

## INTEGRATED CUSTOMER DUE DILIGENCE (“CDD”) FORM

(PURSUANT TO ITALIAN LEGISLATIVE DECREE N. 231/2007 IMPLEMENTING Directive (EU) 2015/849 AS AMENDED)

By signing this Form, the interested party declares to have read the "Information notice for customers" section contained at the bottom of it. We also invite you to read the information provided on the customer's obligations and on the criminal sanctions provided for by Legislative Decree no. lgs. n. 231/2007 in case of false or untruthful declarations. **The information contained in this Form, once completed, is to be considered confidential.**

### A. CUSTOMER IDENTIFICATION

**Registered legal name:**

**Tax Code (if any)<sup>1</sup>:**

**Legal form:**

**Geographical area where the activity is mainly carried out:**

**Is the Customer a company listed on a European regulated market?** YES  NO

**Registered office**

**Legal address:**

**City:**

**Country:**

*If the client is a non-profit organization, indicate the type(s) of beneficiaries the activities are directed to:*

**Type(s) of beneficiaries:**

### B. STATEMENT ON ENTITY LIABILITY AND MAJOR SANCTIONED COUNTRIES (“MSC”)

#### B.1 CUSTOMER STATEMENT

- a) Has the Customer adopted and implemented a compliance program that includes an organization, management and control model and precautions aimed at preventing offences committed in the interest or advantage of the Customer?  YES  NO
- b) Has any precautionary measure been enacted or has any conviction (including through agreement to a plea bargain) been issued against the Customer and/or its parent and/or subsidiaries in relation to offences under Italian Legislative Decree 231/2001 and/or equivalent foreign laws on entities' liability for offences committed in their interest or advantage?  YES  NO  
Is any proceeding or investigation pending against the Customer or its parent and/or subsidiaries
- c) offences under Italian Legislative Decree 231/01 and/or equivalent foreign laws on entities' liability for offences committed in their interest or advantage?  YES  NO  
(If applicable) In the last five years was the Customer or any member of the Customer's Group served with any communication pursuant to articles 84 et seq. of Italian Legislative Decree n.
- d) 159/2011 (documentazione antimafia di carattere interdittivo) restricting activities due to connection with organized crime?  YES  NO  
Does the customer's activity comply with the restrictive measures and economic and trade
- e) sanctions adopted by the United Nations, the Office of Foreign Assets Control (OFAC) and the European Union?  YES  NO  
Does the customer, directly or indirectly through associates, parent companies or subsidiaries,
- f) carry out activities linked to anti-personnel mines, cluster munitions and submunitions as identified by article 1(1) of the Italian Law No. 220 of December 9, 2021<sup>2</sup>?  YES  NO

If the answer to questions b) or c) is affirmative, provide, in a specific declaration to be attached to this Form, further information on the state of the procedure, including any precautionary measures applied and / or sentences pronounced, on the company concerned (ie Customer and / or subsidiaries and / or parent companies) and on the natural persons involved, also specifying the types of offense and the time references.

If the answer to question d) is affirmative, provide, in a specific declaration to be attached to this Form, further information on the situations that led to the issue of anti-mafia documentation of an interdictive nature and on the relative consequences and effects, also specifying the company concerned ( ie Customer and / or subsidiaries and / or parent companies), the time references, the remedial actions implemented and the possible revocation of the interdictive subsequently intervened.

<sup>1</sup> Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

<sup>2</sup> "Construction, production, development, assembly, repair, conservation, use, utilization, warehousing, possession, promotion, sale, distribution, import, export, transfer or transportation of antipersonnel mines, cluster munitions and submunitions, of any nature or composition, or parts thereof".

