

INFORMATION NOTICE – CUSTOMER

INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA

(pursuant to art. 13 of General Data Protection Regulation (EU) 2016/679)

Pursuant to art. 13 of Regulation (EU) 2016/679 (General Regulation for the Protection of Data, hereinafter the “Regulation”), the Client is informed that his personal data are processed by BFF Bank S.p.A. in its capacity as Data Controller, in compliance with the provisions contained in the Regulation, according to principles of lawfulness and correctness and only for the pursuit of the for the following purposes: customer management, compliance with legal, accounting and tax obligations, business planning, litigation management, internal control services, also through electronic processing, consultation, comparison with pre-established criteria and any other appropriate operation relating to the achievement of these purposes.

For the aforementioned purposes, the legal basis of the processing consists in the execution of the contract of which the data subject is a member (Article 6, paragraph 1, letter b) of the Regulation) or the fulfillment of legal obligations (Article 6, paragraph 1, letter c) of the Regulation).

Depending on the channel used by the Client to maintain relations with BFF Bank S.p.A., the methods of treatment may also be by telephone, telematic or postal. The processing is carried out by personnel appointed in writing and the achievement of the purposes in question may also take place by means of transmission and communication of data to third parties, meaning such third parties authorized by the Data Controller to process the same data, as they are responsible for carrying out or providing specific services strictly functional to the execution of the contractual relationship, such as computer service companies, outsourcing companies, consultants and freelancers, all in compliance with the provisions of the law on data security. Personal Data may also be communicated to banks and credit institutions for the management of payments and, in relation to benefits, insurance, also may be disclosed to the requesting Supervisory and Judicial Police Authorities for the purposes of preventing and combating tax evasion and avoidance. A list of the names of all the persons belonging to the above categories is available at the Company's head office.

The data collected will also be disclosed to the Bank of Italy to enable it to carry out its institutional functions, such as:

- the supervision of the banking and financial system
- the protection of financial stability
- the implementation, within the Eurosystem, of the single monetary policy;
- economic and financial research and the production of statistics; the prevention and countering of the use of the economic and financial system for money laundering and credit financing purposes.

In accordance with Article 6(1)(c) of the Regulations, the communication of data to the Bank of Italy is a legal obligation. For the pursuit of the purposes related to the obligations of communication to the Bank of Italy, BFF Bank S.p.A. may proceed to the transfer of data between entities of the BFF Banking Group.

The Data Controller undertakes to adopt specific security measures to prevent the destruction or loss of data, unauthorised access or unlawful use, and in any case the necessary security measures, whether physical or IT, are adopted in line with the provisions of the Regulation. The Data Controller also undertakes to require third parties with whom the data is shared to adopt similar data processing and protection procedures in line with the provisions of the Regulation. The Data shall not be disseminated or transferred abroad. The aforesaid data can be collected both from the interested party and from third parties. The provision of the requested data, whether acquired on the basis of a legal obligation or as strictly functional to the execution of the contractual relationship, is necessary and any refusal to provide it involves the impossibility of carrying out the activities required for the conclusion and execution of the contract.

Personal Data will be stored in a complete manner for the entire period of the execution of the contract; subsequently, Personal Data will be stored for a period of ten years in order to comply with legal obligations and, among these, the obligations referred to in article 2220 of the Civil Code. Any further storage of Personal Data or part of Personal Data may be arranged to enforce or defend their rights in any possible location and, in particular, in judicial venues.

With regard to your personal data we inform you that you can exercise your rights set out in the articles from 15 to 22 of Regulation (EU) 2016/679:

1. Access to the following information:
 - purposes of the processing,
 - categories of Personal Data concerned,
 - recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations,
 - existence of the Data Subject right to ask the controller to rectify or erase Personal Data or restrict the processing of Personal Data concerning him or her or object to such processing,
2. Rectification, by this meaning:
 - rectification of inaccurate Personal Data concerning him or her without justified delay,
 - supplement of incomplete Personal Data, including by means of providing a supplementary statement;
3. Erasure of Personal Data concerning him or her without undue delay, if:
 - Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - the Data Subject withdraws consent and there is no other legal ground for the processing,
 - You object to the processing and there are no overriding legitimate grounds for the processing,
 - the Personal Data have been unlawfully processed,
 - the Personal Data have to be erased for compliance with a legal obligation,

- the Personal Data have been collected in relation to the offer of information society services;
4. Restriction of processing:
 - if the accuracy of the Personal Data is contested, for a period enabling the controller to verify the accuracy of such Personal Data,
 - when the processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead,
 - when the Personal Data are required by the Data Subject for the establishment, exercise or defense of legal claims, although the controller no longer needs them for the purposes of the processing,
 - if you object to processing by virtue of the right of opposition;
 5. Receive notification in case of rectification or erasure of Personal Data or restriction of processing;
 6. Data portability, i.e. the right to receive the Personal Data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:
 - the processing is based on express consent of the Data Subject for one or more specific purposes or takes place due to a contract signed with the Data Subject and
 - the processing is carried out by automated means;
 7. Objection at any time, on grounds relating to his or her particular situation, to processing of Personal Data concerning him or her.
 8. Right not to be subjected to a decision based solely on automated processing, including profiling.
 9. Right to withdraw the consent - if given - at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the withdrawal.

You have the right to lodge a complaint with a supervisory authority if you believe that the rights listed herein have not been recognized to you.

To exercise the aforementioned rights, please contact the Controller by sending a registered letter to BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milano The Bank has appointed a data protection officer that you can contact at the following email address DPO@bff.com.

The Data Controller undertakes, without undue delay, if the conditions are met, to notify the persons concerned of data breaches in accordance with the provisions contained in the Regulation.

The Bank may make amendments and/or additions to this notice also as a consequence of any subsequent regulatory changes and/or additions.

The Controller: BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milano

The representative of the Controller: the CEO of the Bank with the delegation to represent the Bank in order to comply with the provisions set out in Regulation (EU) 2016/679.



The Bank has also appointed a Data Protection Officer. You can reach it at the following e-mail address: DPO@bff.com.