



INFORMATION ON THE PROCESSING OF PERSONAL DATA

CANDIDATES

CA Auto Bank S.p.A. (hereinafter the “**Data Controller**” and/or “**CA Auto Bank**”), with registered office at Corso Orbassano 367, Turin, registered in the Register of Banks No. 5764, Tax Code and VAT No. 08349560014, is the Data Controller of your personal data.

As part of its institutional purposes, and in compliance with EU Directive 2019/1937—implemented in Italy by Legislative Decree No. 24 of March 10, 2023—and in accordance with applicable personal data protection laws, CA Auto Bank provides the following information regarding the processing of personal data related to reports submitted through the Whistleblowing Portal (hereinafter the “Whistleblower Portal” or the “Portal”). The Portal is accessible via a dedicated section (“Whistleblowing”) on the CA Auto Bank website, pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”), as well as other applicable European and national amending or supplementing legislation on personal data protection (the “Applicable Privacy Legislation”), including the Italian Privacy Code (Legislative Decree No. 196/2003), as amended by Legislative Decree No. 101/2018. For further details, please check the privacy policy available at the following link: [insert link].

Please be advised that in the event of non-anonymous reporting, CA Auto Bank guarantees that your identity will be protected in all cases, at every stage, and under all circumstances.

In processing the personal data you provide as a whistleblower, CA Auto Bank also acts as joint controller with Crédit Agricole Consumer Finance S.A., its parent company, and Crédit Agricole S.A., the parent company of the Crédit Agricole Banking Group. These entities have provided CA Auto Bank with the reporting platform and are responsible for receiving and managing the alerts concerning the subject of the report.

Additionally, CA Auto Bank acts as a joint controller with Crédit Agricole S.A., parent company of the Crédit Agricole banking Group, for the specific purpose of combating international terrorism, in the context of candidate data screening procedures.

1) METHODS OF DATA PROCESSING AND COLLECTION

Your personal data are processed and used for the purposes of recruitment, evaluation, and selection of personnel, as well as for the management of any whistleblowing reports you may submit, and to take the necessary and appropriate actions in strict compliance with confidentiality obligations, in accordance with EU Directive 2019/1937, as implemented into national law by Legislative Decree No. 24 of March 10, 2023, on whistleblowing.

Additionally, your data will be processed for the purpose of combating international terrorism. To this end, CA Auto Bank reserves the right to conduct screenings both at the start of the relationship and throughout its duration, to verify whether the candidate appears on any international sanctions lists. Similar screening is also carried out to identify Politically Exposed Persons (PEPs). For these verification activities, CA Auto Bank uses software provided by its direct and indirect parent companies, Crédit Agricole Personal Finance & Mobility S.A. and Crédit Agricole S.A., the latter operating as a joint controller.

Accordingly, employee master data are transferred daily to Crédit Agricole S.A. and Crédit Agricole Personal Finance & Mobility S.A., in compliance with the necessary security measures and with access limited to authorized personnel only, for the duration of the relationship with CA Auto Bank.

The legal basis for the processing of personal data is Article 6, letter c) of the GDPR, namely compliance with legal obligations.

The provision of the requested data for the purposes described in this section is necessary for the conclusion of the contract. Any refusal to provide such data will make it impossible to carry out the activities required for the execution and completion of the contract.



Data processing will be conducted in full compliance with applicable regulations, based on the information provided, and in a fair and transparent manner. Only the minimum amount of data necessary for the purposes outlined above will be collected, and it will be processed accurately and kept up to date, in accordance with applicable Italian and European laws.

The Data Controller adopts appropriate and up-to-date security measures to prevent your data from being lost, misused, accessed without authorization, altered, or disclosed. You will be notified by the Data Controller in the event of any personal data breaches. Data may be collected directly from the data subject, from third parties engaged by the Data Controller for selection procedures, or from other third parties that have obtained the data directly from the data subject.

Data processing will be carried out using electronic, digital, and paper-based methods.

2) TYPES OF DATA PROCESSED

Personal information provided in CVs, introduction letters, or obtained during assessment interviews will be collected, stored, and processed. Only common data will be collected; therefore, candidates will not be required to provide data classified as special under Article 9 of European Regulation 2016/679, except in cases where such data is necessary for the establishment of the employment relationship. This may include pre-employment medical assessments to evaluate the candidate's ability to work for health reasons, or if the candidate belongs to protected categories.

3) NATURE OF DATA PROVISION AND CONSENT

The provision of data is optional and at the discretion of the candidates submitting their Curriculum Vitae (CV). Regarding any data that may subsequently be requested by the Data Controller, failure to provide such data will prevent the verification of the prerequisites for employment, and consequently, the potential establishment of an employment relationship with the Data Controller.

