



PERSONAL DATA PROTECTION NOTICE

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1. YOUR PRIVACY



Assessing your application at Fideuram – Intesa Sanpaolo Private Banking S.p.A. requires processing your personal data.

We recognise the value that is to be placed on personal data and are committed to its safekeeping and confidentiality, ensuring that data processing is carried out in accordance with the principles of lawfulness, fairness, transparency, adequacy and relevance as required by the GDPR, **General Data Protection Regulation - (EU) Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016**.

In this information document, we explain the categories of your personal data we process and for what purposes, how we process the data, who we share it with and how long we keep it. We will then review each of your rights under the GDPR and provide you with the information you need to be able to exercise them.

2. WHAT IS DATA PROCESSING? WHO IS THE DATA CONTROLLER? HOW DO WE PROCESS YOUR DATA?



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”.

Since the Company determines the means and purposes of each of these “operations” involving your personal data, it assumes the role of “**Data Controller**” as defined by the GDPR, guaranteeing your confidentiality and fully protecting your rights.

We process your personal data using computer, telematic and manual tools – including artificial intelligence systems, as defined by current regulations — based on logic strictly related to the purposes indicated in this notice and in any case in compliance with the technical and organisational measures required by law, in order to guarantee a level of security appropriate to the risk. In some cases, we may also process your data through profiling techniques, in compliance with the principles of the GDPR. We do not use fully automated decision-making or monitoring systems designed to provide information relevant to the assessment of your application.

3. WHAT PERSONAL DATA DO WE PROCESS?

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

- ✓ **identity and personal data**, such as first name and surname, tax code, date and place of birth, address of residence/domicile, correspondence address, gender, nationality;
- ✓ **contact details**, such as landline and/or mobile telephone number, personal email address;
- ✓ **image data**, such as the photograph on your *Curriculum Vitae*;
- ✓ **data on personal and family situation**, such as marital status and household composition;
- ✓ **data relating to your educational background**, work experience and training;





- ✓ **salary data** and financial data, such as income from work experience and the possible existence of insolvencies with financial intermediaries;
- ✓ **data belonging to "special" categories**, e.g. data relating to health status. This data used to be referred to as "sensitive" and requires "special" protection. Data belonging to these categories may be processed exclusively for the purpose of assessing the application within the framework of targeted employment;
- ✓ **data contained in your Curriculum Vitae** and not included in the categories mentioned in the previous points.

Please note that, where applicable, personal data relating to your family members and cohabitants may also be processed, such as, for example, their name and surname, degree of relationship or affinity and their occupation. In such cases, you must inform those concerned.

4. WHOM DO WE COLLECT YOUR DATA FROM?



The data we process may be obtained:

Directly: we have collected them from you on the occasion of the application;

Indirectly: we have collected them from third parties (e.g. educational institutions and/or universities, Head Hunters) or from publicly accessible sources (e.g. professional registers, web services related to the labour market, external databases), in compliance with the conditions of lawfulness and, in any case, in compliance with the relevant regulations.

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

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.

The data we process is strictly related and instrumental to the evaluation of your application. Therefore, if you do not provide such data, the Controller cannot examine your application.

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

THE LEGAL BASIS	OUR OBJECTIVES
<p>a) <i>Pre-contractual measures</i> (Art. 6.1(b) of the GDPR)</p> <p>-----</p> <p>In this context, personal data relating to members of your family and your partner may also be processed, where applicable.</p>	<p><u>We need to collect and process</u> your personal data (e.g. personal details, educational degrees, foreign language proficiency, previous professional experience, etc.) to examine your application in order to assess its consistency with the employment opportunities offered by the Company and to be able to effectively include you in the selection process for the job positions sought. This path could include participation in interviews and tests, both in the presence and online.</p>
<p>b) <i>Legal obligation</i> (Art. 6.1(c) of the GDPR)</p> <p>(Art. 9.2(b) of the GDPR)</p> <p>-----</p>	<p><u>We comply with requirements issued by Public Authorities</u>, such as Banca d'Italia, the Personal Data Protection Agency, Consob (National Commission for Companies and the Stock Exchange) and other supervisory and control bodies/authorities, or issued by Authorities in implementation of a legal obligation.</p> <p>With regard to special data, we process your data, and the one of your family members and cohabitants, in order to fulfil the obligations and exercise the specific rights of the Company or</p>





In this context, personal data relating to members of your family and your partner may also be processed, where applicable.

of the data subject in the field of labour law, social security and social protection, insofar as the processing is authorised by the law of the European Union or of the Member States, subject to appropriate safeguards for the interests and fundamental rights of the data subject.

