INFORMATION TO BE PROVIDED UNDER ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION (EU REGULATION NO. 679/2016)

Following the entry into force of the EU Regulation no. 679/2016 (GDPR), Société Générale Factoring S.A. – Italian Branch, as "Controller" of the data processing is obliged to provide certain information regarding the use of personal data.

IDENTITY AND CONTACT DETAILS OF THE DATA PROCESSING CONTROLLER

"Controller" of the processing is Société Générale Factoring S.A. – Italian Branch, with registered office in Milan – Via Olona n. 2 and registered with the Company's Register of Milan, under no. 1264395, Tax Code and VAT number 09047470159, ph. 02 467751, fax 02 46776003, Certified E-mail sgfactoring@legalmail.it (the "**Company**")

CONTACTS OF THE DATA PROTECTION OFFICER

The contact details of the Data Protection Officer are the following:

SOCIÉTÉ GÉNÉRALE FACTORING S.A. – Italian Branch - c.a. Data Protection Officer Via Olona n. 2 - 20123 Milano

Tel: 02 4654681

e-mail: dpo@sgfactoring.com

NATURE OF THE PROCESSED PERSONAL DATA

In order to correctly carry out the activities necessary to the management of the financial relationship with you, as a customer or potential customer, the Company will process your so-called common personal data (e.g. name, surname, tax code, date of birth, etc.), particular data[1] and judicial data[2], (data to be acquired, some of which need to be provided by you or by third parties under the law, and/or data already provided by you or by third parties, also by consulting databases) in the context of the purposes described below.

PURPOSES AND LEGAL BASIS OF THE DATA PROCESSING

Your personal data will be processed, in compliance with the abovementioned regulation and in the context of the Company's usual activity, for the following purposes:

- Purposes strictly connected and instrumental to the management and carrying out of the contractual relationship, including the pre-contractual phase, as well as the execution of obligations, in primis information obligations, under the law, regulations, EU regulations and competent authorities, for purposes connected to possible credit information centres managed by trade associations (e.g. Assifact) or by specialized companies (e.g. CRIF and EXPERIAN);
- Purposes connected to the communication of data between the various companies belonging to the Group and the parent company Société Generale S.A.;
- Purposes connected to commercial information and updating on new products or services offered by the Company and/or other companies belonging to the Group.

In light of the above, the legal basis of the data processing is:

- as to the purposes sub A) above, the performance of the agreement entered into by and between the Company or in connection with pre-contractual measures adopted upon request of the data subject and for such purposes the consent is not required;
- as to the purposes sub B) above, the legitimate interest of the Controller in compliance with the client's data processing and fraud prevention;
- as to the purposes sub C) above, the optional consent of the data subject.

With reference to the purposes sub C), we hereby inform you that you are entitled to revoke your consent at any time, without any prejudice to the lawfulness of the data processing based on the consent given prior to such revocation.

PERSONAL DATA DISCLOSURE

The disclosure of your personal data with reference to items A) and B) is an essential requirement for the execution of the agreement, as well as a legal obligation. **The lack of disclosure of the above data will prevent the establishment of contractual relationships with the Company.**

The disclosure of your personal data with reference to item C) is optional. **The lack of disclosure of such data will not prevent the establishment of contractual relationships with the Company.**

PERSONAL DATA SOURCES

The personal data held by the Company are collected either directly from the clients or from third parties, against the services directly rendered by the Company or by proxy by third parties, or in case of data acquired from external companies in order to obtain commercial information, market surveys, direct offers of products or services. With reference to this last type of data, the Company shall avail itself solely of suppliers contractually bound for the supply of personal data legitimately and transparently collected. In any case all personal data shall be processed in compliance with the applicable regulations and with the confidentiality obligations the activity of the Company always refers to.

CATEGORIES OF SUBJECTS TO WHOM THE DATA CAN BE DISCLOSED

Exclusively for the purposes mentioned in this information note, personal data can also be disclosed abroad, but within the EU, to the following categories and subjects:

- Public authorities, administrations and entities, to fulfil legal obligations;
- Controlling, controlled and affiliate companies belonging to the Société Generale Group;
- Commercial network;
- Third parties carrying out specific tasks in collaboration with our Company (e.g. professionals, consultants, auditing firm or auditors certifying our company's accounts, financial institutions and banks, insurance and debt collection companies, law firms, trade associations (e.g. Assifact), technical assistance companies, shipping companies, companies providing services to acquire commercial and financial information, fraud prevention and debt collection, identification of financial risks).

Some external companies (e.g. CRIF SpA, Experian SpA) may process the data collected as mentioned above on a permanent basis and, therefore, beyond the operative phase related to the disclosure of such data. Such companies, an updated list of which is available upon request to the Data Protection Officer, will process personal data, for the above purposes, as independent data controllers.

DATA PROCESSING METHODS

[1] Within this category fall personal data which disclose ethnic or racial origins, political opinions, religious or philosophical beliefs, or trade-union membership, as well as genetic data, biometric data aiming at unequivocally identifying a natural person, data concerning health, sexual life or sexual orientation of such person.

[2] Within this category fall all personal data concerning criminal convictions and offences or the relevant security measures.

The processing of your personal data will be carried out as follows:

- Data collection;
- Registration, for storage purposes in paper and electronic archives;
- Organisation and processing of the personal data contained in the electronic archives. Such activity also includes the use of selection, extraction and comparison of personal data instruments;
- Disclosure to other third parties designated by us.

