

INFORMATION STATEMENT – pursuant to Article 13 of legislative decree 196/2003

On 1 January 2004 legislative decree No. 196 of 30 June 2003 entered into force – Data Protection Code (hereafter the “Code”) - which replaced law No. 675 of 31 December 1996 and many statutory and regulatory provisions.

The Code guarantees that the processing of personal information shall occur in a manner that respects fundamental rights and freedoms, as well as the dignity of the interested party, with particular reference to confidentiality, personal identity and right to protection of personal information.

Pursuant to Article 13 of the law, we hereby inform you that your personal information, collected both prior to the creation of the contractual relationship as well as during the course of the same, (together, the “personal information”), shall be processed pursuant to Article 4(1)(a) (the “Processing”) of the Code, under the terms of the legislation cited above and in accordance with the obligations of confidentiality that guide our company's operations. We wish in particular to inform you of the following:

Purposes and conditions of treatment.

The collection and processing of the information relating to the interested party shall be performed in order to enable this Company to carry out the following activities:

- Compliance with statutory, fiscal or accounting requirements;
- Client management;
- Financial services;
- internal control services;
- Litigation management, where applicable;
- Statistical analysis (other than marketing).

The persons responsible for the services may explain, on request, under which of these categories the information which may be requested or which is already in our possession falls.

The processing of the information for these purposes shall occur both electronically and manually, according to logical criteria that are compatible with and useful for the purposes for which the information is collected, in accordance with the rules governing confidentiality and security provided for by law and our internal regulations. In particular, the information shall be processed through comparison, classification and calculation, as well as the production of lists.

Some information will also be processed on behalf of the company by third party companies, bodies or professionals which, in their capacity as Data Controllers, carry out specific processing services or complementary activities to our own, such as IT service companies, companies which provide payment services, outsourcing companies, consultants and self-employed professionals, all in accordance with statutory provisions on data security.

Where required under statutory or regulatory obligations, the information will be transmitted to oversight bodies or organs (for example, the Bank of Italy for the management of the Italian Central Credit Register [*Centrale Rischi*], to SIA-SSB for the management of the central register for credits of a low amount, and to the Italian Foreign Exchange Office in compliance with the obligations imposed by anti money laundering legislation). In accordance with the regulations of the Antitrust Authority (measure of 10/9/09), in the event that certain operations which concern the interested party are considered to be suspicious pursuant to Article 41(1) of legislative decree No. 231 of 21 November 2007, the relative information – including the personal information – shall be communicated to other financial intermediaries from the UBI Banca Group, to which UBI Factor belongs.

The information relating to the interested party is, or has been, provided to the Company by the interested party himself or by other subjects. The information may be collected also from third parties, in which case we shall ensure that you are promptly notified, as required pursuant to Article 13(4) of the Code.

Compulsory of optional nature of the data communication.

The disclosure of information to our Company is compulsory only for the information required under the terms of a legal obligation (namely if required by law, regulation, measure of a public authority, etc.) or is necessary in order to perform the contract. In all other cases, the interested party is free to decide whether to disclose his information.

Consequences of refusal to provide information.

Where there is a statutory or contractual obligation to disclose information, the refusal by the interested party to provide the information may result in the violation by the interested party of the provisions which establish that obligation (with possible consequences for the interested party) or a breach of contract by the interested party (which may give rise to the contractual or statutory remedies regulating breaches of contract). In any case, the Company may not carry out operations which are premised on the processing of the information concerned.

Where the interested party is free to decide whether to disclose the information, any refusal to provide it will not result in statutory violations or breaches of contract (with the relative consequences set out above).

However, when the information is necessary or strictly instrumental for the implementation of the contractual relationship, the refusal to disclose it or the failure to consent to its processing (where consent is necessary by law) may mean that it is impossible to carry out the operations connected with that information (or in any case may cause delays in the performance of those operations).

The eventual refusal to disclose information useful for our activities other than that necessary or strictly instrumental for the performance of the contractual relationship may prevent the prosecution of those further activities but will not interfere with the prosecution of the contractual relationship. The information will not be distributed in any manner. The information will not be transferred abroad in any manner.

The rights of the interested party.

Article 7 of the Code grants the interested party numerous rights which we invite you to consider carefully. Amongst these, we remind you of the rights to:

1. obtain confirmation as to whether or not personal information exists that concerns you, even if it has not yet been registered, and to be notified of it in intelligible form;
2. obtain an indication:
 - a) of the origin of the personal information,
 - b) of the purposes of and procedure for processing,
 - c) of the logic applied for processing carried out with the assistance of electronic instruments,
 - d) of the details of the Data Controller, the Managers and the designated representative,
 - e) of the individuals and categories of individual to whom the personal information may be communicated or who may become aware of it in their capacity as designated representative within the territory of the State, or as managers or persons responsible for the service;
3. obtain:
 - a) the updating, rectification or, where applicable, the supplementation of information,
 - b) the cancellation, transformation into anonymous form or block on information processed in breach of the law, including that which it is not necessary to store in relation to purposes for which the information was collected or subsequently processed,
 - c) the attestation that the operations specified under letters a) and b) have been notified, including as regards their contents, to those to whom the information was disclosed or distributed, other than in cases in which compliance proves to be impossible or entails the use of means that are manifestly disproportionate compared to the right protected;
4. oppose:
 - a) on legitimate grounds the processing of personal information which concerns you, even if it is pertinent to the purposes for which it was collected,
 - b) the processing of personal information which concerns you for the purposes of the dispatch of promotional or direct sales material or for the conduct of market research or business communications.

You may exercise these rights or request the list of designated managers by writing to UBI Factor S.p.A., Privacy Manager:

- Milan Headquarters, Via Fratelli Gabba, 1, 20121 Milan (MI);
- Pordenone Business Unit, Via Giardini Cattaneo, 4 Pordenone (PN).

Information relating to the Data Controller and the manager

The data controller is UBI Factor S.p.A. with registered offices in Via Fratelli Gabba, 1, 20121 Milan; the managers responsible for the processing are:

- for the Milan Headquarters, the manager *pro tempore* of Legal and Company Affairs, with address for this purpose with the registered office of the Company;
- for the Pordenone Business Unit, the manager *pro tempore* of the business unit, whose address for this purpose is that of the business unit.

UBI Factor S.p.A.