INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE EXCHANGE OF KYC DATA WITHIN UNICREDIT GROUP ENTITIES PURSUANT TO THE ARTICLE 14 OF GENERAL REGULATION ON THE PROTECTION OF PERSONAL DATA ("GDPR")

The following information notice is intended to provide an overview of the use of your personal data and your rights under the General Data Protection Regulation - Regulation (EU) 2016/679 (hereinafter also, "GDPR") carried out by the entities of the UniCredit Group, listed in *Appendix 1* to the information notice which act as Autonomous Data Controllers for the purposes referred to in paragraph 1 below (hereinafter also "**Controllers**").
This information notice is also addressed to individuals who, for various reasons, are connected to UniCredit Group Clients (such as, by way of example, legal representatives, directors, shareholders, beneficial owners, attorneys-in-fact, guarantors, etc., hereinafter collectively referred to as the "Related Parties"), whose personal data may be collected or disclosed to the Bank in the context of the business relationship.
As a recipient of this notice, you are therefore requested to provide a copy of it to any Related Parties, in order to inform them about the purposes and methods by which the Controllers process their personal data.

The **Data Protection Officers** (DPO) of the companies of the UniCredit Group Controllers are indicated, respectively, in *Appendix 1* to this information notice.

1. PURPOSE AND LEGAL BASIS OF PROCESSING

The Data Controllers process the personal data in their possession, collected either indirectly from the data subject (*e.g.*, communicated by the company with which the data subject has an employment relationship or another form of professional engagement) or from public sources. The transfer of such personal data to the Data Controllers is based on:

(i) the necessity to process the personal data of the data subject in order to give effect to a request made by the data subject's Company to establish or perform a business relationship with the Data Controllers, on a controller-to-controller basis between the UniCredit Group Legal Entities involved, such processing being necessary to take steps at the request of, or for the performance of, that business relationship (Article 6(1)(b) GDPR); or
(ii) in some jurisdictions[1], where local requirements so require (e.g. Germany), the data subjects' consent collected by the company communicating the personal data to UniCredit Group Legal Entities.

The subsequent processing of such personal data by the Data Controllers for KYC purposes is instead based on compliance with the legal obligations to which the Data Controllers are subject under the applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulatory frameworks (Article 6(1)(c) GDPR), including the following purposes:

A. **Need to coordinate "know-your-customer" ("KYC") activities within UniCredit Group as far as this in necessary for the establishment and performance of a business relationship (including ongoing periodic KYC monitoring).** The purpose of the processing lies in the compelling necessity to process the personal data of the data subject in order to establish a business relationship between the Data Controllers and the company with which the data subject has an employment relationship or another form of professional engagement, including the periodic updating ("KYC refresh") of customer information. Such updates are carried out at defined intervals based on the level of risk associated with the client, in accordance with applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulatory frameworks. UniCredit Legal Entities can share with other Group Legal Entities, on a controller-to-controller basis, all information, data and documents, provided by your Company and / or available through public registers, necessary to comply with KYC duties according to the applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulatory frameworks. Such sharing does not take place indiscriminately with all UniCredit Group Legal Entities: it is limited to the specific Legal Entity with which your Company has requested to establish a new business relationship, or with which your Company already maintains an existing business relationship, and is triggered by and carried out to satisfy your Company's own request. This enables the receiving UniCredit Group Legal Entity to leverage data already collected within the Group in order to comply with its own AML/CTF customer due diligence obligations, including for the purposes of

[1] For example for Germany, the processing of personal data based on data subject's consent is lawful only when the consent is collected. For this reason, by communicating to one of the Legal Entities belonging to UniCredit Group the personal data referrable to your Related Parties, you confirm that the consent of the impacted Related Parties to share the data with UniCredit Group has been duly and appropriately obtained under your care and responsibility.

periodic review and updating of customer information in line with the applicable risk-based approach, as well as to facilitate the assessment and establishment of new business relationships with other UniCredit Group Legal Entities, where applicable and in compliance with the relevant regulatory requirements.

The personal data referrable to your Related Parties is processed on the same legal bases described in paragraph 1 above. In particular, the subsequent processing is grounded on the Data Controllers' compliance with the applicable AML/CTF obligations, and will include the identification of persons connected to the Company.

The data exchange activity is carried out upon the client's request and is offered by UniCredit Group to facilitate the completion of KYC checks, conducted in compliance with the applicable Anti-Money Laundering (AML) regulations locally applicable.

