

NOTICE GIVEN TO DATA SUBJECT FOR THE INSURANCE PROCESSING OF PERSONAL DATA

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 (“**GDPR**” or “**Regulation**”), and in general in compliance with the principle of transparency set out in the same Regulation, Verlingue S.p.A. (the “**Company**” or “**Broker**”) provides the following information concerning the processing of your personal data.

1. Purposes of data processing.

Personal data are processed in the normal course of the Broker's business according to the following purposes:

- a. pre-contractual, contractual, administrative and accounting purposes** (including complaint management and litigation) as well as for any other accounting, tax, administrative processing and in any case directed exclusively to the performance of the brokerage business with insurance and reinsurance companies carried out in your interest pursuant to the Italian Law 792/84, the Italian Legislative Decree 79/2005 no. 209 (Italian Insurance Code), the IVASS (Italian Insurance Supervisory Authority) Regulation no. 40 of 02/08/2018 and any subsequent amendments;
- b. purposes connected to obligations laid down in laws, regulations, and EU legislation** as well as in provisions issued by authorities empowered to do so and by supervisory and control bodies (anti-money laundering legislation, IVASS provisions, etc.);
- c. purposes functional to the development of the Broker's business** for which the data subject has the right to object:
 - transmission, via the e-mail details you have provided, of communications concerning products or services similar to those already provided (e-mail newsletters), provided that you, duly informed, do not refuse such use, either initially or on the occasion of subsequent communications;
 - transmission of technical information circulars of various kinds and those concerning risk prevention;
 - verify the level of client satisfaction with the Broker's products and services by sending an assessment questionnaire via e-mail on our services, the results of which will be processed in aggregate and anonymous way;
- d. transmission** by the Company or by group companies **of information or advertising material** regarding products or services of group companies or insurance companies or other companies.

2. Type of data processed.

The following categories of data may be processed: surname, first name, birthplace and date, residence; tax identification number and/or VAT number; phone number/e-mail address, details of identification documents; any data of a special nature concerning state of health, etc.

Verlingue S.p.A. will not process any personal data belonging to special categories, unless this is required for the provision of the service.

3. Legal basis of processing and provision of data.

We inform you that the personal data concerning you, potentially including health and/or genetic data, which will be collected from your communication or otherwise obtained (from public sources, websites or third parties, such as commercial and credit information companies, or service providers through databases, thematic or sector-specific lists), will be processed by Verlingue S.p.A. in order to provide you with the best possible services and/or insurance products requested or provided in your favour, or to fulfil, within the scope of contractual obligations, your requests as an injured third party (specifically to enable the administrative and accounting management of the contractual relationship, settlement of contractual benefits, settlement of claims or payments/refunds of other benefits), for management and control purposes within the Company, for statistical activities, to prevent and detect potential insurance frauds, and to initiate related investigations and legal actions, as well as to comply with legal obligations.

For the purposes of the aforementioned processing, the Data Controller may become aware of data that falls under special categories of personal data as defined in Article 9, paragraph 1 of the Regulation (data related to

health) and personal data related to criminal convictions and offenses under Article 10 of the Regulation, within the limits of the authorisations provided by law or regulation.

The processing of data related to criminal convictions and offenses (Article 10 of the GDPR) may be carried out within the limits established by current legislation, exclusively for purposes related to determining liability in relation to claims or other events relevant for insurance purposes, and for the prevention of fraud or other risks to the business.

The processing of personal data directly provided by you will be carried out by the Broker for the purpose of concluding the contract with you and/or in the context of its execution.

It is also possible that personal data of third parties provided by you to the Company may be processed. In this case, you act as the independent Data Controller and assume the corresponding legal obligations and responsibilities, indemnifying the Company against any disputes, claims, and/or requests for compensation for damage resulting from the processing that may be submitted to the Company by third parties involved.

Without prejudice to the personal autonomy of the data subject:

- with regard to purpose **a)**, there is no obligation to provide data in the pre-contractual phase, **but failure to do so will make it impossible to comply with the request to provide the service**. Once the contract has been stipulated, the provision of further necessary data, or the update of data already provided, is mandatory for all that is required by legal and contractual obligations and, therefore, **any refusal to provide such data in whole or in part may make it impossible for the Company to execute the contract and may in any case constitute a breach of contract or a violation of the law by the Client**. The legal basis for the processing of only personal data belonging to special categories is your explicit consent, bearing in mind that the provision of data is necessary for the stipulation of contracts, their amendment and any other relation with the Broker. **In the event of a refusal to provide the requested data, the client's requests cannot be fulfilled, or the continuation of any ongoing relations may be prevented or hindered;**
- with regard to purpose **b)**, you will be asked, if not available as collected for purpose a), for the data related to the fulfilment of these obligations by the Company, and **failure to provide such data may constitute a violation of law by you;**
- with regard to purposes **c)**, **these communication may be sent unless you, duly informed, do not refuse such use**, either initially or on the occasion of subsequent communications and the processing is carried out on the basis of the legitimate interest of the development and marketing holder;
- for purpose **d)**, the provision is optional and **processing will only take place with your consent as data subject**.

