



**CREDITO EMILIANO SPA**

Capogruppo del Gruppo Bancario Credito Emiliano - Credem - Capitale versato euro 332.392.107 - Codice Fiscale e Registro Imprese di Reggio Emilia 01806740153 - P. IVA 02823390352 - REA n° 219769  
Iscritta all'Albo delle banche e all'Albo dei Gruppi Bancari tenuti dalla Banca d'Italia - Aderente al Fondo Interbancario di Tutela dei Depositi Sede Sociale e Direzione - Via Emilia S. Pietro, 4 - 42121 Reggio Emilia  
Tel: +39 0522 582111 - Fax: +39 0522 433969 - www.credem.it - info@credem.it - credem@pec.gruppocredem.it - Swift: BACRIT22 - Telex: BACDIR 530658.  
La Società ha adottato un Modello ai sensi del D. Lgs. 231/01 e specifici standard di comportamento per i quali si rimanda alla "Comunicazione standard etici" consultabile sul sito www.credem.it.

**Processing of personal data: information under Articles 13 and 14 of the EU Regulation 2016/679 (Personal Data Protection Regulation)**

With this document, the Controller, as defined below, wishes to inform you about the purpose and manner of the processing of your personal data and the rights that the Regulation (EU) 2016/679, relating to the protection of persons with regard to the processing of personal data, as well as the free movement of such data ("GDPR"), recognizes them. This Policy may be supplemented by the Controller if any additional services requested by you involve further data processing.

**1. Who are the Controller and the Data Protection Officer (DPO)**

The Controller is Credit Emiliano S.p.A. (the "Bank" or the "Controller"), based in Via Emilia San Pietro, 4, 42121, Reggio Emilia (RE).

The Controller has appointed a Data Protection Officer (DPO), whom you may contact for the exercise of your rights, as well as to receive any information related to them and/or this Policy:

- writing to Credit Emiliano S.p.A. via Emilia San Pietro, 4, 42121, Reggio Emilia (RE) – Att.ne Data Protection Officer;
- Sending an e-mail to [privacy@credem.it](mailto:privacy@credem.it);
- Sending a certified e-mail to PEC [credem@pec.gruppocredem.it](mailto:credem@pec.gruppocredem.it);
- Call 800 273336.

The Controller and the DPO, also through the designated structures, will take charge of your request and provide the information related to the action undertaken with regard to the request without unjustified delay and, at the latest, within a month after receiving it,

We inform you that if the Controller has any doubts about the identity of the individual submitting the request, it may request additional information to confirm the identity of the person concerned.

**2. Personal data we deal with**

**2.1. Personal data**

For the purposes set out in this Notice, the Controller may process common personal data, which is, for example, personal data (first name, last name, e-mail and other contact details, an online identifier).

In the absence of such personal data, the Bank will not be able to manage your "innovative idea".

**2.2 Source of personal data**

Your personal data processed by the Bank is those provided directly by you to the Controller.

**3. Purpose of data processing**

**3.1 Management of your requests and compliance with regulatory obligations**

The processing of your personal data is necessary to contact you again - also by remote communication tools (telephone, e-mail) - in the event that we want to elaborate on or give you information about the "innovative idea" you have proposed by filling this website section.

**4. Nature of the provision and consequences of a refusal to provide personal data**

The following table contains a summary of: (i) purpose of the processing; (ii) mandatory or optional nature of providing data; (iii) consequences of a refusal to provide data; (iv) legal basis of the processing, with particular indication of the cases in which your consent is necessary to be able to proceed with the process; (v) retention period of your personal data..

|     | <b>Purpose of the processing</b>   | <b>Nature of the data provisioning</b>       | <b>Consequences of a refusal to provide data</b>                                     | <b>Legal basis of the process</b> | <b>Retention period of your personal data</b>                                                                                                             |
|-----|------------------------------------|----------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.1 | <b>Management of your proposal</b> | Mandatory requirement to manage the proposal | Failure to provide data will make it impossible for the Bank to manage your proposal | Consent                           | Your personal data will be actively processed for the time necessary to manage your request and kept for a maximum period of 6 months from the conferment |

**5. How your personal data will be processed**

The processing of your personal data will be carried out, in accordance with the provisions of the GDPR, through paper, computer and telematics tools, with logic closely related to the purposes indicated and, in any case, in ways that are able to guarantee security, in accordance with Article 32 of GDPR.

**6. Subjects personal data may be disclosed to**

For the purposes described in paragraph 3, your personal data will be processed by employees, assimilated staff, Bank employees who will act as distributors and/or processors.

In addition, the Controller may need to communicate your personal data to third parties, whether or not they belong to Credem Group (also based outside the European Union, in accordance with the regulatory conditions that allow it) belonging, as an example, to the following categories:



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- a) other companies belonging to Credem Group or subsidiaries or related companies under Article 2359 c.c.; soggetti che supportano le attività di istruttoria e valutazione delle Sue proposte;
- b) other players whom the Bank uses in various ways to manage the received proposals;
- c) those who provide services for the management of the Bank's IT system;
- d) subjects who provide professional services of fiscal, legal and judicial advice and assistance;

The subjects belonging to the above categories operate, in some cases, as separate controllers of the processing, in other cases, as processors specially appointed by the Bank in accordance with GDPR article 28.

The full and updated list of Credem Group Companies and/or third parties to whom your personal data may be disclosed to is available on [www.credem.it](http://www.credem.it), in the Privacy section.

Your personal data will only be transferred outside the European Union to those named in this paragraph 5) and only if there is an adequacy decision by the European Commission or other appropriate guarantees provided by the GDPR (including binding corporate rules, and type of protection clauses).

#### **7. Rights you have as data subject**

In relation to processing described in this Notice, as a data subject you may, under the conditions provided by GDPR, exercise the rights enshrined in articles 15 to 21 of GDPR and, in particular, the right of access, rectification, erasure, restriction of processing, data portability, object. For more details regarding GDPR-recognized rights, please see the "Privacy" section on [www.credem.it](http://www.credem.it).

The above rights may be exercised by contacting the references mentioned in the previous paragraph 1.

The exercise of your rights is free under Article 12 GDPR. However, in case of manifestly unfounded or excessive claims, even for their repetitiveness, the Controller may charge you a reasonable expense contribution, in light of the administrative costs incurred to handle your request, or deny your satisfaction of his request.

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