2. THE CATEGORIES OF PERSONAL DATA CONCERNED

The Data Controllers process personal data collected indirectly from you which include, but are not limited to

a. **personal data referrable to your Related Parties** (*e.g.* name, surname, date and place of birth etc.). This includes the sharing and use of information, data and documents already collected within the UniCredit Group, as well as the periodic review and updating of customer information based on the risk level associated with the client, in accordance with a risk-based approach.

3. RECIPIENTS OR RECIPIENTS' CATEGORIES OF PERSONAL DATA

The data may be communicated:

I. to those subjects (e.g. administrative, judicial, supervisory and control authorities) to whom such communication has to be made in compliance with an obligation provided for by law, by a regulation or by the EU regulations;

II. other legal entities belonging to the UniCredit Group with whom you have/will have a business relationship strictly in order to fulfill their KYC checks duties, conducted in compliance with the applicable Anti-Money Laundering (AML) regulations locally applicable.

These recipients process personal data as **Autonomous Data Controllers**. For information on the categories of Autonomous Data Controller to whom the data may be communicated you can refer to the contact details of the Data Controllers listed in *Appendix 1* to this information notice.

Your data may also be disclosed to **persons authorized to process personal data**, in relation to the data necessary to perform the tasks assigned to them, natural persons belonging to the following categories: workers employed by the Bank or seconded to it, temporary workers, interns, consultants and employees of external companies appointed as data processors.

4. DATA TRANSFER TO THIRD COUNTRIES

The Data Controllers inform you that your personal data may also be transferred to the Countries outside the European Union or the European Economic Area (so called "Third Countries"), when the EU Commission decided that the Third Country ensures an adequate level of protection of personal data or, otherwise, in case of other appropriate safeguards ensuring contractually a level of personal data protection appropriate (*e.g.* through the signing of the standard contractual clauses provided by the European Commission) including enforceable and effective data subject rights. Further information can be requested by writing to the Data Controllers' contact details indicated, respectively, in *Appendix 1* to this information notice.

5. DATA PROCESSING MODALITIES

The processing of personal data involves the use of manual, IT and ICT instruments with rationale closely connected with the purposes defined above and, in any case, in such a way as to guarantee the security and confidentiality of the data.

6. DATA SUBJECT RIGHTS

The GDPR grants and assures specific rights, including the right to know what data concerning you are held by the Data Controllers (**right of access**), as well as how they are used, and the right to obtain, under certain conditions, the **copy**, the **erasure**, as well as the **update**, the **rectification** or, if interested, the **data integration**, the **restriction of processing**, as well as the right to **data portability**.

7. DATA RETENTION PERIOD AND RIGHT TO ERASURE

The Data Controllers process and store your personal data for the observance of the applicable legal and regulatory obligations, as well as for its own or third party defensive purposes. Records are maintained to the extent that they are still valid for the Compliance purposes described in paragraph 1 above and periodically reviewed to keep the data updated.

At the end of the applicable retention period, the personal data will be **deleted** or **stored in a form that does not allow your identification** (e.g. irreversible anonymization), unless their further processing is necessary for one or more of the following purposes: i) resolution of pre-litigation and/or litigation initiated before the expiration of the retention period; (ii) to follow up on investigations/inspections by internal control functions and/or external authorities initiated before the expiry of the retention period; iii) to follow up on requests from public authorities received/notified to one of the Legal Entities belonging to UniCredit Group before the expiry of the retention period.

8. PROCEDURE TO EXERCISE THE RIGHTS

To exercise the rights described above, you can refer to the Controllers' contact details indicated, respectively, in *Appendix 1* to this information notice.

The deadline for the reply is **one (1) month**, that may be extended by **two (2) further** months in cases of particular complexity; in these cases, the Data Controllers inform you about such extension within **one (1) month** of receipt of the request.

The exercise of rights is, in principle, free of charge. The Data Controllers reserve the right to ask for a contribution in case of manifestly unfounded or excessive requests (also repetitive).

9. COMPLAINT OR REPORTING TO THE DATA PROTECTION AUTHORITY

You have **the right to lodge a complaint** or **make a report** to the locally competent supervisory authority or else appeal to the competent Judicial Authority.

