

# PRIVACY NOTICE FOR OUR SHAREHOLDERS



## Assicurazioni Generali processes your personal data\*

Assicurazioni Generali S.p.A. (hereinafter also the Company), with registered office in Trieste, at Piazza Duca Degli Abruzzi no. 2, processes your personal data as **Data Controller\***.

If you wish to receive more information, you can use the following postal address:



Assicurazioni Generali S.p.A., Piazza Duca degli Abruzzi no. 2, 34132 Trieste / P.O. Box 538

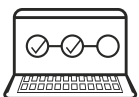
For any questions or if you wish to exercise a right in respect of the processing of your personal data, you can contact our **Data Protection Officer\***:



**By email at:**  
dpoag@generali.com



**By traditional mail at:**  
Assicurazioni Generali, Piazza Tre Torri n. 1, 20145 Milan to the attention of the Data Protection Officer.



## How we use your personal data and on the basis of which ground

We process your personal data in order to manage your relationship as shareholders with the Company, with particular respect to the following activities:

- 1** Management, also for administrative purposes, of the relationship deriving from the purchase and/or the underwriting of the Company's shares;
- 2** Fulfillment of the obligations set forth by national and EU laws and regulations, or provided for by any supervisory and control Authorities and/or bodies.
- 3** Sending of newsletters, allowing and management of invitations to our events, including the sending of the relevant communications, any gifts and/or gadgets, if any, as well as of all the documentation related to the Shareholders' Meeting.

The processing of your personal data for the purposes indicated under **points (1) and (2)** above is necessary to allow the Company to comply with the obligations to which it is subject. Processing of your personal for the purposes indicated under the previous **point (3)** is based on the Company's legitimate interest, to the extent that this is strictly necessary to pursue this legitimate interest and based on a proper balancing with your fundamental rights and freedoms.



## Why the provision of your personal data is required

For managing our relationship, the communication of your personal data is required since it is necessary to comply with legal obligations to which the Company is subject. Therefore, the failure in the communication or the partial or inaccurate communication may have, as consequence, the impossibility to carry out the activities required by applicable laws and prevent the Company from complying with the applicable law requirements. For the achievement of the purpose above indicated in the paragraph (iii), the communication of your personal data is optional. Therefore, the failure in the communication or the partial or inaccurate communication may have, as a consequence, the impossibility of being updated as well as to participate in our initiatives.



## Which personal data we use

We process only the personal data **strictly necessary** to achieve the purposes above indicated. We mainly process

- Biographical and identification data;
- Contact data;
- Information relating to the owned shares and any restrictions on them;
- Special categories of personal data, if necessary to the participate the Shareholders Meeting.

Personal data can be provided directly by you or collected by public sources (lists, records, public documents known by anyone), as well as collected from third parties (including, for example, banks, credit institutions, etc.).

in addition to any other personal data provided by you, if any.



## With whom we share your personal data

The members of our corporate bodies as well as our staff process your personal data with modalities and procedures, also in electronic form, adequate to ensure an adequate level of security.

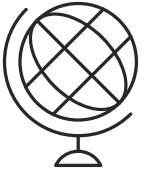
Your personal data can be shared only with **third parties** which have been assigned with the task to perform some activities concerning the management of the relationship with the Company. Depending on the activity performed, such third parties may act as **Data Processors\***, **Joint Controllers\*** or autonomous **Data Controllers\***.

Third parties cooperating with us can perform computer, telematics, financial, administrative, filing, printing of the ....

\*For more information, see the glossary on page 6.

Both our staff and third parties which process your personal data for the purposes above indicated – exception for autonomous Data Controllers – receive proper instructions about the correct modalities of the processing. Your personal can be disseminated in order to comply with law requirements.

... correspondence, management of incoming and outgoing correspondence and financial auditing activities. Third parties also include companies belonging to Generali Group, where the disclosure is necessary to achieve the purposes above described.



## Where we transfer your personal data

As a general rule, we do not transfer your personal data in Countries outside the European Economic Area.

In exceptional cases, limitedly for the purposes indicated above, we may transfer your personal data to a third party above described or to a public body requesting it, also in Countries outside the European Economic Area.

In any case, the transfer of Your personal data is performed in compliance with the applicable laws and international agreements in force, as well as on the basis of appropriate and suitable safeguards (such as, for example, transfer to a Country ensuring an adequate level of protection or adopting the standard contractual clauses approved by the EU Commission).



## The rights you can exercise in respect of the processing of your personal data

You can exercise the following rights in respect to your personal data:

### Access

You may request access to your personal data to receive information, for example, about the categories of personal data that the Company is currently processing.

