

RAISIN

Data protection declarations of consent

For imprebanca to be able to provide services to the customer it is necessary that certain personal data are shared between imprebanca, Raisin, the distribution partner (if applicable), Raisin Bank or Keytrade Bank with which the customer wishes to conclude a contract or has concluded a contract. These personal data are, among other things, salutation, title, first name(s), surname, street / number, postal code / city, e-mail address, mobile phone number, deviating shipping address, nationality, date of birth, birthplace, country of birth, marital status, occupation, professional industry (if applicable), tax identification number and tax residency, IBAN and BIC of the reference account, documents provided by the customer, as well as information on the status and amount of the deposits or investments of the customer.

- 1. The customer expressly agrees with the aforementioned processing of the aforementioned personal data.**
- 2. The customer also agrees that personal data (master data, account data) will be transmitted to him via (unencrypted) e-mail among other channels.**

The customer can revoke the consent in whole or in part and without giving reasons at any time for the future without any form requirements. Moreover, imprebanca is obligated to secrecy about this data and may transfer it on only with the consent of the customer or if there is a legal obligation. The request for revocation or other data protection concerns must be addressed to: imprebanca, Via Cola di Rienzo 240, 00192 Rome (Italy); E-mail address: dpo.ib@imprebanca.it

Customer Information about data processing in accordance with Art. 13 and Art 14 of the EU General Data Protection Regulation (GDPR)

The protection of personal data is important to us at imprebanca. Therefore, imprebanca aims to comply with the data protection regulations in order to achieve sufficient protection and security of the customer data. With this document we wish to inform you about the processing of your personal data by imprebanca and the rights regarding data protection, to which you are entitled.

1. Who is responsible for data processing and who can you contact?

Responsible for the data processing is:
imprebanca S.p.A.
Via Cola di Rienzo, 240
00192 Rome (Italy)

Our corporate data protection officer can be reached at:
Data protection officer
Via Cola di Rienzo, 240
00192 Rome (Italy)
Email address: dpo.ib@imprebanca.it

2. Which data is processed by us and what are the sources for this data?

We process personal data that we receive from you in the context of the customer relationship. The customer relationship begins with the initiation of a contract and includes the completion of the contract. We also process data that we obtained permissibly from publicly available sources (e.g. commercial register).

Personal data from you that we process includes for example:

- first and last name, address, date and place of birth, nationality, occupational information, phone numbers, email address, bank account information, information on personal income, information on personal wealth, marital status, tax number, data from identification documents, login data, customer number, etc.

3. For what purposes and on what legal basis do we process the data?

(a) To fulfil contractual obligations (Art. 6 (1) lit b) GDPR):

We process personal data (Art 4 No. 2 GDPR) in order to provide our services under the deposit contract and other relevant required activities. Precontractual information that you provide as part of the registration process is also included.

(a) To meet legal obligations (Art. 6 (1) lit c) GDPR):

We may process personal data for the purpose of fulfilling various legal obligations, e.g. due to taxation law etc.

(b) Within the framework of your consent (Art. 6 (1) lit a) GDPR):

In case you give us consent for the processing of your personal data for specific purposes, we process data in accordance with the purposes and to the extent defined in the declaration of consent. You have the right to revoke your consent at any time with effect for the future.

(c) To protect legitimate interests (Art. 6 (1) lit f) GDPR):

Personal data are stored according to the above-mentioned legal requirements. In particular, the log of IP addresses, related to online arrangements, necessary for anti-fraud verification, is kept for 6 months

4. Who receives my personal data?

- Within imprebanca those departments and employees process your personal data, which need the data to fulfill the contractual obligations, legal obligations or legitimate interests.
- In addition, data processors (e.g. external IT service providers) and distribution partners contracted by us process your personal data if they need the data to perform their respective services. All data processors and distribution partners have a contractual obligation to treat your data as confidential and to process the data only within the framework of the provision of their services to us.

- Based on the fulfillment of legal obligations imprebanca may be obliged under certain circumstances to forward data to public bodies and institutions.
- Other persons may receive your data if you have given your consent for the transmission of data to such persons.

