

**TEMPLATE**  
**"Declaration of acceptance of candidacy for the office of Director"**

The undersigned, ....., Tax Code....., born in .....(....), on ..... with regard to his/her candidacy for the office of DIRECTOR of Banca Monte dei Paschi di Siena S.p.A. (hereinafter also "**BMPS**" or the "**Bank**") with reference to item no. 1) on the agenda of the Ordinary Shareholders' Meeting convened on 29 October 2026,

- considering the specific provisions contained in Article 91 of Directive 2013/36/EU of 26 January 2013, as subsequently amended ("**CRD**"), in Articles 2382 and 2387 of the Italian Civil Code, in Articles 147-ter and 147-quinquies of Legislative Decree no. 58 of 24 February 1998 ("**TUF**"), in Article 26 of Legislative Decree no. 385 of 1 September 1993 ("**TUB**"), in the Decree of the Ministry of Economy and Finance no. 169 of 23 November 2020 (the "**MEF Decree 169**" or "MEF Decree"), in Article 15 of the Bank's By-Laws ("**By-Laws**"), in the recommendations of the Corporate Governance Code;

**DECLARES**

under his/her own and exclusive responsibility pursuant to the applicable law and the By-Laws, to stand as candidate and, in the event of appointment, to irrevocably accept the office of DIRECTOR of Banca Monte dei Paschi di Siena S.p.A. and furthermore,

**CERTIFIES**

the absence of grounds for ineligibility, forfeiture and incompatibility, as well as the possession of the requirements prescribed by the applicable legislation and the By-Laws of BMPS to hold the office of DIRECTOR of Banca Monte dei Paschi di Siena S.p.A.

**DECLARES**

**A)** to possess the **reputation requirements** set forth in art. 3 of MEF Decree 169 and to satisfy the **correctness criteria** set forth in Article 4 of MEF Decree 169;

**B) with regard to professionalism requirements:**

- ☐ to possess the knowledge, skills and experience required by the CRD, the TUB and the MEF Decree 169, as well as by the applicable legislative, regulatory and statutory provisions, also taking into account the qualitative and quantitative composition defined for the Board of Directors of the Bank as described in the document "*Orientamenti per gli azionisti relativi alla composizione quali-quantitativa del Consiglio di Amministrazione di Banca Monte dei Paschi di Siena S.p.A.*" ("*Guidelines for shareholders on the qualitative and quantitative composition of the Board of Directors of Banca Monte dei Paschi di Siena S.p.A.*") dated 19 February 2026 and made available to the shareholders (the "**Guidelines**"), and to satisfy the competence criteria set out in Article 10 of the MEF Decree 169; in particular,
- ☐ to have gained overall experience of at least three years<sup>1</sup> over the last twenty years; the following are the activities carried out during this period<sup>2</sup>:

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<sup>1</sup> See Article 7 of MEF Decree 169, to which reference is made for further details. In this regard please note:

for the position of non-executive Director, at least three years of gained experience are required.

Pursuant to Article 7, paragraph 5 of MEF Decree 169, the experience gained over the twenty years prior to taking up the position is taken into account for the purposes of determining whether the professional requirements are met.

<sup>2</sup> To be reported, for Directors with non-executive roles:

a) – management or control activities or executive duties performed in companies operating in the credit, financial, securities, or insurance sectors; and/or:

- management or control activities or executive roles performed at listed companies or companies of a size and complexity greater than or comparable (in terms of turnover, nature and complexity of the organization, or business activities) to that of the Bank;

b) alternatively to those mentioned above:

[●] from [DD/MM/YYYY] to [DD/MM/YYYY] role [·] at company/entity [·]

[●] from [DD/MM/YYYY] to [DD/MM/YYYY] role [·] at company/entity [·]

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To this end, please find attached a signed *curriculum vitae* (“**CV**”) in Italian and English (see Annex 1.A and Annex 1.B);

**C) with regard to independence requirements:**

- ☐ to meet the independence requirements for directors under the combined provisions of Articles 147-ter paragraph 4 and 148 paragraph 3 of the TUF;
- ☐ NOT to meet the independence requirements under the combined provisions of Articles 147-ter paragraph 4 and 148 paragraph 3 of the TUF;

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- ☐ to meet the independence requirements under Article 13 of MEF Decree 169;
- ☐ NOT to meet the independence requirements under Article 13 of MEF Decree 169;

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- ☐ to meet the independence requirements set out in the Corporate Governance Code and, in particular, those provided for under specific Recommendation no. 7;
- ☐ NOT to meet the independence requirements set out in the Corporate Governance Code and the specific recommendations set out therein;

and, therefore:

- ☐ to meet all the independence requirements set out in Article 15 of the Bank's By-Laws<sup>3</sup>;
- ☐ NOT to meet all the independence requirements set out in Article 15 of the Bank's By-Laws.