### Rectify

You may ask the Company to correct personal data that are inaccurate or incomplete.

### Erase

You may ask the Company to erase personal data where one of the following grounds applies:

- ◉ Where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- ⦿ You withdraw **consent\*** on which the processing is based and where there is no other legal ground for the processing;
- ⦿ The personal data have been unlawfully processed;
- ⦿ The personal data have to be erased for compliance with legal obligation in Union or Member State law to which the Company is subject;
- ⦿ The personal data have been collected in relation to the offer of information society services.

## Restrict

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You may ask the Company to restrict how it processes your personal data, requesting only their storage, where one of the following applies:

- ⦿ You contest the accuracy of your personal data, for a period enabling the Company to verify the accuracy of your personal data;
- ⦿ The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- ⦿ The Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
- ⦿ You have objected to processing pursuant to the right to object and automated decision-making, pending the verification whether the legitimate grounds for the Company override yours.

## Portability

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You may ask the Company to transfer the personal data you have provided us to another organisation and / or ask to receive your personal data in a structured, commonly used and machine readable format.

In case you provided your consent to the processing of personal data, you may withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If your personal data are transferred outside the European Economic Area, you have the right to obtain copy of such data as well as indication of the Country/Countries where the personal data have been made available.

You can exercise your rights by contacting our Data Protection Officer at the contact details above indicated. The request of exercise of rights is free of charge, unless the request is manifestly unfounded or excessive



## Your right to lodge a complaint to the Supervisory Authority

In case you consider that the processing of your personal data infringes the applicable privacy laws, you have the right to lodge a complaint to the Italian Personal Data Protection Authority – **Garante per la Protezione dei Dati Personali\*** with the modalities indicated on the Authority's website ([www.garanteprivacy.it](http://www.garanteprivacy.it)).



[www.garanteprivacy.it](http://www.garanteprivacy.it)



## How long we retain your personal data

Your personal data can be retained for the whole duration of your relationship with the Company. Furthermore, we can store your personal data also after this term if required by applicable laws as well as needed for the resolution of disputes or to respond to any request formulated by the judicial authority or the Supervisory Authority.

### Changes and updates of the privacy notice

Also considering possible amendments of the applicable privacy laws, the Company may integrate and/or update, wholly or partially, this privacy notice. Any changes, integrations or updates will be communicated through publication on the Company's website [www.generali.com](http://www.generali.com).



# Glossary

To help you understanding our privacy notice, please find below the meaning of the main terms contained therein:

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, whether or not by automated means.

**Personal data** mean any information relating, directly or indirectly, to a person (such as, for example, name, an identification number, location data, an online identifier, one or more elements able to identify the physical, physiological, genetic, mental, economic, cultural or social identity, etc.).

**Special categories of data** mean the personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership as well as genetic data, biometric data where they uniquely identify a person, data concerning health or data concerning a person's sex life or sexual orientation.

**Genetic data** mean the personal data relating to the inherited or acquired genetic characteristics of a person which give unique information about the physiology or the health of said person and which result, in particular, from the analysis of a biological sample from the person in question.

**Biometric data** mean the personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a person, which allow or confirm the unique identification of that person, such as facial images or dactyloscopic data.

**Data concerning health** mean the personal data related to the physical or mental health of a person, including the provision of health care services, which reveal information about his or her health status.

**Judicial data** mean the personal data related to criminal convictions and offences or to the connected security measures afflicted to a person.

**Data subject** means the person whose personal data are processed.

**Data controller** means the individual or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (for example, the employer is the data controller in respect of its employees' personal data since, with reference to the employment relationship, it decides the purposes and means of such processing).

**Joint controller** means the individual or legal person, public authority, agency or other body which, jointly with other data controllers, determines the purposes and means of the processing of personal data.

**Data Processor** means the individual or legal person, public authority, agency or other body which processes personal data on behalf of the data controller (for example, the company which provides the service of employees' salaries calculation may be considered a data processor since it processes personal data on behalf of another company, the employer).

**Consent** means any data subject's wish, by a statement or by a clear affirmative action, which signifies agreement to the processing of personal data relating to him or her. For the consent to be valid, the data subject's wish needs to be freely given, specific for each processing operation, collected upon the provision of a privacy notice and clearly distinguishable from any other declarations.

**Personal data breach** means a breach of security (physical or IT) leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**Data Protection Officer** means a person in charge for performing support activities for the company functions and control activities in respect of the processing of personal data. It is also in charge for cooperating with the Supervisory Authority and it represents the contact point, also for the data subjects, for any matters connected with the processing of personal data.

**Garante per la Protezione dei Dati Personali** is the Italian Supervisory Authority for the protection of personal data.