5. Does imprebanca transmit my data to a third country or an international organization?

In principle, your personal data will not be transmitted to a third country or international organization. In any case such transmission only occurs as part of a data processing agreement, an express consent by you or based on a legal obligation and taking into account legal restrictions.

6. How long will my data be stored?

- imprebanca stores your personal data no longer than absolutely necessary. In order to fulfil the contract, we store the data for the duration of the entire customer relationship.
- Based on legal retention and documentation requirements imprebanca can store data beyond the customer relationship.

7. Which privacy rights do I have?

(a) Right of information (Art. 15 GDPR):

Your right of information includes that you can request from imprebanca a confirmation whether we process personal data of you. Is this the case, you have the right to get information about this data and further information about how we process the data.

(b) Right to rectification (Art. 16 GDPR):

If your information is not correct (anymore), you have the right to claim for rectification of incorrect personal data by us.

(c) Right to erasure (Art. 17 GDPR):

You have the right to call for an immediate erasure of your data by us if any of the following applies:

- The keeping of the personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- You have revoked your consent and there is no other legal basis for processing.
- Your personal data has been processed without good reason.
- Your personal data must be deleted to meet legal requirements.

(d) Right to restrict processing (Art. 18 GDPR):

The right to restrict processing includes that you can require limited data processing if any of the following applies:

- The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data.
- The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead.
- imprebanca no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims.
- You have objected to the processing and the verification whether the legitimate grounds of the controller override those of the data subject is still pending.

(e) Right to object (Art. 21 GDPR):

If data processing takes place on the basis of a legitimate interest or of the public interest, you have the right to object to this data processing. Detailed information on your right of objection can be found at the end of this section.

(f) Right to data portability (Art. 20 GDPR):

You have the right to receive your personal data provided to us in a portable format and ask us to transmit such data to another controller without hindrance from imprebanca.

(g) Right to complain:

In case you believe that we process your data against national or European data protection law, we kindly ask you to contact us, to find a solution together. In addition, you have the right to object at the respective data protection supervisory authority.

(h) Revocation of consent for data processing:

A consent to the processing of personal data can be revoked at any time without any form requirements. This also applies with regard to the withdrawal of declarations of consent issued to us prior to the application of the GDPR, i.e. before 25 May 2018. We would like to point out that any revocation only applies for any future engagements.

8. Am I required to provide personal data?

- In the context of the customer relationship, you must provide the personal data necessary for the initiation and fulfilment of the customer relationship. Also, you must provide us with personal data necessary for the fulfillment of legal obligations.
- Should you disagree with the provision of these required personal data, we are not in a position to conclude or execute a contract with you.

9. Does imprebanca use automated decision making (including profiling)?

imprebanca does not use automated decision making in the sense of Art. 22 GDPR as part of the business relationship. imprebanca processes your data partially automated to evaluate certain

personal aspects (profiling) and to be able to provide the best possible service to you. In order to inform you about products in a targeted manner, we use evaluation tools that enable us to communicate and advertise on demand.

10. How can we change this customer information on data protection?

If necessary, we can adjust this data protection information. You can find the latest version of this information at any time on our Internet Platform [weltsparen.de](https://www.weltsparen.de).

Information of your right to object pursuant to Art. 21 of the EU General Data Protection Regulation (GDPR)

1. Individual case-related right of objection

You have the right, for reasons arising out of your particular situation, to object at any time against the processing of your personal data, which is based on the Art. 6 (1) lit e) GDPR (data processing in the public interest) and Art. 6 (1) lit f) GDPR (data processing on the basis of a balance of interests); this also applies to profiling within the meaning of Art. 4 (4) GDPR.

In case you object, we will no longer process your personal data unless we can prove compelling reasons for the processing that outweigh your interests, rights and freedoms, or the processing is for the assertion, exercise or defence of legal claims.

2. Right of objection against processing of data for direct advertising

In individual cases we process your personal data in order to operate direct advertising.

You have the right at any time to object to the processing of personal data relating to you for the purpose of such advertising; this also applies to profiling, as far as it is related to such direct advertising.

If you object to the processing for direct marketing purposes, we will no longer process your personal data for these purposes.