controller, as well as transmission of the same to another data controller, at any time, also upon termination of the relationship with the Data Controller. The Data Subject also has the right to object to the processing of Data at any time.

Requests may be submitted to the organisational unit responsible for responding to the Data Subject, by ordinary mail sent to the Controller's head office or by e-mail sent to privacy@bancaifis.it.

The Data Subject also has the right to lodge a complaint with the Data Protection Authority, as provided for in Article 77 of the Regulation, as well as to take legal action in accordance with Articles 78 and 79 of the Regulation.

10. Data Controller and Data Protection Officer

The Data Controller is Banca Ifis, S.p.A., with registered office in Venice-Mestre, Via Terraglio n. 63. The Controller has appointed a Data Protection Officer, who can be reached at the e-mail address: rpd@bancaifis.it.

11. Changes, updates to the Privacy Disclosure and referrals

Also in view of future changes that may be made to applicable privacy legislation, the Controller reserves the right to supplement and/or update all or part of this Disclosure. It is understood that any amendments, supplements or updates will be disclosed to the Data Subject in accordance with the legislation in force, also by means of publication on the Bank's corporate portal.