**B.2 “MSC Questionnaire” – Aggregate exposure to Major Sanctioned Countries (MSC):**

Please provide the following information about the Customer, its parent and/or subsidiaries (as applicable), its affiliates (including foreign branches) and joint ventures to which it participates (jointly, the “Group” or the “Group Entities”):

- a) Current or planned location either legal (e.g. registered office, other offices, including non-active offices, etc.) or operational (e.g. factories, branches, representative offices, etc.);
- b) Business relationships (e.g. transactions, investments, other activities) generating approximately more than 5% of total revenues either of the Customer, or of the relevant revenue-generating Group’s company, or of the Group in aggregate;
- c) Place of residence or citizenship of any Customer’s board members or, to the best of the Customer’s knowledge, of any board member of any Group Company directly or indirectly involved in the transaction/business relationship;
- d) Transactions to/from MSC (regardless of their value) involving the oil & gas sector, nuclear energy, arms and weapons, dual use goods or technologies.

**If yes, please fill the boxes with details on the relevant exposure:** (i) the name of the relevant company; (ii) % of MSC-generated revenues compared to the relevant company’s revenues; (iii) % of MSC-generated revenues compared to the Group’s aggregate revenues; (iv) whether the relevant Company is directly or indirectly involved in the transaction/business relationship; (v) source of MSC-generated revenues (transactions, investments, etc.) generated in the MSC.

**AGGREGATE EXPOSURE TO NORTH KOREA**

YES     NO

**Reason of exposure:**     a)     b)     c)     d)

**AGGREGATE EXPOSURE TO SYRIA**

YES     NO

**Reason of exposure:**     a)     b)     c)     d)

**B.2 “MSC Questionnaire” – Aggregate exposure to Major Sanctioned Countries (MSC):**

**AGGREGATE EXPOSURE TO VENEZUELA**

YES NO

Reason of exposure:  a)  b)  c)  d)

**AGGREGATE EXPOSURE TO IRAN**

YES NO

Reason of exposure:  a)  b)  c)  d)

**AGGREGATE EXPOSURE TO CRIMEA**

YES NO

Reason of exposure:  a)  b)  c)  d)

**AGGREGATE EXPOSURE TO Non-Controlled Areas of Ukraine**

The expression "Non-Controlled Areas of Ukraine" means the areas of Ukraine not controlled by the Ukrainian government as defined in the notion of "specified territories" pursuant to Article 1 of Regulation (EU) no. 263/2022.

YES NO

Reason of exposure:  a)  b)  c)  d)

**B.2 "MSC Questionnaire" – Aggregate exposure to Major Sanctioned Countries (MSC):**

**AGGREGATE EXPOSURE TO BIELORUSSIA**

YES  NO

Reason of exposure:  a)  b)  c)  d)

**AGGREGATE EXPOSURE TO RUSSIA**

YES  NO

Reason of exposure:  a)  b)  c)  d)

**IF ANY EXPOSURE TO RUSSIA AND/OR BIELORUSSIA IS DECLARED:**

- 1) indicate if such exposure concerns one of the following sectors and if selected, the the exposure in terms of percentage of the company or Group revenues
    - (a) Energy
    - (b) Aerospace
    - (c) Minerals
    - (d) Telecommunications
    - (e) Trasport
    - (f) Defence
    - (g) Siderurgy
    - (h) Luxury
  
  - 2) confirm that such exposure does not concern:
    - (a) business relations with the Donbass or other territories of Ukraine not subject to Ukrainian government control as a result of military intervention by the Russian Federation;
    - (b) business relationships with entities or individuals subject to asset freeze measures;
    - (c) dual-use goods and technologies;
    - (d) quasi-dual-use assets that could aid in Russia's military and technological advancement or in the development of the defense and cyber security, information security, sensor and laser, marine, aerospace and propulsion;
    - (e) other business relationships, services, goods and technologies subject to restrictive measures adopted following the Russian-Ukrainian crisis.
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## C. TAX TRANSPARENCY DECLARATIONS

Please indicate if:

- a) the Customer
- b) the Customer's beneficial owner
- c) the Customer's controlling shareholders

have their legal seat/place of residence if a Country of Barrage<sup>3</sup>

1. if yes, please identify the relevant individual/entity referred to in letters a), b) and c), the legal seat/residence country:

