



## **Information on the processing of personal data pursuant to art. 13 EU Reg.**

### **2016/679 Data subjects: SPID customers**

Dear Customer,

Pursuant to Article 13 of Regulation (EU) 2016/679, concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter, "GDPR"), we inform you that Intesi Group Spa, with registered office at Via Torino 48 - 20123 Milan, as the Data Controller (hereinafter also "Controller"), will proceed with the processing of the personal data you have provided, in compliance with the GDPR, the Legislative Decree. June 30, 2003, no. 196 (so-called Code regarding the protection of personal data), as adapted to the GDPR by the legislative decree. August 10, 2018, no. 101, and of any other regulatory provision in force and/or that may be subsequently issued regarding the protection of personal data. This treatment will be based on the principles of fairness, lawfulness, and transparency.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned regulations and will be adequate, relevant, and limited to the purposes pursued.

**Purposes of processing:** your personal data are collected and stored by Intesi Group solely for the purpose of providing the SPID Digital Identity Service, in compliance with:

- Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market (hereinafter also "eIDAS Regulation")
- Leg. Decree 7 March 2005, no. 82, Digital Administration Code (hereinafter also "CAD")
- Prime Ministerial Decree (DPCM) of 24 October 2014 containing "*Definition of the characteristics of the SPID system, as well as the timeframes and methods for the adoption of the public system for the management of the digital identity of citizens and enterprises (SPID) by public administrations and enterprises*" as amended by the DPCM of 19 October 2021.

The **legal basis for the processing** of personal data consists of:

- the performance of a contract to which the data subject is party or the performance of pre-contractual measures adopted at the request of the same;
- the fulfillment of the above-mentioned legal obligations to which the controller is subject with regard to processing;
- the explicit consent of the data subject for identification, for the purposes of service provision, by means of tools that process biometric data.

Intesi Group reserves the right, where necessary, to process your personal data in order to assert and defend its rights in judicial proceedings. In this latter case, the processing shall be based on the lawfulness condition set out in art. 6, para. 1, letter f) of the GDPR.

In order to issue the digital identity, it is mandatory to identify the person to whom it is issued. The procedure, in compliance with the above-mentioned DPCM, may take place through:

(a) identification of the data subject in person by visual inspection of a valid identity document and, in the case of legal persons, of the procedure certifying the powers of representation, or more quickly

(b) by signing the SPID enrolment form with a qualified electronic signature; or (c) by remote identification by means of an audio-video session (d) through a dedicated mobile APP.

The **types of personal data** collected for the above-mentioned purpose:

- First and last name
- Tax code
- Phone number
- Email address
- Gender
- Identification document details
- Date and place of birth
- Biometric data
- Facial images and videos
- Any other information necessary for the establishment of the relationship and the subsequent performance of the contract

Optionally, information relating to the following may be collected:

- Membership of a nationally recognised professional register
- Powers of representation within the organisation of affiliation.

Where, for the purposes of service provision, the Controller should process special categories of personal data such as biometric data, in compliance with art. 9, paragraph 2, letter a) of the GDPR, it shall obtain the explicit and specific consent of the data subject.

**Methods of processing:** Your personal data may be processed in paper format or with electronic tools in ways strictly related to the purposes indicated above and in compliance with the provisions of Article 32 of the GDPR regarding security measures.

For the pursuit of the purposes described above, Intesi Group will communicate your personal data to its employees, equivalent staff, collaborators acting as authorised persons and/or data processors and, in particular, to the following categories of personnel: support area, operators authorised and enabled by Intesi Group to carry out identification activities; administration office, consultants and self-employed professionals, including in associated form.

The personal data collected will not be disclosed or communicated to third parties, except for necessary communications which may involve the transfer of data to public authorities or consultants for the fulfilment of legal obligations.

All natural persons within the Controller's organisation who are Authorised to Process personal data operate in compliance with art. 29 of the GDPR.

To ensure the integrity of the digital identity issuance process, the Data Subject's personal data may be disclosed to third parties, duly appointed as data processors. Such processing will be carried out in accordance with Regulation 679/2016.

It is also specified that Intesi Group, for the processing of special categories of data such as biometric data, makes use of a service provided by a third party duly appointed as data processor, which provides sufficient guarantees to implement appropriate technical and organisational measures so that the processing meets the requirements of Regulation 679/2016 and ensures the protection of the rights and fundamental freedoms of the data subject.

For any information on the matter, contact this address: [privacy@intesigroup.com](mailto:privacy@intesigroup.com).

Your personal data is processed and stored on servers located within the European Union. Please be informed that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to art. 5 of the GDPR, the retention period of your personal data is limited to the time necessary to achieve the purposes for which they are collected and processed and, in any case, not exceeding 20 (twenty) years from the end of the relationship, except for biometric data only, which are processed for a period not exceeding the achievement of the purposes for which they are collected.

The Data Controller has appointed, pursuant to Article 37 of the GDPR, a **Data Protection Officer** ("DPO"), whom you may contact to exercise your rights, as well as to receive any information related to them. Below are the DPO's references: Lawyer Andrea Lisi can be contacted at the following address: email [dpo@intesigroup.com](mailto:dpo@intesigroup.com)

Intesi Group reserves the right to modify and/or update this information notice also based on legislative and regulatory developments of the applicable data protection laws, as well as in response to any interventions by the competent Authorities. Any changes will be communicated to you through the official channels of Intesi Group.

You have the right to obtain **the erasure (right to be forgotten), restriction, updating, rectification, portability, objection** of the processing of personal data concerning you, as well as, in general, you can exercise all the rights provided by Articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

It is specified that Intesi Group, as Digital Identity Provider, is required to retain all information relating to the SPID Digital Identity for 20 (twenty) years starting from the expiry or revocation of the digital identity as provided for by art. 7, para. 8 of the DPCM of 24 October 2014; therefore, for any requests for erasure, rectification and updating before the natural expiry of the term, the provisions of art. 17, para. 3, letter b) of the GDPR shall apply.

Without prejudice to the fact that the exercise of your rights as a data subject is free of charge pursuant to Article 12 of the GDPR, where requests are manifestly unfounded or excessive, particularly due to their repetitive nature, the Data Controller may charge you a reasonable fee

considering the administrative costs incurred to provide the information or communication or to take the requested action.