

INFORMATION NOTICE ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The **Data Controller** is UniCredit S.p.A. with registered office at Piazza Gae Aulenti n. 3, Tower A, 20154 Milan (**the Bank or UniCredit**).

The **Data Protection Officer** can be contacted at UniCredit S.p.A., *Data Protection Office*, Piazza Gae Aulenti n. 3, Tower A, 20154 Milan, E-mail: Group.DPO@unicredit.eu, PEC: Group.DPO@pec.unicredit.eu.

2. PURPOSE AND LEGAL BASIS OF THE PROCESSING

UniCredit processes personal data for the following purposes:

- A.** to your request to **participate in** the Start Lab 2027 initiative. This necessity represents the legal basis that legitimizes the consequent processing, pursuant to and for the purposes of Article 6, paragraph 1, letter b) of the GDPR. The provision of the data necessary for these purposes is a necessary requirement to respond to your request and, in the absence of them, the Bank may be unable to manage and follow up on your request
- B.** **comply with legal obligations.** This necessity represents the legal basis that legitimizes the consequent processing, pursuant to and for the purposes of Article 6, paragraph 1, letter c) of the GDPR. The provision of data necessary for these purposes is a legal obligation; in the absence of them, the Bank would be unable to fulfil the services provided for by the Regulations (available in the Regulations section of the unicreditstartlab.eu Website).

3. CATEGORIES OF DATA PROCESSED

UniCredit processes personal data collected directly from you, or from third parties, which include, for example, **personal data** (e.g. name, surname, address, date and place of birth), **information contained in your CV**, **image data** (e.g. photo on identity card).

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The data may be communicated to third parties who are part of the UniCredit Group or not.

These recipients process the personal data as independent controllers or processors. The categories of independent data controllers and the list of data processors, to whom the data may be communicated, can be consulted in the "Privacy" section of the www.unicredit.it website.

Your Personal Data may be processed by the following categories of subjects authorized to process personal data, with reference to the data necessary for the performance of the tasks assigned to them and in accordance with the instructions given by UniCredit itself: employees of UniCredit or seconded by it; fixed-term employees, interns, collaborators, consultants and employees of external companies.

We specify that as part of the UniCredit Start Lab 2027 project, data can be communicated to the Bank's partners involved. These subjects will act as independent data controllers.

5. RIGHTS OF THE DATA SUBJECTS

EU Regulation 679/2016 gives natural persons, sole proprietorships and/or freelancers ("Data Subjects") specific rights, including the right to know which Personal Data are in the possession of the Bank and how they are used (Right of access), to obtain their updating, correction or, if there is interest, integration, as well as cancellation, transformation into anonymous form or limitation. Each Data Subject may also request to receive or request the transfer of Personal Data relating to him or her in the possession of the Bank, for further personal use or to provide them to another data controller (**Right to portability**).

6. DATA RETENTION PERIOD AND RIGHT TO ERASURE (i.e. RIGHT TO BE FORGOTTEN)

UniCredit processes and stores your personal data for the entire duration of the contractual relationship, for the execution of the obligations inherent and consequent to it, for compliance with applicable legal and regulatory obligations, as well as for its own or third parties' defense purposes and until the expiry of the applicable legal limitation period, starting from the date of termination of the contractual relationship.

At the end of the applicable retention period, the personal data relating to the **Data Subjects** will be **deleted** or **stored in a form that does not allow** the identification of the Data Subject (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** started before the expiry 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 **the Italian and/or foreign public authorities** received/notified to the Bank before the expiry of the retention period.

7. METHODS OF EXERCISING RIGHTS

To exercise the rights referred to in paragraph 5, each Data Subject may contact: UniCredit S.p.A., *Claims*, Via Del Lavoro n. 42, 40127 Bologna, fax +39 051.6407229, e-mail address: diritti.privacy@unicredit.eu.

The deadline for replying is **one (1) month**, which may be extended by **two (2) months** in cases of particular complexity; in these cases, the Bank shall provide at least one interim communication within **one (1) month**.

The exercise of rights is, in principle, free of charge; the Bank reserves the right to request a contribution in the event of manifestly unfounded or excessive requests (even repetitive).

The Bank has the right to request information necessary for the identification of the applicant.

8. COMPLAINT OR REPORT TO THE GUARANTOR FOR THE PROTECTION OF PERSONAL DATA

The Bank informs you that you have the right to lodge a complaint or make a report to *the Guarantor for the Protection of Personal Data* or alternatively to appeal to the Judicial Authority. The contacts of *the Guarantor for the Protection of Personal Data* can be consulted on the <http://www.garanteprivacy.it> website.