Type of subject ((a), b), c)	Subject (name surname/legal name)	Country
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2. If the relevant individual/entity referred to in letters a), b) or c) have their legal seat/place of residence in a Country of Barrage please confirm that:

2.1. there are sound business reasons (other than tax reasons) for such location and it is not aimed at taking advantage of the technicalities of a tax system or of mismatches between two or more tax systems for the purpose of reducing tax liability;  YES  NO

2.2. they have effective physical location links with such country (for example: a significant proportion of the investments in tangible and/or intangible assets are made within such country, operations in such country are carried out through local offices, revenues are generated locally, staff is employed locally and/or taxes are being paid locally)  YES  NO

3. Indicate whether the individual/entity referred to in letters a), b), c) having their legal seat/place of residence in a Country of Barrage were the recipients of a definitive decision, also of an administrative nature, of assessment or subject of disputes or proceedings by the competent authorities regarding:

3.1. failure to comply with the obligations relating to the payment of taxes and duties or with the obligations relating to the payment of social security contributions according to applicable law;  YES  NO

3.2. the establishment of an entity in any jurisdiction with the intention of evading tax, social security or other legal obligations  YES  NO

If yes, please identify the relevant individual/entity referred to in letters a), b) and c) and provide the details required

Type of subject ((a), (b) (c))	Subject (name surname/legal name)	Authority	Description of the conduct ascertained by the final decision or object of dispute or proceedings and the state of the same
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If any of the answers to point 2 or 3 above is Yes, please provide any useful additional information concerning the answer provided or attach reference documents which might be useful to substantiate the sound business reasons for links identified:

<sup>3</sup> Countries for which the competent European and international authorities have found an unsatisfactory application of the internationally agreed standards on anti-money laundering and prevention of terrorist financing and, jointly, tax transparency. For the purposes of this Form, such countries are Panama, Trinidad and Tobago and Vanuatu. 5

#### D. IDENTIFICATION OF THE EXECUTOR (the Undersigned)

When the Customer is a legal entity, “executor” means the natural person acting on behalf of the customer upon due authorization (i.e. person empowered to act).

##### Source of the power to act on behalf of the customer:

Legal Representative

Certificate of incorporation

Articles of association

Appointment Resolution

Proxy Statement

Other (*specify*):

##### Role:

##### Identification data

**Surname:**

**Name:**

**Tax Code (if any)<sup>4</sup>:**

**Date of Birth:**

**Country of Birth:**

##### Place of residence

**Address:**

**City:**

**Country:**

##### Place of domicile (if different from residence)

**Address:**

**City:**

**Country:**

<sup>4</sup> Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

## E. IDENTIFICATION OF THE BENEFICIAL OWNER

*“Beneficial owner” means any natural person(s) who ultimately owns or controls the Customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted. In this form, it is possible to indicate up to three beneficial owners. Replicate the following section to indicate additional beneficial owners, if the following sections should be replicated.*

**The criteria used to determine the beneficial ownership of the Customer must be specified from the following:**

1. Natural person who holds:
  - a) a shareholding of 25% plus one share or an ownership interest of more than 25% in the customer (*direct ownership*);
  - b) A shareholding of 25% plus one share or an ownership interest of more than 25% in the Customer, held through subsidiaries, trust companies or intermediaries (*indirect ownership*).
2. Natural person who ultimately controls the Customer through the control of an enough percentage of the voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means.

*In addition to the above, the ‘control through other means’ such as for example: close family relationships, historical or contractual relationships, constitutes a further case of control; using, enjoying or benefiting from the assets owned by the customer; responsibility for strategic decisions that fundamentally affect the business practices or general direction of a legal person; differentiated voting rights; the power to appoint the majority of the members of the board of directors or similar officers of the company, especially in cases where the appointment rights do not depend on the shareholding held; control through debt instruments, where a creditor or third party can control a legal entity or influence a shareholder based on the provisions of the loan agreement; control, shared or otherwise, through formal or informal agreements with owners, partners or companies; the use of formal or informal fiduciary appointment agreements.*

3. Natural person(s) who hold the position of senior managing official(s) if, after having exhausted all possible means, no person under points (1) and (2) is identified.
4. In the case of trusts, all the following persons:
  - a) the settlor(s);
  - b) the trustee(s);
  - c) the protector(s), if any;
  - d) the beneficiaries or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;
  - e) any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means.