The undersigned also:

- **DECLARES** to be aware of the content of the aforementioned MEF Decree 169, of the current *Supervisory provisions on the fit and proper assessment procedure for officers of banks, financial intermediaries, electronic money institutions, payment institutions and deposit guarantee schemes* issued by the Bank of Italy on 4 May 2021, of the guidelines and directions provided on Fit & Proper by the European Central Bank (“*Guide*

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– professional activities performed in matters related to the credit, finance, securities, or insurance sectors, or in any case functional to the Bank's business; and/or  
– university teaching, as a full-time or associate professor, in legal or economic subjects or in other subjects functional to the credit, finance, securities, or insurance sector; and/or  
– executive, managerial or senior management roles, however denominated, performed at public entities or public administrations related to the credit, finance, securities, or insurance sectors, provided that the entity where such roles were performed is of comparable size and complexity to the Bank.

<sup>3</sup> Article 15 of the BMPS' By-Laws refers to the independence requirements established by the applicable laws and regulations and to the additional requirements set forth in the Corporate Governance Code.

*to fit and proper assessment of banking officers”*- December 2021, hereinafter also the “**ECB Guide**”) and of the provisions of the EBA/ESMA Guidelines <sup>4</sup>.

- **DECLARES** to be aware that, for the purposes of meeting the independence requirements pursuant to Article 13, paragraph 1, letter h) of MEF Decree 169 and Recommendation no. 7 of the Corporate Governance Code, no Significant Relationships must exist between the candidate director and the Bank and the other parties identified by the aforementioned regulatory provisions, as set out in the Guidelines.
- **DECLARES to be able to dedicate adequate time** to carrying out the duties of DIRECTOR of the Bank, taking into account the provisions of Articles 16 et seq. of MEF Decree 169, as well as the minimum time estimated by the Bank as necessary for the proper performance of the duties of Director according to the minimum time estimated by the Bank and identified in the Guidelines.
- **DECLARES** to comply with **the limit on the accumulation of offices** set forth in Article 17 of the MEF Decree 169 and, to this end, provides the information by completing and signing Annex 2 “List of management and control positions”.
- **DECLARES** to be able to act with **independence of mind** and awareness of the duties and rights associated with the office pursuant to Article 15 of MEF Decree 169 and in compliance with the provisions of the ECB Guide and the EBA/ESMA Guidelines and to have provided the Bank with all information regarding the situations referred to in Article 13, paragraph 1, letters a), b), c), h) and i) of MEF Decree 169.
- **DECLARES** not to be in any of the situations of incompatibility provided for by the applicable legislation, in particular Article 2390 of the Italian Civil Code, and not to hold the office of member of the Board of Directors, the Management Board and/or the Supervisory Board or the Board of Statutory Auditors of competing banks, not belonging to the Montepaschi Banking Group, which have a banking license issued by the Supervisory Authority and are active in the banking funding or ordinary lending markets in Italy. This circumstance is evidenced by the list of offices held in banks or other commercial companies (Annex 2 “List of management and control offices”).
- **DECLARES**, furthermore, that he/she possesses the identified professional, personal, and attitudinal characteristics, which also include theoretical knowledge and practical experience, including advanced, in more than one of the areas of competence indicated in Article 10 of MEF Decree 169 and in the Guidelines, as specified by the undersigned through the information provided in Annex 3.
- **DECLARES**, that in his/her regards there are no grounds for forfeiture, suspension, or prohibition pursuant to Article 67, nor any situations relating to attempted mafia infiltration pursuant to Article 84, paragraphs 4 and 4-*bis*, of the Anti-Mafia Code;
- **DECLARES**        ☐ to be                      ☐ not to be  
a public official pursuant to and within the meaning of Legislative Decree no. 165/2001 as amended and to benefit from the exemptions for purposes of serving the role of member of the Board of Directors and to have requested prior authorization from the Public Administration for the possible performance of the role.
- **UNDERTAKES** in the event of appointment, to provide the Bank with any additional information, documentation, or clarifications necessary to enable assessments and verifications regarding the fit and proper requirements for carrying out the role of officer at Banca Monte dei Paschi di Siena S.p.A., as required by MEF Decree 169, the competent body, and/or the Supervisory Authorities.