Therefore, the processing methods of your personal data will be carried out through manual, IT and electronic instruments in order to memorise, manage and transmit data, to connect personal data belonging to other subjects, based on qualitative, quantitative and time criteria, repeated or definable from time to time.

The confidentiality of the data is guaranteed by means of appropriate technical and organisational measures, so to minimize the risks connected to destruction, loss, amendment, unauthorised disclosure or accidental or illegal access to transmitted, archived or otherwise processed personal data.

DURATION OF DATA STORAGE

All data shall be stored for the time necessary to the management of the contractual relationship, it being understood that following 11 years from the termination of the relationship with the client, the relevant data shall be deleted, except for the cases set forth by law providing for or allowing a further storage of such data.

As to commercial information activities, in case of the client's optional consent, collected data shall be stored for the time necessary to the relevant marketing purposes (and, in any case, for no longer than 12 months of the termination of the relationship).

DIRITTI DELL'INTERESSATO

We hereby inform you that you have the following rights regarding your personal data:

- **Right to access:** you are entitled to obtain confirmation from the data protection controller that your personal data are currently being processed and, in such a case, to access your personal data and in particular the information mentioned under article 15 of the General Data Protection Regulation;
- **Right to rectify:** you are entitled to obtain from the data protection controller the rectification of your inexact data, without unjustified delay, as well as the integration of incomplete personal data, also by means of an integrative statement;
- **Right to deletion:** you are entitled to obtain from the data protection controller the deletion of your personal data, without unjustified delay, should the requirements under article 17 of the General Data Protection Regulation be met;
- **Right to limited processing:** you are entitled to obtain from the data protection controller the limited processing of your personal data, should one of the conditions under article 18 of the General Data Protection Regulation be met;
- **Right to data portability:** you are entitled to receive, in a structured format of common use and readable by an automatic device, the personal data you have disclosed to a data protection controller, as well as the right to transmit them to another data protection controller, without any impediment caused by the data protection controller, should the requirements mentioned under article 20 of the General Data Protection Regulation be met;
- **Right to oppose:** you are entitled to oppose at any moment, for reasons related to your particular situation, the processing of your personal data, in the cases and with the modalities set forth by article 21 of the General Data Protection Regulation;
- **Right not to be subject to a decision based uniquely on an automatized processing,** including profiling, giving rise to legal effects regarding you or having analogous material effects on your person, pursuant to article 22 of the General Data Protection Regulation.

As to the exercise of the aforementioned rights, please contact the Controller at the following e-mail address: privacy@sgfactoring.com. An appropriate feedback will be provided to you according to the timing under GDPR.

RIGHTS TO FILE A CLAIM WITH A SUPERVISING AUTHORITY

You are entitled to file a claim with a Supervising Authority competent in your country or with any Supervising Authority within the European Union.

Milan, _____

Société Générale Factoring S.A. – Italian Branch

PLEASE RETURN TO SOCIÉTÉ GÉNÉRALE FACTORING S.A. – ITALIAN BRANCH TOGETHER WITH A COPY OF YOUR ID AND TAX CODE NUMBER

CONSENT

PURSUANT TO THE GENERAL DATA PROTECTION REGULATION (REGULATION EU 679/2016)

The undersigned

domiciled for office purposes as follows, on my own behalf and in my quality as

of the company xxxxxxxxx registered with the companies' Register under of under no.

WHEREAS

SG Factoring S.p.A. (the "**Company**") under article 13 of the General Data Protection Regulation, has informed me about:

a) the identity and the contact details of the data protection controller;

b) the contact details of the Data Protection Officer;

c) the purposes of the processing of personal data, as well as the legal basis of the processing;

d) the legitimate interests pursued by the data protection controller or by third parties;

e) possible recipients or categories of recipients of personal data;

f) the purposes and methods of the processing of personal data;

g) the mandatory or optional nature of the supply of data;

h) the consequences of a possible refusal to answer;

i) the subjects or categories of subjects to which personal data can be disclosed, or who can have knowledge the same as data processor or other authorized subjects, and the scope of the disclosure of personal data;

j) duration of the storage of personal data;

k) the right of the data subject to ask the data protection controller to access its personal data and their rectification or deletion or a limitation of their processing or to oppose to their processing, as well as the right to data portability;

l) the right of the data subject to revoke its consent at any time, without any prejudice to the lawfulness of the processing based on the consent given prior to the revocation;

m) the right of the data subject to file a claim with a supervising authority;

n) whether the communication of personal data, either legally or contractually, is mandatory or a requirement necessary to the execution of an agreement, and whether the data subject is obliged to provide personal data, as well as the possible consequences of the lack of disclosure of such data.

NOW AND THEREFORE,

It is not necessary to give my consent to the disclosure of my personal data and the data of the company represented by me, also outside the national territory, but within the European Union, to the subjects mentioned in the information note, for the purposes under A) and B), since they are strictly connected to the management of the contractual relationship with the Company, as well as for the purpose of executing certain obligations, in primis information obligations, for various reasons required by law, regulations, EU regulations, by competent authorities and to pursue the legitimate interest of the data protection controller, due to its belonging to the Société Generale Group (the "Group"). Should I decide not to provide the requested personal data, the Company would be unable to establish and perform the contractual relationship.

[ ] I give my consent **[ ] I deny my consent**

to the processing and disclosure of my personal data and the data of the company represented by me, also abroad, but within the European Union, to the subjects listed in the information note under the whereas, for the purposes of commercial information and update on new products and services offered by the Company and/or other companies belonging to the Group, for market surveys, as explained in the information note sub C).

DATE _____ SIGNATURE _____