**E.1 Identity details of the beneficial owner**

*Identification data*

**Surname:**

**Name:**

**Tax Code (if any)<sup>5</sup>:**

**Date of Birth:**

**Country of Birth:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

**Geographical area where the activity is mainly carried out:**

*Main source of income*

**Company employee:**

**Public employee:**

**On pension:**

**Other** Specify:

**Company manager:**

**Public Manager:**

**Unemployed:**

**Business man:**

**Self-Employed:**

**Recipient of other incomes:**

Indicate the sector:

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>6</sup>?**

YES

NO

*If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:*

**Criteria used to determine the beneficial ownership:**

1. a)            b)

2.  **Role held:**

*Control through other means:*

3.  **Role held:**

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a)        b)            c)            d)            e)

<sup>5</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>6</sup> Please, refer to the definition in the endnotes.



**If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information <sup>(7)</sup>**

**Work condition:**

Work activity:

Sector:

**Business relations in non-EU countries:**

NO  YES (specify the countries):

**Annual income capacity (after tax):**

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> up to € 100.000               | from € 100.000 to € 500.000 |
| <input type="checkbox"/> from € 500.000 to € 1.000.000 | over € 1.000.000            |

**Total personal assets (securities and real estate):**

- |   |                               |
|---|-------------------------------|
| <input type="checkbox"/> up to € 500.000                    | from € 500.000 to € 1.000.000 |
| <input type="checkbox"/> up from € 1.000.000 to € 5.000.000 | over € 5.000.000              |

Origin of the funds used in the relationship (where applicable):

<sup>7</sup> PEP acts as a public administration body when all the following conditions are simultaneously met: 1) the customer belongs to one of the following categories: i. public administration of the Italian Republic or a foreign country; ii. companies controlled, even indirectly, by a public administration of the Italian republic or of a foreign country; companies predominantly or wholly owned by the entities referred to in point i); 2) the beneficial owner of the customer coincides with the Natural person who holds the position of senior managing official; 3) the Beneficial Owner assumes the status of PEP exclusively as a member of the Customer's or of the Group Companies' Board of Directors or Auditors.

**E.2 Identity details of the beneficial owner**

*Identification data*

**Surname:** \_\_\_\_\_ **Name:** \_\_\_\_\_  
**Tax Code (if any)<sup>8</sup>:** \_\_\_\_\_ **Date of Birth:** \_\_\_\_\_  
**Country of Birth:** \_\_\_\_\_

*Place of residence*

**Address:** \_\_\_\_\_  
**City:** \_\_\_\_\_ **Country:** \_\_\_\_\_

*Place of domicile (if different from residence)*

**Address:** \_\_\_\_\_  
**City:** \_\_\_\_\_ **Country:** \_\_\_\_\_

**Geographical area where the activity is mainly carried out:**

*Main source of income*

**Company employee:** \_\_\_\_\_ **Public employee:** \_\_\_\_\_ **On pension:** \_\_\_\_\_ **Other** Specify: \_\_\_\_\_  
**Company manager:** \_\_\_\_\_ **Public Manager:** \_\_\_\_\_ **Unemployed:** \_\_\_\_\_  
**Business man:** \_\_\_\_\_ **Self-Employed:** \_\_\_\_\_ **Recipient of other incomes:** \_\_\_\_\_

Indicate the sector:

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>9</sup>?** YES NO

*If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:*

**Criteria used to determine the beneficial ownership:**

1. a) \_\_\_\_\_ b) \_\_\_\_\_

2.  **Role held:** \_\_\_\_\_

*Control through other means:* \_\_\_\_\_

3.  **Role held:** \_\_\_\_\_

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a) \_\_\_\_\_ b) \_\_\_\_\_ c) \_\_\_\_\_ d) \_\_\_\_\_ e) \_\_\_\_\_

<sup>8</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>9</sup> Please, refer to the definition in the endnotes.