6. WHO COULD RECEIVE THE DATA YOU PROVIDED?

As a rule, your data will not be disclosed. We may provide your data to other entities, both inside and outside the European Union, solely **for the specific purposes set out in this notice, in accordance with the legal bases provided for in the GDPR.**

The recipients of your data may be:

- ✓ parties and companies, which carry out, by way of example and without limitation, the following activities:
- ✓ provision and management of IT and telecommunications procedures and systems;
- ✓ application assessment and personnel selection activities;
- ✓ computer security monitoring;
- ✓ professional advice;
- ✓ data management and archiving of documents (both paper and electronic).
- ✓ with your consent, companies and entities **belonging to the Intesa Sanpaolo Group**, whether subsidiaries or associates, which are potentially interested in your application.



The list of third parties and companies outside the Intesa Sanpaolo Group that are recipients of your data is constantly updated and can be required by sending an email to privacy@intesasanpaolo.com.



The entities referred to in the previous points process your personal data, depending on the specific activities, in their capacity as Data Controller, Data Processor or also as Independent Data Controller or Co-Controller.

Your personal data is also known to employees and other collaborators, including occasional ones, who, in connection with their specific duties, have been authorised to process the Bank's personal data.

7. HOW DO WE PROTECT YOUR DATA WHEN IT IS 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.





8. 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 it was collected.

Your personal data is normally kept for a maximum period of 3 years from the date of your first application. At the end of the storage period, your data will be deleted, except as set out below.

We will process your data for a longer period if further retention is necessary to comply with specific obligations defined by laws and regulations, so as to allow us to exercise or defend a right in court, as well as to comply with specific requests from Italian and/or foreign authorities, provided that these circumstances occurred before the expiry of the storage periods described above.

During the three-year data retention period, you may:

- ✓ request the complete removal of your "Candidate Profile", thus triggering its deletion before the expiry of 3 years;
- ✓ change/update the personal data and/or consent in your "Candidate Profile" or make/change an Application: in these cases, the three-year retention period shall run again from the date of the change/confirmation made by you.






9. 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

10. WHAT ARE YOUR RIGHTS?

The GDPR grants you the following rights:

 <p>Opposition (ex Art. 21 of the GDPR): the GDPR allows you to object to the processing of your personal data if the conditions set out in the regulation are fulfilled. 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.</p>	 <p>Access (ex Art. 15 of the GDPR): you have the right to obtain confirmation as to whether or not personal data concerning you is being processed and to obtain information about the processing being carried out, subject to the limitations provided by law.</p>
 <p>Rectification (ex Art. 16 of the GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you, and the integration of incomplete data.</p>	 <p>Deletion (ex Art. 17 of the 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 data is no longer necessary for the purposes for which it was processed and there is no other legal basis for the processing).</p>
	 <p>Limitation (ex Art. 18 of the 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</p>



	<p>to carry out appropriate checks on personal data whose accuracy you have contested).</p> <hr/> <p> Portability (ex Art. 20 of the 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 automatic machine-readable format. The GDPR also protects your right to transfer this data to another data controller without hindrance on our part.</p> <hr/> <p> Complaint (ex Art. 77 of the GDPR): if you consider that your data is being processed 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.</p>
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11. HOW CAN YOU CONTACT US AND EXERCISE YOUR RIGHTS

These are the details for contacting us and sending your requests to exercise your rights:

- Data Controller: Fideuram – Intesa Sanpaolo Private Banking S.p.A.
- Registered Office: Piazza San Carlo, 156 – 10121 Torino
- dpo@intesasnpaolo.com
- privacy@pec.intesasnpaolo.com



This Notice may be subject to legislative or regulatory updates. Therefore, please visit this page periodically.