Consent for the collection of special categories of data, or data that may be related to potential whistleblowing reports present in the CV, is not required (art. 9 letter b Reg. 2016/679), as the processing concerns data voluntarily provided in the CVs submitted by the Data Subjects for the purpose of potentially establishing an employment/collaboration relationship, for which consent is excluded.

4) COMMUNICATION AND TRANSMISSION OF DATA

The collected data will not be disclosed. The data may be shared with third parties identified and appointed as Data Processors pursuant to Articles 28 et seq. of Reg. 2016/679, if necessary for the purposes stated (e.g., selection and evaluation companies). Additionally, the data may be shared with other companies within the group to which CA Auto Bank belongs, for participation in selection procedures. Data will not be transferred to a third country outside the EU or to an international organization, except in exceptional and strictly necessary cases.

If necessary, for technical or operational reasons, the data may be processed in countries outside the European Union, provided that an adequate level of protection is ensured, and an appropriate adequacy decision has been made by the European Commission. Any transfer of personal data to non-EU countries, in the absence of an adequacy decision by the European Commission, will only occur if adequate contractual or agreement-based safeguards are in place by the Data Controllers and Processors involved, including standard contractual clauses on data protection (SCC). Transfers of data to third countries outside the EU, in the absence of an adequacy decision or other appropriate measures, will only occur when strictly necessary and in compliance with the provisions of the GDPR, and will be processed in your interest.

5) DATA RETENTION PERIOD

Data will be processed only for the time necessary to carry out procedures related to the search, evaluation, and selection of personnel, unless the data is needed for legal defense purposes.

In the case of a whistleblowing report, the personal data collected will be retained for 12 (twelve) months from the date the final outcome of the whistleblowing procedure is communicated, in accordance with the principle of data minimization set out in Article 5, paragraph 1, letter c), of the GDPR, and the legal obligations to which the Data Controller is subject under Article 14 of Legislative Decree No. 24 of March 10, 2023, implementing EU Directive 2019/1937.

6) DATA PROTECTION OFFICER'S CONTACT DETAILS

For any direct, formal, and urgent contact, other than the exercise of the rights provided in the following paragraph, you may contact the Data Protection Officer as follows:

- **Email:** dpo-italia@ca-autobank.com;
- **Telephone:** 011.4488.203 – an operator from our Customer Care department will answer and redirect the call to the Data Protection Officer;
- **Traditional mail:** CA Auto Bank S.p.A., C.so Orbassano 367 - 10137 Torino, indicating "Attn: Data Protection Officer".



7) RIGHTS OF THE DATA SUBJECT

In connection with the processing of the personal data listed above you may request:

- confirmation of whether personal data concerning you are being processed and, if so, access to the personal data, as well as information about the origin of the data, the purposes, processing methods, and the logic applied in the case of processing carried out using electronic tools;
- the updating, integration, correction, deletion, or transformation of the personal data concerning you into an anonymous form;
- the restriction or objection to the processing of personal data concerning you;
- the receipt of personal data concerning you in a structured, commonly used, and machine-readable format, or the transmission of the same to another data controller (also known as the right to portability);
- certification that the requested actions have been communicated to those to whom the data have been disclosed or disseminated.

in particular, we inform the reported person that the rights referred to in Articles 15 to 22 of the GDPR cannot be exercised (either by requesting the Data Controller or by filing a complaint under Article 77 of the GDPR) if such actions would result in an actual and concrete risk of compromising the confidentiality of the whistleblower's identity (see Article 2-undecies of the Privacy Code and Article 23 of the GDPR) and/or obstructing the objectives of compliance with the legislation on reporting unlawful conduct. For more information on how to exercise your rights, please refer to the Whistleblowing Privacy Notice, available on CA Auto Bank's website (<https://www.ca-autobank.com>).

The Data Controller also adheres to the provisions of Article 12 of Legislative Decree No. 24 of March 10, 2023, implementing EU Directive 2019/1937, which states that the identity of the reporting person and any other information that could directly or indirectly reveal their identity may not be disclosed, without the express consent of the reporting person, to individuals other than those authorized and competent to receive or follow up on the reports.

You are entitled to exercise your rights by contacting CA Auto Bank S.p.A.'s Customer Care as follows:

- **Telephone:** ++39 011.4488.203;
- **Email:** customer.care@ca-autobank.com

The Data Controller will acknowledge your requests within 30 (thirty) days of receipt, unless an extension of up to 60 (sixty) days is necessary due to their complexity and number. After the aforementioned time limits, you have the right to file a complaint with the Data Protection Authority in the form and manner provided by the applicable legislation.

Place and Date

Signed by

(the **Data Subject**)



AUTO BANK