**If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information <sup>(10)</sup>**

**Work condition:**

Work activity:

Sector:

**Business relations in non-EU countries:**

NO  YES (specify the countries):

**Annual income capacity (after tax):**

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> up to € 100.000               | from € 100.000 to € 500.000 |
| <input type="checkbox"/> from € 500.000 to € 1.000.000 | over € 1.000.000            |

**Total personal assets (securities and real estate):**

- |  |                               |
|--|-------------------------------|
| <input type="checkbox"/> up to € 500.000                 | from € 500.000 to € 1.000.000 |
| <input type="checkbox"/> from € 1.000.000 to € 5.000.000 | over € 5.000.000              |

Origin of the funds used in the relationship (where applicable):

<sup>10</sup> PEP acts as a public administration body when all the following conditions are simultaneously met: 1) the customer belongs to one of the following categories: i. public administration of the Italian Republic or a foreign country; ii. companies controlled, even indirectly, by a public administration of the Italian republic or of a foreign country; companies predominantly or wholly owned by the entities referred to in point i); 2) the beneficial owner of the customer coincides with the Natural person who holds the position of senior managing official; the Beneficial Owner assumes the status of PEP exclusively as a member of the Customer's or of the Group Companies' Board of Directors or Auditors.

**E.3 Identity details of the beneficial owner**

*Identification data*

**Surname:**

**Name:**

**Tax Code (if any)<sup>11</sup>:**

**Date of Birth:**

**Country of Birth:**

*Place of residence*

**Address:**

**City:**

**Country:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

**Geographical area where the activity is mainly carried out:**

*Main source of income*

**Company employee:**

**Public employee:**

**On pension:**

**Other Specify:**

**Company manager:**

**Public Manager:**

**Unemployed:**

**Business man:**

**Self-Employed:**

**Recipient of other incomes:**

Indicate the sector:

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>12</sup>? YES NO**

*If yes, please indicate the public role held and/or the relationship with the Politically Exposed Person and his/her role:*

**Criteria used to determine the beneficial ownership:**

1. a) b)

2.  **Role held:**

*Control through other means:*

3.  **Role held:**

Please indicate why it is impossible of identifying a beneficial owner on the basis of criteria 1 and 2 (ownership and control):

4. a) b) c) d) e)

<sup>11</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>12</sup> Please, refer to the definition in the endnotes.

**If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information <sup>(13)</sup>**

**Work condition:**

Work activity:

Sector:

**Business relations in non-EU countries:**

NO  YES (specify the countries):

**Annual income capacity (after tax):**

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> up to € 100.000               | from € 100.000 to € 500.000 |
| <input type="checkbox"/> from € 500.000 to € 1.000.000 | over € 1.000.000            |

**Total personal assets (securities and real estate):**

- |  |                               |
|--|-------------------------------|
| <input type="checkbox"/> up to € 500.000                 | from € 500.000 to € 1.000.000 |
| <input type="checkbox"/> from € 1.000.000 to € 5.000.000 | over € 5.000.000              |

Origin of the funds used in the relationship (where applicable):

<sup>13</sup> PEP acts as a public administration body when all the following conditions are simultaneously met: 1) the customer belongs to one of the following categories: i. public administration of the Italian Republic or a foreign country; ii. companies controlled, even indirectly, by a public administration of the Italian republic or of a foreign country; companies predominantly or wholly owned by the entities referred to in point i); 2) the beneficial owner of the customer coincides with the Natural person who holds the position of senior managing official; the Beneficial Owner assumes the status of PEP exclusively as a member of the Customer's or of the Group Companies' Board of Directors or Auditors.

