

SUPPLEMENTARY INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATING TO THE SIGNING OF ELECTRONIC DOCUMENTS WITH A GRAPHOMETRIC SIGNATURE

Pursuant to Articles 13 and 14 of European Union Regulation 2016/679 of the European Parliament and Council of 27 April 2016 and the Irish and Italian regulations which empower Intesa Sanpaolo Life dac, part of the Intesa Sanpaolo Group (hereafter “**Company**”) as Data Controller, in its capacity the ‘Interested Party’, you are hereby notified about the use of your personal data (hereafter “**Personal Data**”) with specific reference to the signing of IT documents with a graphometric signature.

Categories of Personal Data, purposes and legal basis of processing

The personal data contained in the computer registration of the parameters of the signature affixed by the interested party (for example: speed, pressure, inclination) are collected for the following purposes:

- a) requirements for comparison and verification in relation to any litigation situations related to the disregarding of the IT signature affixed to the documents relating to the contract;
- b) counteracting of attempts at fraud and the phenomenon of identity theft;
- c) strengthening the guarantees of authenticity and integrity of the IT documents signed; and
- d) dematerialisation and security of stored documents with consequent elimination of the use of the card.

Procedures for dealing with personal data

The main characteristics of the treatment are shown below.

- a) Deleting raw biometric data and biometric samples takes place immediately after completing the application process and no biometric data are kept other than on the signed electronic document.
- b) Biometric data are not stored, even for limited periods, on the hardware devices used for collection and are stored in the computerised documents underwritten in encrypted format through appropriate public-key cryptosystems.
- c) The matching private key is in the exclusive hands of a Third-Party Trustee who provides suitable guarantees of independence and security in storing the key. The Company cannot in any way access and use the private key without the intervention of the Third-Party Trustee subject.
- d) The generation of private keys to decrypt biometric vectors, and their storage, takes place inside secure devices (*Hardware Security Model*) located at the IT sites (*Server Farm*) of the Intesa Sanpaolo Group. Any activity of use of the keys provides for the typing of specific unlocking credentials, maintained for the exclusive availability of the Third-Party Trustee.
- e) The credentials for the release of the keys have been handed over to the Third-Party Trustee, who takes care of the storage on the Intesa Sanpaolo Group's premises and the highest security protected devices to which the Third-Party Trustee has exclusive possibility of access.



- f) The Third-Party Trustee can be contacted to insert his own credentials to unlock the private decryption key, after having recovered them from the protected devices of the Intesa Sanpaolo Group to which he has exclusive access, for the management of litigation situations and verification of the signature by a handwriting expert and for the management of extraordinary maintenance activities of the service.
- g) Access to the encrypted graphometric model takes place exclusively through the use of the credentials to unlock the private key, held by the Third-Party Trustee only when it is indispensable at the onset of a dispute on the authenticity of the signature or following a request by the Judicial Authority.
- h) The transmission of biometric data in the information system of the Intesa Sanpaolo Group takes place exclusively through the use of appropriate cryptographic techniques.
- i) The information systems of the Intesa Sanpaolo Group are protected against the action of any type of cyber-attack with the most up-to-date security systems, certified according to the international standard ISO/IEC 27001:2013 by a Third-Party Agency.

So as to achieve the aforementioned purposes, the documents are stored pursuant Ministerial Decree of 3 December 2013 at the Intesa Sanpaolo Group, which uses the Intesa Sanpaolo Group Consortium Company to execute the service, and of IT companies specialised in the storage service in accordance with the updated list which is available at all branches of the Intesa Sanpaolo Group Bank or on the www.intesasanpaololife.ie website.

The processing of biometric data as part of the use of the graphometric signature also takes place and, as applicable, on the basis of the requirements of the Guaranteeing Authority for the protection of personal data (General Prescriptive Provision in the Matter of Biometrics - 12 November 2014 - Published in the Official Gazette number 95 of 3 December 2014).

The consent to the processing of biometric data by the Company in the context of the use of the graphometric signature is expressed by the Interested Party at the time of signing up to the service of graphometric signature, carried out at one of the Intesa Sanpaolo Group Bank branches, with the acceptance of the use of the same and is valid until your future revocation of it.

As an interested party, you can exercise, at any time, with regards to the Data Controller the rights provided by the Regulations listed below, by sending an appropriate request by e-mail to dpo@intesasanpaololife.ie or to the certified e-mail address privacy.intesasanpaololife@pec.it or by ordinary post to Intesa Sanpaolo Life dac, 1st Floor, International House, 3 Harbourmaster Place, IFSC, Dublin D01 K8F1, Ireland.

For any other matter not covered above, please refer to the main information provided by the Company.