



Privacy Notice on the Processing of Personal Data pursuant to Article 13 of Regulation (EU) 2016/679 – Use of Tracking Pixels

Dear User,

Pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter “GDPR”), we inform you that Intesi Group S.p.A., with registered office at Via Torino 48, 20123 Milan, Italy, acting as Data Controller (hereinafter also the “Controller”), will process the personal data you provide in compliance with the GDPR, Legislative Decree No. 196 of 30 June 2003 (the Italian Personal Data Protection Code), as amended to align it with the GDPR by Legislative Decree No. 101 of 10 August 2018, and any other applicable legislation currently in force or subsequently enacted concerning personal data protection. Such processing will be carried out in accordance with the principles of fairness, lawfulness and transparency.

Your personal data will be processed in accordance with the legislative provisions referred to above and will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Purposes of processing: Intesi Group collects and stores your personal data solely for the purpose of sending informational and commercial communications and analysing their effectiveness by means of IT tools known as tracking pixels (or simply “pixels”). These graphic elements consist of very small images, often reduced to the smallest graphic unit displayable on a screen—the pixel—and are generally invisible to the recipient. They are embedded in emails in the form of hyperlinks. When a communication is opened, code included in the message may automatically trigger a request to the server to download the image, thereby allowing the sender to determine that the email has been opened and to collect further information about the recipient’s interaction with the message.

Personal data are processed for the following purposes:

- a) Monitoring interactions with commercial communications, in order to detect email opens and measure recipients’ interactions with the campaigns sent;
- b) Analysing and improving marketing campaigns, in order to assess their effectiveness and compile related statistics;
- c) Technical management of communications and service security, in order to identify any sending

anomalies and minimise the risk of improper use of the sending systems.

The **legal basis** that makes the processing described in this notice lawful is Article 6(1)(a) GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes.”

The **personal data** processed by Intesi Group are:

- Identification and contact data: first name, last name and email address associated with the recipient;
- Tracking and interaction data collected through pixels: IP address, device used, viewing time and number of times the message has been opened.

Tracking pixels do not, in themselves, make it possible to know the content of the emails sent. However, they monitor whether the message in which they are embedded is opened, as well as whether it may be deleted, forwarded or archived.

Methods of processing: Your personal data may be processed using electronic tools and methods strictly related to the purposes indicated above, in compliance with Article 32 GDPR on security measures.

Please note that both the provision of an email address to receive commercial communications and consent to tracking are optional. However, if the necessary data are not provided or the required legal basis is absent, the Controller may be unable to send such communications. If consent is withheld solely for tracking purposes, this will not affect your ability to receive commercial communications, provided that you have given specific consent to receive them.

For the management, creation and sending of commercial and informational emails, Intesi Group uses a platform provided by a third party appointed as a data processor. This provider offers sufficient guarantees to implement appropriate technical and organisational measures so that processing complies with the requirements of Regulation (EU) 2016/679 and safeguards users’ rights.

For further information, please contact: privacy@intesigroup.com

Your personal data are processed and stored on servers located within the European Union, where applicable to the configuration of the service used. However, in connection with technical support activities or the involvement of any sub-processors or third-party suppliers, personal data may also be accessed or processed in countries outside the European Union. Any such transfers are carried out in compliance with Articles 44 et seq. GDPR.

In accordance with the principles of lawfulness, purpose limitation and data minimisation set out in Article 5 GDPR, your personal data are retained only for as long as necessary to achieve the purposes for

which they are collected and processed. In any event, the retention period will not exceed the term of the contractual relationship with the provider of the platform used to send and manage commercial communications, unless a shorter retention period is necessary in light of the specific processing purposes or the data subject withdraws consent.

The Controller has appointed a Data Protection Officer (“DPO”) pursuant to Article 37 GDPR. You may contact the DPO to exercise your rights or obtain information about them at: dpo@intesigroup.com.

Intesi Group reserves the right to amend and/or update this notice in light of developments in the applicable data protection laws and regulations or any measures taken by the competent Authorities. Any changes will be communicated through Intesi Group’s official channels.

You have the **right to request erasure (the right to be forgotten), restriction, updating, rectification and portability** of your personal data, and may generally exercise all the rights provided for under Articles 15, 16, 17, 18, 19, 20, 21 and 22 GDPR.

The exercise of your rights as a data subject is free of charge pursuant to Article 12 GDPR. However, where requests are manifestly unfounded or excessive, in particular because of their repetitive nature, the Controller may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested.