



## **Abstract of the Personal Data Protection Policy**

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## **1. INTRODUCTION**

Banca Generali regards the protection of Personal Data as a priority for safeguarding the fundamental rights and freedoms of its customers.

Accordingly, in compliance with the relevant European legislation, i.e., the General Data Protection Regulation (GDPR), the Bank has adopted a Personal Data Protection Policy aimed at highlighting the key principles and fundamental requirements in processing personal data.

## 2. KEY REQUIREMENTS

### 2.1. Lawful, fair and transparent processing of personal data

In accordance with the GDPR principles of lawfulness, fairness and transparency, Banca Generali undertakes to ensure that personal data are processed lawfully, fairly and in a transparent manner and collected for specified, explicit and legitimate purposes.

### 2.2. Consent and circulation of policy statement

The Company circulates a policy statement to Data Subjects regarding the processing to be carried out and requests their consent before processing begins through the Persons in Charge of the Processing, such as employees and Financial Advisors, or through the use of remote and/or online communications media.

Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the Data Subject's agreement and requested for each purpose of processing.

### 2.3. Protection by design e by default

Banca Generali ensures compliance with Personal Data protection *by design e by default*.

- **Privacy by design:** the Bank identifies and implements appropriate technical and organisational measures designed to ensure compliance with the principles dictated by GDPR from the planning of processing, while determining the purposes and means (such as pseudonymisation or anonymisation of the data) in advance.
- **Privacy by default:** appropriate technical and organisational measures must ensure by default that the personal data collected are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; the same principle applies with regard to the amount of Personal Data collected, the extent of Processing, the period of their storage and their accessibility.

The following elements are assessed in application of the above principles:

- amount of the personal data to be collected;
- extent of the processing activities;
- the storage period;
- number of parties having access to the personal data.

## 2.4. Third parties

Where a third party is entrusted with personal data processing activity, the Bank, where appropriate, appoints a Data Processor, who is selected on the basis of his ability to provide sufficient guarantees to implement appropriate technical and organisational measures to ensure compliance with GDPR requirements.

## 2.5. Storage

In the personal data storage phase, Banca Generali applies the principle dictated by privacy legislation of **storage limitation**: data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

## 2.6. Amendments to the Policy

Where significant changes are made to personal data processing, data subjects are informed in a timely manner, so as to update them regarding the new approaches to processing their personal data. The Record of Processing Activities is also kept up to date for this purpose.

## 2.7. Personal data breaches

In the event of a personal data breach, Banca Generali undertakes to notify the said breach to the supervisory authority competent in a timely manner, without undue delay and in accordance with the timescales established by law.

If the breach in question may entail a high risk for the rights and freedoms of the Data Subjects, the Bank shall also inform the Data Subjects of the breach.

For this purpose, the Bank has implemented a record of personal data breaches and establishes internal procedures that ensure it is kept up to date upon each violation.

Among the various information, the record includes:

- the circumstances of the breach;
- the consequences of the breach;
- the measures adopted to contrast it and limit its effects;
- the involved personal data;
- the reasons for not carrying out the notification, or for carrying it out after 72 hours.

Security measures suited to preventing personal data breaches, adequate to identifying and combating breaches that have occurred, are also envisaged.

### **3. COMMITMENT AND IMPLEMENTATION OF STANDARDS**

#### **3.1. Person in Charge of the Processing and Contact Persons**

As part of its general commitment to implement the main data protection legislation, the Bank establishes internal procedures for the appointment of the Persons in Charge of the Processing and Contact Persons, who are assigned specific duties for privacy purposes.

#### **3.2. Training**

The Persons in Charge of the Processing and Contact Persons are also ensured adequate training through the organisation of specific courses and the provision of precise instructions regarding how processing should be performed. To this end, Banca Generali organises training events dedicated to the Persons in Charge of the Processing regarding personal data protection, applicable legislation in force and the privacy structure adopted.

#### **3.3. Documentation of activity**

The Bank maintains precise documentation regarding the activities performed to ensure that processing is carried out in accordance with applicable legislation.

#### **3.4. Updates**

Where necessary, Banca Generali revises its Personal Data Protection Policy in order to ensure that it complies with the law and to adapt its personal data processing standards to industry best practices.