

**INFORMATION NOTICE AND CONSENT TO THE PROCESSING OF PERSONAL DATA of
INDIVIDUALS CUSTOMERS, OCCASIONAL, MEMBERS and SHAREHOLDERS ⁽¹⁾
UNDER THE TERMS OF LEGISLATIVE DECREE 196/2003 "PERSONAL DATA PROTECTION CODE"**

The Bank, as **Data Controller** responsible for processing your personal data, informs you of the aims and methods of the use thereof and of the rights accorded to you by law, so that you may knowingly grant your consent to the processing thereof.

Your personal data, provided by yourselves, by third parties (for example by a bank transfer to your account or through other banks) or sourced from public listings (for example telephone directories, chamber of commerce and land registry registers), is processed for the following **purposes**:

1 - **the law**: that is, for the fulfilment of obligations laid down by law, by regulations or by Community legislation, (for example: anti-money laundering records, reporting to Bank of Italy), as well as rules issued by authorities appointed for such purposes by the law and by supervisory and monitoring bodies, for which your consent is not necessary;

2 - **marketing purposes and profiling**: that is, to provide you with information on products, services or initiatives of the Bank or of BPER Banca S.p.A. Banking Group - also in consideration of the centralisation of the Banking Group's activities within the Parent Company, as well as due to the "circularity" features of operations -, for the promotion thereof, to carry out market research, to verify the quality of products and services offered to you, also through the use of automated communication systems (2) and to identify preferences, tastes, habits, needs and consumer choices, in order to improve the products and services provided and to satisfy your needs. In this case, the provision of data and your consent are optional and the refusal to do so does not affect the ongoing relationship with the Bank.

3 - **handling of customer relationships and/or the handling of the associative relationship**: that is, to fulfil obligations deriving from contracts that you are party to and/or for purposes strictly related and instrumental to the handling of the associative relationship (in the event you are members of the Bank), as well as to meet, prior to the conclusion of the contract or of the associative relationship, which you are party to, your specific requests, or for reasons strictly related and instrumental to the processing of a transaction requested by you. In all these cases, the provision of data is not obligatory, but the refusal to provide the data may - in relation to the link between the data and the service requested - make it impossible for the Bank to provide the service in question. Accordingly, the processing thereof does not require your consent.

The Bank processes your "**sensitive data**" (3) to the extent that is strictly necessary for the performance of specific tasks requested by you or to handle your relationships **solely** with your consent and with the approval of the Guarantor for personal data protection. Accordingly, it is hereby confirmed that without your consent the Bank may not execute those transactions and handle relationships that imply the knowledge of such sensitive data (for example, bank transfers made to political parties, trade unions, religious or cultural movements, or insurance companies).

4 - **(solely for members) public information purposes**: that is, to render it possible to carry out activities connected or instrumental to the management of corporate functions, for which it may happen that, during a general meeting of members and on any other occasion where there is participation in public events involving members, you are likely to be captured by a video camera or be photographed and the images may be published in the Bank's internal magazines (for example, the PerVoi periodical) or externally (e.g. daily newspapers), but always in a context that does not compromise your dignity in any way. In all these cases, your consent is not requested.

The processing of your data takes place with recourse to both manual and automated tools; in a **manner** that is strictly for the above purposes and, in any case, in such a manner as to guarantee the security, protection and confidentiality of the data.

Within the Bank those who may gain **knowledge** of your personal data are those tasked with or responsible for the processing thereof, the employees thereof and its external collaborators, who perform, on its behalf, advisory and support services, mainly in connection with legal, IT, and auditing services.

Note also that, in accordance with the provisions of art. 52 bis and 52 ter, of Legislative Decree 385/93 (Consolidated Banking Act) and art. 8 bis and 8 ter of Legislative Decree 58/98 (Consolidated Finance Act), the Bank has adopted a system that allows members of staff to report internally any acts or facts that may constitute a breach of the rules governing banking and/or financial activities (aka "whistleblowing"). In this regard, your personal data may be processed for purposes linked to the verification of reports received by the Head of the whistleblowing system as the Head of data processing, as well as by authorised personnel, in compliance with current laws.