## F. DECLARATION ON THE PURPOSE AND INTENDED NATURE OF THE BUSINESS RELATIONSHIP

### Intended nature

- Establishment of a financing relationship (loan)
- Request for a disbursement
- Other (*specify*):

### Purpose

#### Country of origin of the funds used in the relationship or operation:

- Italy
- Europe
- non-EU countries (*specify*):

#### Country of destination of the funds involved in the operation

- Italy
- Europe
- non-EU countries (*specify*):

#### Business relations in non-EU countries that exceed 10% of total revenues:

- NO  YES (*specify the Country*):

The Undersigned, as Executor on behalf of the Customer identified under section D, being aware of the criminal liability to which it may be subject pursuant to art. 55 of Legislative Decree no. 231/2007<sup>14</sup> in the event of an omission or false information, in compliance with provisions of art. 22 of said Decree, declares that the information provided herein is true and also declares to have provided any information of which he is aware, also in relation to the beneficial owner.

**Place and Date:**

**Signature of Declarant:**

#### Identification documents to be attached:

1. Only if the Form is not signed with a digital signature valid in Italy, copy of the executor's identification document
  2. Only if the executor is different from the legal representative, copy of the document from which the executor's power of act derives
  3. Representative diagram of the entire ownership structure aimed at identifying the beneficial owner declared.
- CDP reserves the right to request, if deemed necessary, a copy of the identification document of the Beneficial Owner or other documents.

<sup>14</sup> See the following related information notice

**Definition: “Politically Exposed Persons”**

Politically Exposed Persons shall mean:

Natural persons who holds or has ceased to be entrusted for less than a year with prominent public functions and the immediate family members and persons known to be close associates of such persons, identified based on the following criteria:

1. natural persons who are or have been entrusted with prominent public functions shall mean:
  - a) heads of Country, heads of government, ministers and undersecretaries, head and assessor of region, mayor of provincial capital or metropolitan city, mayor of municipality with a population of not less than 15,000 inhabitants and similar offices in foreign countries;
  - b) members of parliament, European parliamentarian, regional councilor and similar offices in foreign countries;
  - c) member of central decision-making bodies of political parties;
  - d) members of supreme courts, constitutional courts and other high-level judicial bodies, whose rulings are not generally subject to further appeal, barring exceptional circumstances;
  - e) members of Country audit offices and of the boards of directors of central banks;
  - f) ambassadors, chargés d'affaires or equivalent positions in foreign countries, high-ranking officials in the armed forces or similar offices in foreign countries;
  - g) members of the administrative, management or supervisory bodies of subsidiaries control, even indirectly, by the Country or by a foreign Country or participated, with a prevalent or totalitarian measure, by the Regions, by provincial capitals and metropolitan cities and by municipalities with a total population of no less than 15,000 inhabitants;
  - h) general manager of ASL or hospital, university hospital and other national health service organizations;
  - i) director, deputy director and member of the management body or entity carrying out equivalent functions in international organizations;
2. Close relatives shall mean: parents, spouses or person linked in civil union or cohabitation in fact or similar institutions to politically exposed children and their spouses as well as persons linked to the children in civil union or cohabitation in fact or similar institutions;
3. For the purposes of identifying the persons with whom the natural persons listed in paragraph 1 above are known to have close relationships, reference shall be made to:
  - a) any natural person who is known to have joint beneficial ownership of legal entities or any other close business relationship with a person referred to in paragraph 1;
  - b) any natural person who is the sole beneficial owner of legal entities or legal persons known to have been de facto established for the benefit of a person referred to in paragraph 1.

## INFORMATION ON THE CUSTOMERS' OBLIGATIONS PROVIDED FOR D. LGS. N. 231 OF 21 NOVEMBER 2007

### Article 22 "Obligations of the customer"

Customers shall provide in writing, on their own responsibility, all the necessary and updated information for the natural and legal persons subject to this decree to comply with the customer due diligence requirements.

