

Data Protection Regulatory Manual

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The scope of this document includes Banca Ifis S.p.A., the Parent Company of the Banca Ifis Group, and its Italian-law subsidiaries. This document does not apply to foreign law subsidiaries, for which the Parent Company provides guidelines and methodological aspects to be followed by virtue of its coordinating role.

Scope of application	
<input checked="" type="checkbox"/> Banca Ifis S.p.A.	<input checked="" type="checkbox"/> Cap.Ital.Fin. S.p.A.
<input checked="" type="checkbox"/> Banca Credifarma S.p.A.	<input type="checkbox"/> Ifis Finance IFN SA
<input checked="" type="checkbox"/> Ifis Npl Servicing S.p.A.	<input type="checkbox"/> Ifis Finance Sp Zoo
<input checked="" type="checkbox"/> Ifis Npl Investing S.p.A.	<input checked="" type="checkbox"/> Ifis Rental Services S.r.l.
<input type="checkbox"/> Ifis NPL 2021-1 SPV srl	<input checked="" type="checkbox"/> Revalea S.p.A.

The Data Protection Regulatory Manual has been developed to comply with Regulation (EU) 2016/679 (GDPR) and Italian legislation on data protection. Its main purpose is to safeguard the personal data processed by Banca Ifis and its Italian-law subsidiaries, ensuring respect for fundamental freedoms and promoting a fair management of personal data.

Moreover, the Manual defines the guidelines that the various organisational units, branches and external collaborators involved in the processing of personal data have to follow in order to protect the rights of data subjects and ensure the correct application of organisational and procedural measures. The data controller, namely the Board of Directors for Banca Ifis, has the primary responsibility for data processing. The data controller is responsible for determining the purposes for which and the means by which personal data is processed, ensuring compliance with the principles set out in the GDPR. The Data Protection Officer (DPO), on the other hand, is a key figure within the organisation, responsible for ensuring compliance with privacy regulations. The DPO is tasked with collaborating with the Supervisory Authority, i.e. the Data Protection Authority, and acting as a point of contact for data subjects who have doubts or requests regarding the processing of their personal data.

The Manual also illustrates the processing of personal data carried out by Banca Ifis. The process follows the principles established by the GDPR, including:

- lawfulness, fairness and transparency: any processing needs a legitimate legal basis (such as consent, performance of a contract or a legal obligation) and the data subjects have the right to be clearly informed about the collection and use of their personal data;
- purpose limitation: personal data should only be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- data minimisation: personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- integrity and confidentiality: personal data should be secured by appropriate technical and organisational measures against unauthorised access, loss, destruction or accidental damage.

The Manual identifies several categories of personal data, including special ones (such as data concerning health, biometric data and relating to criminal convictions and offences). The processing of these categories of data requires the explicit consent of the data subject or should be justified by specific conditions, such as the need to protect a vital interest or to comply with legal obligations.

Consent is one of the lawful ground for data processing, especially for purposes that go beyond the execution of a contract. Consent must be explicit, informed and unambiguous, and Banca Ifis is

committed to providing all necessary information to data subjects, guaranteeing them the the right to withdraw thier consent at any time, without any prejudice.

The Manual highlights the importance of transparency in relations with data subjects, guaranteeing a series of rights, such as:

- access to data: every person has the right to know what personal data the Bank holds about them and how they are processed;
- rectification and erasure: data subjects may request the the modification of their data, if they are incomplete or inaccurate, or their erasure where there is no compelling reason for its continued processing.
- restriction of processing: in certain cases, data subjects may request to temporarily limit the type of processing operations that a controller can perform on their personal data;
- data portability: data subjects have the right to receive their personal data in a structured and machine-readable format and to transmit those data to another controller.

Banca Ifis implement technical and organisational measures in order to protect personal data from unauthorised access, loss or accidental destruction. These measures include access controls, encryption and data segregation policies, ensuring that only authorised persons can process the necessary data to perform their tasks. In the event of a data breach, the Bank has adopted procedures for the prompt handling of the incident, timely informing the Supervisor and, if essential, the data subjects. A Data Protection Impact Assessment (DPIA) is also conducted when the processing is likely to result in a high risk to the rights and freedoms of individuals.

The Manual regulates transfers of personal data to third countries, ensuring that they are protected by adequate safeguards in accordance with the GDPR. Therefore, any transfer requires to be justified by standard contractual clauses, approved codes of conduct or adequate certifications.

Furthermore, the document outlines the procedures for managing relations with suppliers and third parties that process personal data on behalf of the Banca Ifis Group. These parties are appointed as data processors and they are required to comply with the same security measures as the Bank.

Lastly, the document clarifies the importance of staff training on privacy issues. All employees and contractors who process personal data undergo specific and continuous training focused on the importance of data protection and the mandatory company procedures.

Accordingly, this Manual is an essential tool to guarantee that all personal data processing activities are conducted in compliance with european and italian regulations. Through a structured and monitored privacy management, the Bank is committed to protecting the rights of data subjects, ensuring transparency, security and compliance with the rules at every stage of processing.

