



Notice on the processing of personal data

Dear Sir or Madam,

We are providing you with the privacy notice used by Factorit S.p.A., hereinafter the “Company”, as necessary for the protection of your personal data, in accordance with the provisions of the relevant legislation in force, and Regulation (EU) 2016/679 (GDPR) in particular.



Useful contacts

Factorit S.p.A. is the company that processes your data. For legal purposes, it is deemed the **Data Controller**. In this capacity, it is responsible for ensuring application of appropriate organisational and technical measures as necessary for the protection of your data. The Company’s registered office is at Via Cino del Duca 12 – 20122 Milan.

The Company uses specially designated **External Data Processors**, a list of which can be obtained from the Company. The Company also appointed a **Data Protection Officer (DPO)**, responsible for ensuring compliance with the legislation on the protection of your privacy, that can be contacted, for issues related to the processing of your data, at the following addresses: Via Cino del Duca 12 – 20122 Milan, dpo@factorit.it

For further information on your rights, see the section titled “Your rights”.



Information on the processing of your data

We inform you that the personal data collected will be processed in accordance with the legislation in force on the processing and the protection of data. Therefore, the Company undertakes to process them in accordance with the principles of fairness, lawfulness, transparency and respect for the purposes indicated below, and collect them to the precise extent necessary for the processing, only using authorised and trained personnel for such purposes, in order to ensure the necessary confidentiality of the information provided.

In particular, the Company may use your data in order to:

- 1) comply with legal provisions governing civil, criminal and tax matters, EU legislation, and rules, codes and procedures issued by the relevant authorities and institutions, including supervisory and oversight authorities;
- 2) allow the relationship to be correctly handled in legal, technical and financial terms, including in the pre-contractual stage, proper performance of the agreement and of all related activities, such as collection management, reporting, checks on the development of the relationship, credit recovery, internal audits, etc.);
- 3) enforce or defend a right, including in judicial, administrative or mediation procedures in the cases provided for by the law, the EU legislation, regulations, etc.

Processing your data is necessary for performance of the agreement (factoring and assigned debtor facilitation agreements, financial agreements in general) or in order to fulfil legal obligations; therefore, if you deny it, it will be impossible to establish the relationship.

Categories of personal data

The personal data that the Company processes include, without limitation, personal data, contact details, tax details, marital status, photos, ties to other parties, banking, financial and economic information, credit and judicial records, including of prospects or potential suppliers, as indicated by you, etc.

Sources of personal data

The Company uses your personal data that have been provided by or gathered from third parties (provided by Customers or obtained from credit reference, file search and inquiry agencies, reporting parties, banks, etc.), from public sources (e.g. Chambers of Commerce) or publicly available databases in compliance with the relevant legislation.

Specific cases of processing

The Company might process your personal data in the scope of a relationship or potential relationship with a Customer, in the event that you are: a representative/officer/attorney, guarantor, a debtor of which factoring is offered or an assigned debtor, a supplier, or the beneficiary of a payment.

Your data storage period

The Company will store your data for a period equal to the duration of the relationship and 10 additional years after its termination or the last transaction related to it, except when it is necessary to store it for a longer period due to any disputes, requests from competent authorities or pursuant to the applicable legislation.

Transfer of your data and access to your data

The company may disclose your personal data to the categories of parties indicated below:

- Companies belonging to the BPER Banca S.p.A. Banking Group, for performance of legal or contractual obligations;
- third parties, including those located in third countries, appointed to carry out activities that serve those of the Company (including credit institutions, professional offices, consultants, insurance companies, companies providing transactional and administrative, IT, technological, data processing, file search, inquiry, commercial information and credit recovery services, etc.) which carry out outsourced activities on behalf of the Data Controller, as Independent Data Controllers or External Data Processors;
- Judicial Authorities, Revenue Agency, Social Security Institutions, sectoral supervisory and oversight authorities (e.g. Bank of Italy, ECB) and, in general, parties to which disclosure is obligatory by law. The said parties shall process the data in their capacity as independent Data Controllers;
- third parties, such as the Central Electronic Archive, for which the Ministry of the Economy and Finance (*MEF*) is responsible, connected to databases of certain public bodies (e.g. Revenue Agency) in order to check its authenticity, within the framework for prevention of the risk of fraud and in particular theft of identity of natural persons requiring activation of financial services;
- third parties, including trade and professional associations, in the scope of the services provided by the Company, in relation to information acquired during the course of the relationships, in order to manage a system of commercial information and information on payment behaviour.

We also inform you that, if the relationship is activated within the scope of a convention, your accession thereto may be known by other acceding parties, including through websites dedicated to it.

The Company will not disseminate your personal data to undetermined parties.



Your rights

With regard to the processed data, the Company guarantees that you are able to:

- obtain confirmation of the existence or otherwise of your personal data and a copy of it in a readable format;
- obtain the updating, rectification or supplementation of your data;
- request erasure of your data, by the time limits provided for by the law, or request its anonymisation;
- object, entirely or in part, for legitimate interests, to the processing of your personal data;
- limit the processing in the event of a violation, request for rectification or objection;
- request the portability of electronically processed data, provided based on consent or a contract;
- withdraw your consent to the processing of your data, if given.

To this end, the Company has a specific section on its website (Privacy area) from which you can download the form; it can then be filled in and sent by email to the address dpo@factorit.it, for the attention of the DPO or by registered letter to the Company's registered office.

The Company undertakes to respond to your requests within one month, save for particularly complex cases, which could take up to three months. In any case, the Company shall provide you with an explanation of the reason for the delay within a month of your request. The outcome of your request will be provided in writing or in electronic format.

If you request rectification or erasure of your data or restriction of its processing, the Company undertakes to communicate the outcomes of your requests to each of the recipients of your data, except where this is impossible or would entail disproportionate effort.

Remember that withdrawal of consent will not affect the lawfulness of processing based on consent given before withdrawal.

The Company may reject your request if it is manifestly unfounded, excessive or repetitive. In this respect, the Company has a register to keep track of your requests.

Lastly, if you deem it to be appropriate, you may lodge a complaint with the Italian Data Protection Authority, according to the law. For further information, please visit the website www.garanteprivacy.it

To view subsequent updates of this notice, please see the website www.factorit.it