Appendix 1
Data Controllers

Data Controllers	Contact details of the Data Protection Officer	Contact details of the data controller for information on data processing activities and for the exercise of data subjects' rights
UniCredit S.p.A. **Piazza Gae Aulenti n. 3** **Tower A** **20154 Milano** **Italy**	*Data Protection Office*, Piazza Gae Aulenti n. 3, Tower A, 20154 Milano, Italy E-mail: Group.DPO@unicredit.eu PEC: Group.DPO@pec.unicredit.eu	diritti.privacy@unicredit.eu
UniCredit Bank Austria AG **Rothschildplatz 1** **1020 Wien, Österreich** **Austria**	*Data Protection Office* Bank Austria - Member of UniCredit Rothschildplatz1 1020 Wien, Österreich E-Mail: dpo_notification@unicreditgroup.at	dpo_notification@unicreditgroup.at
UniCredit Bank a.d. Banja Luka ***Marije Bursać 7*** ***78000 Banja Luka, Bosnia and Herzegovina***	*Data Protection Officer / Compliance* *UniCredit Bank a.d. Banja Luka* *Marije Bursać 7* *78000 Banja Luka, Bosnia and Herzegovina* *Email: DPOubb@unicreditgroup.ba*	*DPOubb@unicreditgroup.ba*
UniCredit Bulbank AD **7 Sveta Nedelya Sq, 1000** **Sofia** **Bulgaria**	*DPO@unicreditgroup.bg*	*callcenter@unicreditgroup.bg*
Zagrebačka banka d.d. **Trg bana Josipa Jelačića 10** **10 000 Zagreb** **Croatia**	*Data Protection Officer / Compliance* *Zagrebačka banka d.d.* *Trg bana Josipa Jelačića 10* *10 000 Zagreb* *Croatia* *E-mail:* *sluzbenik.za.zastitu.osobnih.podataka@unicreditgroup.zaba.hr*	*Zagrebačka banka d.d.* *Trg bana Josipa Jelačića 10* *10 000 Zagreb* *Croatia* *E-mail:* *sluzbenik.za.zastitu.osobnih.podataka@unicreditgroup.zaba.hr*
UniCreditBank Czech Republic and Slovakia a.s ***Želetavská 1525/1*** ***140 92 Praha 4***	***Pověřenec pro ochranu údajů*** ***Útvar Compliance*** ***UniCreditBank Czech Republic and Slovakia a.s*** *Želetavská 1525/1* *140 92 Praha 4* *Email: dpo@unicreditgroup.cz*	*dpo@unicreditgroup.cz*
UniCredit Bank GmbH **Datenschutzbeauftragte** **Postfach** **80311 München** **Germany**	*Data Protection Office* Postfach 80311 München Email: DatenschutzHVB@unicredit.de	datenschutzrechte@unicredit.de
UniCredit Bank Hungary Zrt. ***Szabadság tér 5-6.*** ***1054 Budapest*** ***Hungary***	*Data Protection Officer / Compliance* *UniCredit Bank Hungary Zrt.* *Szabadság tér 5-6.* *1054 Budapest* *Email: adatvedelem@unicreditgroup.hu*	*adatvedelem@unicreditgroup.hu*

Data Controllers	Contact details of the Data Protection Officer	Contact details of the data controller for information on data processing activities and for the exercise of data subjects' rights
UniCredit Bank d.d. **Kardinala Stepinca bb** **88000 Mostar, Bosna i Hercegovina**	Data Protection Officer / Compliance UniCredit Bank d.d. Kardinala Stepinca bb 88000 Mostar, Bosna i Hercegovina Email: DPO@unicreditgroup.ba	DPO@unicreditgroup.ba
UniCredit Bank S.A, a company managed under a dual system, with headquarters in **Romania, 1F Expozitiei Bvd, Bucharest**, **1st sector**, registered within the Trade Register under no. J1991007706408, EUID: ROONRC.J1991007706408 and within the Bank Register under no. RB- PJR-40-011/18.02.1999, unique registration code 361536, tax attribute RO, subscribed and paid-up capital 589.955.162,70 RON.	*Data Protection Office* Romania, 1F Expozitiei Bvd, Bucharest, 1st sector *dpo@unicredit.ro*	*- written request, dated and signed, sent to UniCredit Bank SA, at the address: 1F Expozitiei Bvd, no. 1 F, 1st sector, Bucharest, postal code 012101* *- e-mail at infocenter@unicredit.ro* *- calling the number +40 21 200 2020 or *2020*
UniCredit Bank Serbia JSC **Rajićeva 27-29, Belgrade** **Serbia**	*Data Protection Office* *Jurija Gagarina 12, Belgrade* *E/mail: dpo@unicreditgroup.rs*	*dpo@unicreditgroup.rs*
UniCredit Banka Slovenija d.d. **Ameriška ulica 2** **1000 Ljubljana** **Slovenia**	*Data Protection Officer* *UniCredit Banka Slovenija d.d.* *Ameriška ulica 2* *1000 Ljubljana, Slovenia*	*dpo@unicreditgroup.si*