### Article 55 paragraph 3 "Criminal sanctions"

Unless the act constitutes a more serious crime, anyone who is obliged, pursuant to this decree, to provide the data and information necessary for the identification due diligence, provides false data or information, shall be punished with from six months' to three years imprisonment and a fine of from €10,000 to €30,000.

## INFORMATION NOTICE FOR CUSTOMERS

### 1. Data Controller

Pursuant to the European Regulation 2016/679 (below GDPR), Cassa Depositi e Prestiti S.p.A. (below, CDP), with head office in Rome, via Goito n. 4 (00185), processes your personal data in its capacity as "Data Controller" in compliance with the provisions of law and informing you of the use of said personal data. The Personal Data Protection Officer can be contacted by writing to the email address [privacy@cdp.it](mailto:privacy@cdp.it).

### 2. Sources and type of data processed

The personal data held by CDP are collected directly from the customers or from third parties, for example Public Administrations, Public Registers, Chambers of Commerce, Databases of private companies. The data processed by CDP can include personal information (*first name, surname, date of birth, address, image, sex, marital status, tax identification no., etc.*) and contact information, as well as in specific cases the photo of the identification document (front/back), personal data present in the identification document used and photo of the face present in the video selfie procedure.

Furthermore, in complying with specific requirements relative to management of the business relationship (for example mandatory communications to the Authorities), and in the case of customer communications, CDP may process particular categories of data in accordance with art. 9 GDPR and data relating to criminal convictions and offences in accordance with art. 10 of the GDPR.

### 3. Purpose and legal basis of the data processing

The personal data are processed during the normal activity of CDP according to the following purposes: a) Purposes strictly connected with and instrumental to the establishment and management of relations with the customers pursuant to art. 6 paragraph 1 letter b) GDPR; b) purposes deriving from legal obligations, regulations, EU law, provisions issued by authorities authorized for the purpose by the law or by supervisory and control bodies pursuant to art. 6 paragraph 1 letter c) GDPR. Provision of personal data for the above purposes is necessary to finalize, carry out or continue the contract relationship with CDP.

### 4. Data processing method

In relation to the purposes specified, processing of the personal data is carried out by manual, IT and telematic instruments using logic appropriate for the purposes and, in any case, such as to guarantee the security and confidentiality of the data. Protection is ensured also in the presence of innovative instruments introduced by CDP.

Furthermore, it may happen that CDP uses specific identification techniques carried out through an automated technique based on the comparison between the image of the document you upload, and a video of your face recorded in real time. The verification activity is aimed at authenticating the documents and comparing the portrait of the face present on an identity document (e.g., identity card, passport, driving license, health card) with the image extracted from a video selfie taken directly by you.

### 5. Storage of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected in accordance with the principle of minimization pursuant to art. 5.1.c) GDPR.

### 6. Categories of subjects to whom the data can be communicated

For pursuit of the above purposes, CDP may communicate your personal data to third parties if said data communication operations are instrumental to the services requested and provided. Your data may furthermore be communicated to managers of private credit information systems. Further communications will be possible to guarantors, if relevant to the existing guarantee relationship. Your data may furthermore be communicated to companies forming part of the group, for administrative and accounting purposes, and to third parties in compliance with legal requirements. The subjects belonging to the above-mentioned categories perform the function of Data Supervisor or operate totally autonomously as distinct Data Controllers.

### 7. Transfer data outside the EU

CDP will carry out the processing in accordance with the procedures permitted by the current law, such as consent of the Data Subject, adoption of standard clauses approved by the European Commission, selection of subjects adhering to international programs for the free circulation of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

### 8. Rights of the Data Subject

You are informed that art. 15-22 GDPR entitle the Data Subjects to exercise specific rights. These rights can be exercised by request sent by post to Cassa depositi e prestiti S.p.A., via Goito, n. 4, 00185 Rome, att. Personal Data Protection Officer, or by email directly to said Officer, at the contacts provided in point 1. The Data Subject also has the right to raise complaints with the Italian Data Protection Authority.