For the pursuit of the above aims, as well as, more generally, for the purposes of activities linked to the Bank's operations; for the purpose of credit risk mitigation and/or for compliance with guidance issued by the supervisory authorities or regulatory authorities (Bank of Italy, CONSOB, Antitrust Authority, Privacy Guarantor etc.) or to address measures recommended by the latter, the Bank needs to **communicate** your personal data to external parties, even abroad, pertaining to certain categories (4).

The parties pertaining to the above categories take on the role of "Data Controllers", except where they are expressly designated as "Data supervisors". A constantly updated listing thereof is available at the Bank's branches and is published on the website www.bper.it

Furthermore, the Bank may communicate to other financial intermediaries pertaining to BPER Banca S.p.A. Banking Group information relating to transactions initiated by you, considered to be "suspect" in accordance with anti-money laundering legislation (Art. 41, paragraph 1, Legislative Decree 21/11/2007 No. 231) without the need to obtain your consent (Privacy Guarantor Guideline 10/09/09).

Pursuant to articles 30-ter, paragraph 7-bis and 30-quinquies of Legislative Decree 141 of 13 August 2010, your personal data contained in identity and recognition documents, however named or equivalent, even if lost or stolen, in VAT numbers, in tax codes, in the documents that prove income as well as in social security and welfare positions, are communicated to the Archive at the Ministry of Economy and Finance, which is the basis of the public system for the prevention, at an administrative level, of fraud in the field of consumer credit and deferred or delayed payments, with specific reference to identity theft, for comparison with data held by public and private organisations in order to verify their authenticity. The Bank and the Ministry of Economy and Finance - which owns the Archive - will process the data as the independent processing titleholders, each to the extent of their own sphere of competence. The Archive is managed by CONSAP, as the Head of Processing, appointed by the Ministry of Economy and Finance. The data will be processed exclusively for the purposes of prevention of identity theft, including by electronic means, only by authorised staff in order to guarantee the obligations of security and confidentiality. The outcome of the procedure for checking the authenticity of the data will not be disclosed, but may be communicated to the Supervisory and Control Authorities and Bodies.

The Bank **does not circulate**(5) your personal data.

Pursuant to **article 7** of Legislative Decree 196/2003 you have the right to obtain confirmation of the existence or not of personal data concerning you, as well as the communication thereof. In particular, you have the right to know: the origin of the data, the purpose and means of the processing thereof, parties or party categories to whom the data may be communicated, as well as to obtain an update, amendment or, if it may be of interest to you, the integration or cancellation or blockage in the event the processing infringes the law.

Furthermore, you may, for legitimate reasons, object to the processing of the data; an objection is always possible and is free, in cases relating to advertising, marketing communications or market research.

The rights granted by article 7 may be exercised by making a request without any formality, even by means of proxy, to the Data Controller. A written request may be made by means of a letter, registered mail, telefax or e-mail addressed as follows:

- BPER Banca S.p.A. - Direzione Generale - Via S. Carlo 8/20 - 41121 Modena
- fax No. 059 220.537
- e-mail presidio.privacy@bper.it

Having read the above information notice, the undersigned:

Surname / First name (s)

NDG

Branch Code

(1) **GIVES CONSENT**

WITHHOLDS CONSENT

for the Bank to process his/her personal data for **marketing purposes** in relation to products and services offered by **BPER Banca S.p.A. and/or BPER Banca S.p.A. Banking Group**, and to communicate the data to parties pertaining to the categories indicated below and to companies hired to measure the quality of services and market research for related processing and authorises the use of regular mail, of the telephone - also through the use of automated calling systems without the intervention of an operator -, of e-mail, fax, text or mms messages.

(2) **GIVES CONSENT**

WITHHOLDS CONSENT

for the Bank to process his/her personal data for **marketing purposes** in relation to products and services offered by **third parties NOT belonging to BPER Banca S.p.A. Banking Group**, and to communicate the data to parties pertaining to the categories indicated below and to companies hired to measure the quality of services and market research for related processing and authorises the use of regular mail, of the telephone - also through the use of automated calling systems without the intervention of an operator -, of e-mail, fax, text or mms messages.

(3) **GIVES CONSENT**

WITHHOLDS CONSENT

for the Bank to perform **customer profiling** activities, consisting of the identification of preferences, tastes, habits, needs and consumer choices, in order to improve the products and services provided by **BPER Banca S.p.A. and/or BPER Banca S.p.A. Banking Group** to satisfy your needs, as well as to send, subject to your specific consent as per point (1), customised communications of a promotional, advertising or marketing nature, using the means indicated in point (1).