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<sup>4</sup> EBA and ESMA Guidelines on the assessment of the suitability of members of the management body and key function holders (updated on 2 July 2021).

- **UNDERTAKES** to immediately communicate any supervening event, significant change, or any subsequent variation to any of the information provided in this declaration and to produce, if requested, appropriate documentation to confirm the accuracy of the data declared.
- **DECLARES** to have read the privacy notice provided by the Bank pursuant to Articles 13 and 14 of the GDPR (Annex 4 "Privacy Notice") and expressly **AUTHORIZES** the publication and dissemination to the public of the personal and professional data and information contained in this declaration, in the *curriculum vitae* and in the related annexes.

Yours faithfully,

Place, date

Signature

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**ANNEX 1.A**

**CURRICULUM VITAE IN ITALIAN LANGUAGE**

Yours faithfully,

Place, date

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Signature

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**ANNEX 1.B**

**CURRICULUM VITAE IN ENGLISH LANGUAGE**

Yours faithfully,

Place, date

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Signature

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ANNEX 2

LIST OF MANAGEMENT AND CONTROL POSITIONS

The undersigned, ....., Tax Code....., born in .....(....), on .....

DECLARES

☐ **NOT** to hold management and control positions <sup>5</sup>;

or

☐ to hold the following management and control positions

| Position held | Company/<br>Entity<br>Denomination | Registered<br>Office | Tax Code<br>VAT no. | Start Date of<br>the Position | Note<br>(e.g. listed/not<br>listed<br>Company) |
|---------------|------------------------------------|----------------------|---------------------|-------------------------------|------------------------------------------------|
|               |                                    |                      |                     |                               |                                                |
|               |                                    |                      |                     |                               |                                                |
|               |                                    |                      |                     |                               |                                                |

Yours faithfully,

Place, date

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Signature

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<sup>5</sup> Including any positions as General Manager.

ANNEX 3

CANDIDATE PROFILE AND COMPETENCE CRITERIA

The undersigned, ....., Tax Code....., born in .....(....), on .....

DECLARES

1) to possess the following level of skills (theoretical knowledge and/or practical experience) with reference to more than one of the following areas of competence (by ticking the relevant boxes in the table below and then describing them in the relevant fields after the table) as recommended and specified in the Guidelines<sup>6</sup> made available to Shareholders:

|    | Skills Matrix                                                                                                                 | Level of Skills            |                       |       |
|----|-------------------------------------------------------------------------------------------------------------------------------|----------------------------|-----------------------|-------|
|    |                                                                                                                               | Very Advanced <sup>7</sup> | Advanced <sup>8</sup> | Basic |
| 1  | Banking and financial markets (knowledge of the business in which the Bank and the Montepaschi Group operate)                 |                            |                       |       |
| 2  | Corporate governance and organizational structures                                                                            |                            |                       |       |
| 3  | Guidelines and strategic planning                                                                                             |                            |                       |       |
| 4  | Management of corporate entities in managerial and/or entrepreneurial roles in complex contexts, including non-financial ones |                            |                       |       |
| 5  | Banking and financial regulation                                                                                              |                            |                       |       |
| 6  | Risk Management                                                                                                               |                            |                       |       |
| 7  | Internal control systems and other operational mechanisms                                                                     |                            |                       |       |
| 8  | Knowledge of remuneration policies                                                                                            |                            |                       |       |
| 9  | Experience gained in coordinating, directing, or managing human resources                                                     |                            |                       |       |
| 10 | Banking and financial activities and products/services                                                                        |                            |                       |       |
| 11 | Insurance markets and products and related regulation                                                                         |                            |                       |       |
| 12 | Knowledge of climate and environmental risks                                                                                  |                            |                       |       |
| 13 | ESG/Sustainability                                                                                                            |                            |                       |       |
| 14 | ICT, AI, technology, cybersecurity and digital innovation                                                                     |                            |                       |       |
| 15 | Accounting and financial reporting and interpretation of financial data                                                       |                            |                       |       |

☐ “Banking and financial markets (knowledge of the business in which the Bank and the Montepaschi Group operate)” acquired through<sup>9</sup>:

