



## **Abstract of the Personal Data Protection Policy**

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## **1. INTRODUCTION**

Banca Generali regards the protection of Personal Data as a priority for safeguarding the fundamental rights and freedoms of its customers.

Accordingly, in compliance with the relevant European legislation, i.e., the General Data Protection Regulation (GDPR), the Bank has adopted a Personal Data Protection Policy aimed at highlighting the key principles and fundamental requirements in processing personal data.

## 2. KEY REQUIREMENTS

### 2.1. Lawful, fair and transparent processing of personal data

In accordance with the GDPR principles of lawfulness, fairness and transparency, Banca Generali undertakes to ensure that personal data are processed lawfully, fairly and in a transparent manner and collected for specified, explicit and legitimate purposes. Personal data processing also aims at respecting the principle of minimisation of processing, both in the operational management of said data and as part of its mere storage.

### 2.2. Consent and circulation of policy statement

The Company circulates a policy statement to Data Subjects regarding the processing to be carried out and requests their consent before processing begins through the Persons in Charge of the Processing, such as employees and Financial Advisors, or through the use of remote and/or online communications media.

Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the Data Subject's agreement and requested for each purpose of processing.

This policy statement provides the Data Subjects with information on the nature and use of the personal data processed, the legal bases for the processing (including the consent), the rights to which they are entitled (including the right to withdraw the consent given, the right of access to personal data, the right to data portability, the right to rectification, the right to erasure), the data retention period, the mechanisms for protecting such data, the criteria according to which personal data may be disclosed to third parties and the possibility of lodging a complaint with the Data Protection Authority.

### 2.3. Protection by design e by default

Banca Generali ensures compliance with Personal Data protection *by design e by default*.

- **Privacy by design:** the Bank identifies and implements appropriate technical and organisational measures designed to ensure compliance with the principles dictated by GDPR from the planning of processing, while determining the purposes and means (such as pseudonymisation or anonymisation of the data) in advance.

**Privacy by default:** appropriate technical and organisational measures must ensure by default that the personal data collected are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; the same principle applies with regard to the amount of Personal Data collected, the extent of Processing, the period of their storage and their accessibility. With reference to the latter point, Banca Generali has adopted processes aimed at limiting and controlling the parties authorised to access personal data, both general and sensitive, with a view to protecting it from unauthorised access.

- **The following elements are assessed in application of the above principles:**

- amount of the personal data to be collected;
- extent of the processing activities;
- the storage period;
- number of parties having access to the personal data.

## **2.4. Third parties**

Where a third party is entrusted with personal data processing activity, the Bank, where appropriate, appoints a Data Processor, who is selected on the basis of his ability to provide sufficient guarantees to implement appropriate technical and organisational measures to ensure compliance with GDPR requirements. The said third parties are assessed also taking account the presence of personal data protection policies in line with the standards adopted by Banca Generali. With regard to the possibility of forwarding personal data to third parties for their own commercial purposes, Banca Generali has defined an opt-in consent mechanism, allowing the Data Subjects to decide in advance whether to give the related consent. In accordance with the law, an opt-out mechanism is also provided for allowing the Data Subject to withdraw the said consent once it has been given. Annual sample audits are performed on third parties that manage personal data owned by Banca Generali.

## **2.5. Storage**

In the personal data storage phase, Banca Generali applies the principle dictated by privacy legislation of **storage limitation**: data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data storage complies with the principle of minimisation of processing.

## **2.6. Amendments to the Policy**

Where significant changes are made to personal data processing, data subjects are informed in a timely manner, so as to update them regarding the new approaches to processing their personal data. The Record of Processing Activities is also kept up to date for this purpose.

## **2.7. Personal data breaches**

In the event of a personal data breach, Banca Generali undertakes to notify the said breach to the supervisory authority competent in a timely manner, without undue delay and in accordance with the timescales established by law.

If the breach in question may entail a high risk for the rights and freedoms of the Data Subjects, the Bank shall also inform the Data Subjects of the breach.

For this purpose, the Bank has implemented a record of personal data breaches and establishes internal procedures that ensure it is kept up to date upon each violation.

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Among the various information, the record includes:

- the circumstances of the breach;
- the consequences of the breach;
- the measures adopted to contrast it and limit its effects;
- the involved personal data;
- the reasons for not carrying out the notification, or for carrying it out after 72 hours.

Security measures suited to preventing personal data breaches, adequate to identifying and combating breaches that have occurred, are also envisaged. Where necessary and applicable, as in the event of malicious personal data breaches, disciplinary measures may be imposed.

### **3. COMMITMENT AND IMPLEMENTATION OF STANDARDS**

#### **3.1. Person in Charge of the Processing and Contact Persons**

As part of its general commitment to implementing the main data protection legislation, the Bank establishes internal procedures for the appointment of the Persons in Charge of the Processing and Contact Persons, who are assigned specific duties for privacy purposes. Banca Generali has also established an organisational unit charged in particular with managing issues relating to personal data processing, in support of the Company's Data Protection Officer, who is responsible for overseeing the processing and protection of personal data.

#### **3.2. Training**

The Persons in Charge of the Processing and Contact Persons are also ensured adequate training through the organisation of specific courses and the provision of precise instructions regarding how processing should be performed. To this end, Banca Generali organises training events dedicated to the Persons in Charge of the Processing regarding personal data protection, applicable legislation in force and the privacy structure adopted.

#### **3.3. Documentation of activity**

The Bank maintains precise documentation regarding the activities performed to ensure that processing is carried out in accordance with applicable legislation.

#### **3.4. Updating and application**

Where necessary, Banca Generali revises its Personal Data Protection Policy, in order to ensure that it complies with the law and to adapt its personal data processing standards to industry best practices, and carries out internal audits on said policy. The Personal Data Protection Policy applies to all personal data processing operations, including those performed by suppliers, and is part of the overall system of internal regulations relating to compliance with applicable laws and regulations.

#### **3.5. Security**

Taking into account the state of the art, the nature, scope, context and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Banca Generali has implemented appropriate technical and organisational security measures to ensure a level of security appropriate to the risk. For its customers, Banca Generali periodically carries out awareness-raising campaigns against fraud, including for instance cyber-fraud.