(4) **GIVES CONSENT**

WITHHOLDS CONSENT

for the Bank to process his/her **sensitive data** and to communicate the data to parties pertaining to the categories indicated below for related processing, being aware that, only after having received such consent in writing, the Bank may execute those transactions that require such processing or communication.

DATE AND LEGIBLE SIGNATURE

NOTES

(1)

When they are already customers of BPER Banca S.p.A. or of other BPER Banca S.p.A. Banking Group banks.

(2)

E.g.: e-mail, text messages, fax, mms.

(3)

Sensitive data is intended to mean personal data from which it is possible to reveal race or ethnic origin, religious, philosophical or other convictions, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical or union nature, as well as personal data from which it is possible to reveal one's health and sex life.

(4)

- Parent Company, BPER Banca S.p.A. Group Companies, or, in any case, subsidiaries or associates;
- parties which provide banking, financial and insurance services, inclusive of parties which intervene in the management of payment systems, credit card issuers, tax collection and treasuries;
- parties for which the bank offers products and services;
- parties which provide services for the management of the Bank's information systems and its telecommunications networks (inclusive of e-mail);
- service companies for the acquisition, the recording and the processing of data taken from documents, or support provided by and originating from customers themselves and for the purpose of mass processing of payments, trade notes, cheques and such like;
- parties which perform the preparation and transmission of communications to/from - customers (for example, envelope filling, mail management);
- parties which perform the filing of documents;
- parties which provide customer assistance (for example, by telephone);
- parties which intervene in the management of payment services and telecommunications networks, tax collection and treasuries;
- parties which manage national and international systems for fraud control;
- parties which perform loan recovery activities;
- consultants;
- parties which perform marketing activities or market research or which promote the bank's or third parties' products;
- parties which identify financial risks, with the aim of the prevention of insolvency risk (the databases of these parties may be accessed for the same purpose by subscribers to the parties in question) and, in particular: Bank of Italy; SIA (Società Interbancaria per l'Automazione - CEDBORSA S.p.A., via Taramelli, 26 - Milan); CRIF s.p.a., via Lama, 15 - Bologna, CERVED GROUP SpA, located in via San Vigilio, 1 - Milan, EXPERIAN CERVED INFORMATION SERVICES SPA, located in via Pesenti 121/123, Rome;
- parties which perform verification of and audit work on the activities carried out by the Bank, also in the interest of customers.

(5)

Circulation is intended to mean the provision of personal data to unspecified parties, in any form, even by means of making the data available or through consultation.

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(2) **GIVES CONSENT**

WITHHOLDS CONSENT

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(4)

- Parent Company, BPER Banca S.p.A. Group Companies, or, in any case, subsidiaries or associates;
- parties which provide banking, financial and insurance services, inclusive of parties which intervene in the management of payment systems, credit card issuers, tax collection and treasuries;
- parties for which the bank offers products and services;
- parties which provide services for the management of the Bank's information systems and its telecommunications networks (inclusive of e-mail);
- service companies for the acquisition, the recording and the processing of data taken from documents, or support provided by and originating from customers themselves and for the purpose of mass processing of payments, trade notes, cheques and such like;
- parties which perform the preparation and transmission of communications to/from customers (for example, envelope filling, mail management);
- parties which perform the filing of documents;
- parties which provide customer assistance (for example, by telephone);
- parties which intervene in the management of payment services and telecommunications networks, tax collection and treasuries;
- parties which manage national and international systems for fraud control;
- parties which perform loan recovery activities;
- consultants;
- parties which perform marketing activities or market research or which promote the bank's or third parties' products;
- parties which identify financial risks, with the aim of the prevention of insolvency risk (the databases of these parties may be accessed for the same purpose by subscribers to the parties in question) and, in particular: Bank of Italy; SIA (Società Interbancaria per l'Automazione - CEDBORSA S.p.A., via Taramelli, 26 - Milan); CRIF s.p.a., via Lama, 15 - Bologna, CERVED GROUP SpA, located in via San Vigilio, 1 - Milan, EXPERIAN CERVED INFORMATION SERVICES SPA, located in via Pesenti 121/123, Rome;
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