4. Processing methods.

Data will be mainly processed by manual, electronic, IT and telematic instruments with logic strictly related to purposes indicated above and will be stored both on IT and on paper records and on any other type of suitable record, in compliance with the minimum organisational and technological security measures appropriate to guarantee the confidentiality of the data and to avoid access to data by unauthorised third parties and in any case in line with the GDPR.

In any case, such processing will be carried out in compliance with the principle of lawfulness, transparency, necessity, proportionality and minimisation (Article 5 of GDPR), as well as with the obligations set forth by the Regulation, in particular with those related to security measures (Article 32).

5. Persons to whom personal data may be disclosed.

Personal data related to the processing at issue may be disclosed:

- a.** to other parties in the insurance industry such as, but not limited to: insurers, co-insurers and re-insurers, brokers, agents, subagents, producers, insurance brokers and other channels for acquiring insurance contracts (e.g. banks and security brokerage firms); to companies that acquire, record and process data contained in documents or records provided to the Broker by clients to carry out insurance texts and specifications, agreements, etc.; to companies providing insurance services as professionals in general: risk managers, asset appraisal companies, etc.; to lawyers, experts and garages; to service companies entrusted with the management, settlement and payment of claims; to service companies including those for IT to enable the performance of operations and/or services requested by the Client (e.g. data transfer services), for filing procedures, for printing correspondence, for managing incoming and outgoing mail; to association bodies (e.g. health funds, provident and relief funds, ANIA [Italian National Association of Insurance Companies], etc.) and consortium bodies specific to the insurance industry; to IVASS and to the Italian Ministry of Industry, Trade and Crafts, CONSAP (Italian Concessionaire for Public Insurance Services), UCI (Italian Central Office), the Italian Pension Fund Supervisory Commission, the Italian Ministry of Labour and

Social Security and other databases for which disclosure is mandatory (e.g. Ufficio Italiano Cambi [Italian Foreign Exchange Office], the Italian Central Accident Record, the Italian state authority for motor vehicles); to companies in charge of fraud control, debt collection and the detection of credit and insolvency risks; to Public Administrations, in accordance with the law; to companies in charge of quality certification; without the consent of the data subject to the communication of data to the aforementioned companies and related processing, the Company may only carry out operations and services that do not require the communication of personal data to third parties;

- b.** to group companies (parent companies, subsidiaries and affiliated companies, even indirectly, in accordance with the applicable legal provisions).

Personal data are not subject to disclosure.

6. Place of data processing.

The business takes place on the territory of the European Union. There is no intention to transfer the data outside the territory of the European Union or to an international organisation, except in the case of international programmes extended to non-European countries as well, activated on its instructions, for which the European Commission has decided on the adequacy of the protection of personal data and therefore this transfer does not require specific authorisation.

7. Rights of the data subject.

We remind you that the GDPR gives you the right to exercise the following rights:

- a) access to personal data** (therefore, you shall have the right to be provided, free of charge, with information on the personal data held by the Controller, as well as to obtain a copy thereof in an accessible format);
- b) rectification of data** (we will, upon your request, correct your data – not the expression of evaluative elements – that are incorrect or inaccurate, also become so as not updated);
- c) revocation of consent** (if the processing is carried out on the basis of consent given by you, you may at any time revoke your consent and such revocation of consent shall result in termination of processing);
- d) deletion of data or right to be forgotten** (i.e. the right to request the deletion of data when it is no longer necessary for the purposes, for example, in the event of revocation of consent, or if there is no other legal basis for processing);
- e) limitation of processing** (in certain cases – contestation of the accuracy of the data, during the time necessary for verification; contestation of the lawfulness of processing with objection to deletion; needs for use for your rights of defence, while they are no longer useful for processing purposes; if there is objection to processing, while the necessary verifications are carried out – data will be retained in such a way that they can be restored, if necessary, but, in the meantime, data cannot be consulted by the Controller except in connection with the validity of your limitation request);
- f) objection to processing for legitimate reasons** (in certain circumstances you may object to the processing of your data, and in any event, you may object to processing carried out for direct marketing purposes);
- g) data portability** (upon your request, data will be transmitted to the entity you indicate in a format that makes it easy to consult and use them);
- h) lodging a complaint** with the supervisory authority (if you believe that the processing of your data is in violation of current regulation, you may file a complaint **with Italian Data Protection Authority**).
- i) right to not be subjected to decisions based solely on automated processing** (including profiling) or to a decision-making process without human intervention, which legal produces effects concerning you or significantly affects your person.

8. Data Controller.

The Data Controller is the company **VERLINGUE S.p.A.** in the person of its Legal Representative *pro tempore*, Fabrizio Veneri. To exercise the rights envisaged above, the interested party must send a written request addressed to: VERLINGUE S.p.A. – Privacy Protection – Viale Adriano Olivetti, 36 – 38122 Trento (TN) – tel. +39 0461 405200 – fax +39 0461 823750 – e-mail trento@verlingue.it.

9. Contact details of the Data Protection Officer (DPO).

We inform you that VERLINGUE S.p.A. has appointed, pursuant to Article 37 of the GDPR, a Data Protection Officer (DPO) in the person of **lawyer Alberto Bronzin**, who can be contacted through the following channels: e-mail: dpo@verlingue.it, or postal address: lawyer Alberto Bronzin, via Moretto, 42 – 25121 Brescia.

VERLINGUE S.p.A.