



#### **FOCUS ON YOUR RIGHTS**

With this document, we provide you with information in relation to the rights that **REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 (GDPR)** grants you in relation to the processing of your personal data (for full information, please refer to the full text of the GDPR, which is published on the website of Data Protection Authority).

#### **LAW**

#### **DESCRIPTION**

## a) Right of access\*

(Article 15 of the GDPR)

You have the right to have confirmation as to whether or not we are processing your personal data and to obtain the following information:

- the purposes of the processing;
- the categories of personal data processed;
- the recipients or the categories of recipients to whom personal data have been or will be disclosed, in particular if the recipients are third countries or international organisations;
- the period for which the personal data will be stored or the criteria used to determine that period;
- the existence of your right to request the rectification of personal data concerning you, their erasure and the restriction of their processing and to object to their processing;
- the existence of your right to lodge a complaint with a supervisory authority;
- all available information as to the source of the personal data concerning you and not collected from you;
- the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing.

If the personal data concerning you is transferred to a third country or to an international organisation, you shall have the right to be informed of the appropriate safeguards relating to the transfer.

At your request, we will provide you with a copy of the personal data concerning you that is being processed. If you request additional copies, we may charge you a fee reasonably based on the administrative costs. If you submit the said request via electronic means, and unless otherwise specified, we will provide you with the information in a commonly used electronic format.

#### \* The exercise of the right to obtain a copy of the data must not affect the rights and freedoms of others.

## **b) Right to rectification** (Article 16 of the GDPR)

You have the right to obtain, without undue delay, the rectification of personal data concerning you that you consider inaccurate.

You also have the right, taking into account the purposes of the processing, to obtain the completion of the personal data that concerns you and that you consider incomplete, also through an our supplementary statement.

### c) Right to erasure ("right to be forgotten") (Article 17 of the GDPR)

You have the right to obtain, without undue delay, the erasure of your data if, for example, one of the following reasons occurs:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you have withdrawn the consent on which the processing is based and there is no other legal ground for processing it;
- you have objected to the processing of personal data on the basis of specific provisions of the GDPR;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation to which we are subject. However, we will be unable to erase personal data to the extent that the processing is necessary, for example:
- to fulfil a legal obligation to which we are subject;
- for the performance of a duty performed in the public interest or in the exercise of official authority vested in us;
- for the establishment, exercise or defence of legal claims.

Fideuram – Intesa Sanpaolo Private Banking S.p.A., in forma abbreviata Fideuram S.p.A. Sede Legale: Piazza San Carlo, 156 10121 Torino Sede Secondaria con Rappresentanza Stabile: Via Melchiorre Gioia, 22 20124 Milano Capitale Sociale Euro 300.000.000,000 Registro Imprese di Torino e Codice Fiscale 00714540150 Società partecipante al Gruppo IVA Intesa Sanpaolo – Partita IVA 11991500015 (IT11991500015) N. Iscr. Albo Banche 1175 Codice ABI 3296.1 Aderente al Fondo Interbancario di Tutela dei Depositi e al Fondo Nazionale di Garanzia Appartenente al Gruppo Bancario "Intesa Sanpaolo" iscritto all'Albo dei Gruppi Bancari Socio Unico Direzione e Coordinamento Intesa Sanpaolo S.p.A.

## d) Right to restriction of processing

(Article 18 of the GDPR)

You have the right to obtain the restriction of processing from us where one of the following applies:

- you contest the accuracy of the personal data, in which case, the restriction will be applied for the period necessary to allow us to carry out the appropriate checks;
- the processing is unlawful and you oppose the erasure of the personal data, but require restriction of their use instead;
- the personal data is necessary for you to establish, exercise or defend a legal claim, even if we no longer need the data for the purposes of the processing;
- you object to the processing, pending the appropriate verification of whether the legitimate grounds override your grounds.

# e) Right to data portability\*

(Article 20 of the GDPR)

If the processing is carried out by automated means and is based on your consent or a contract, you have the right to:

- receive personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format;
- transmit them to another data controller, without hindrance on our part;
- have the personal data transmitted directly from one controller to another, where technically feasible.

# not affect the rights and freedoms of others f) Right to object

(Article 21 of the GDPR)

\* The exercise of this right must

You have the right to object at any time to the processing of personal data concerning you, including profiling, if the processing is necessary for the performance of a task of public interest or related to the exercise of official authority invested in us or for the pursuit of a legitimate interest of ourselves or third parties.

If you decide to exercise your right to object, we will refrain from further processing your personal data unless there are compelling legitimate grounds to proceed with the processing (grounds that override your interests, rights and freedoms), or the processing is necessary or for the establishment, exercise or defence of legal claims. Where your personal data is processed by us for direct marketing purposes, you have the right to object at any time to the processing and any related profiling activities. If you decide to exercise your right to object, your personal data will no longer be processed for this purpose.

### g) Right to lodge a complaint with the supervisory authority (Article 77 of the GDPR)

Without prejudice to your right to appeal to any other administrative or judicial remedy, if you consider that the processing of your data by us infringes the regulations on the processing of personal data, you may lodge a complaint with the competent supervisory authority for the protection of persona data.

#### h) Automated individual decision-making including profiling (pursuant to Article 22 of the GDPR)

The GDPR grants you the right not to be subject to a decision based solely on automated processing of your personal data (including profiling) which produces legal effects that concern you or significantly affect you, unless such a decision:

- is necessary for entering into or performance of a contract with us;
- is based on your explicit consent;
- is authorised by Italian or European law.

In the first two cases (contract and consent) we will implement suitable measures to safeguard your rights, your freedoms and your legitimate interests and in particular **your right to obtain human intervention, to express your point of view and to contest the decision**. In these cases, in the presence of automated decision-making, you have the right to receive meaningful information about the logic involved, as well as the significance and consequences of such processing.