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<sup>6</sup> For a description of the required skills, see also Annex 1 of the Guidelines (‘Description of Skills’).  
<sup>7</sup> The term “**very advanced level**” of **skills** refers to an even more robust level of competence than the “advanced level” (see following note) in respect of certain most common skills (banking and financial markets, corporate governance and organizational structures, strategic guidelines and planning) and in respect of specific and strategic skills, also in light of discussions with the ECB (ICT, AI, technology, IT security and digital innovation, ESG/sustainability) as specified in paragraph 12 of the Guidelines.  
<sup>8</sup> The term “**advanced level**” of **skills** in relation to each subject, refers to: (i) with respect to **experience**, the **practical** and **professional** experiences effectively acquired at an executive or senior management level in relation to specific roles and over a significant period of time (at least five years in the last twenty); (ii) in relation to **knowledge**, knowledge is considered advanced when it has been acquired through specific training courses and accompanied by a recognized professional profile and/or achieved through the acquisition of practical experiences (including multi-year ones in strategic supervisory bodies), as appropriately represented and certified in the *curriculum*.  
<sup>9</sup> With reference to each of the declared skills, please report the candidate's "practical experience" as well as the means by which the "theoretical knowledge" claimed was acquired (see also Article 10 of MEF Decree 169), expressly indicating positions, certifications or other attestations (including those issued by third parties) that demonstrate the level of knowledge and/or experience gained/acquired in previous years.

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☐ “*Corporate governance and organizational structures*” acquired through:

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☐ “*Guidelines and strategic planning*” acquired through:

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☐ “*Management of corporate entities in managerial and/or entrepreneurial roles in complex contexts, including non-financial ones*” acquired through:

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☐ “*Banking and financial regulation*” acquired through:

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☐ “*Risk Management*” acquired through:

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☐ “*Internal control systems and other operational mechanisms*” acquired through:

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☐ “*Knowledge of remuneration policies*” acquired through:

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☐ “*Experience gained in coordinating, directing, or managing human resources*” acquired through:

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☐ “Banking and financial activities and products/services” acquired through:

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☐ “Insurance markets and products and related regulation” acquired through:

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☐ “Knowledge of climate and environmental risks<sup>10</sup>” acquired through:

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☐ “*ESG/Sustainability*” acquired through:

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□ “ICT, AI, technology and cyber security and digital innovation” acquired through<sup>11</sup>:

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□ “Accounting and financial reporting and interpretation of financial data” acquired through:

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Yours faithfully,

Place, date

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Signature

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<sup>10</sup> See for example “Guide on climate-related and environmental risks – Supervisory expectations for risk management and disclosure” European Central Bank, November 2020.

<sup>11</sup> As already specified in the previous note 8, indicate the "theoretical knowledge" acquired in the specific IT field (e.g. master's degree, doctorate, certificates or other) and the "practical experience" gained in the specific IT field (e.g. professional activities, university teaching, managerial, executive or top management roles, other) also in order to demonstrate the advanced level of theoretical knowledge/practical experience declared in the table.

## ANNEX 4

### **Privacy Notice pursuant to Articles 13 and 14 of EU Regulation 679/2016 "General Data Protection Regulation", hereinafter GDPR.**

**Banca Monte dei Paschi di Siena S.p.A.** (hereinafter, for the sake of brevity, also the **"Bank"**), as Data Controller, informs you about the use of your personal data and the rights granted to you under the GDPR or the applicable national legislation (Legislative Decree no. 196/2003 "Personal Data Protection Code", as amended by Legislative Decree no. 101/18), including the provisions of the Italian Data Protection Authority.

#### **1. Source of Personal Data**

The personal data acquired by the Bank are provided by you when completing the application form or contained in the *curriculum vitae* submitted in connection with your candidacy as a member of the corporate bodies of an MPS Group company.

#### **2. Categories of personal data processed**

For the purposes indicated below, the following categories of personal data may be processed:

- identification and contact information (such as, for example, name, surname, date of birth, tax code, address, etc.);
- data provided through the acquisition of the *curriculum vitae* and relating to previous work experience (such as, for example, positions held and any benefits, etc.);
- data certifying possession of the legal requirements for the assessment process of individuals who will be designated as members of the corporate bodies of subsidiaries, and, in particular, judicial data pursuant to Articles 10 of the GDPR and 2-*octies* of Legislative Decree no. 196/2003, suitable to reveal criminal records, pending charges, or the status of defendant or person under investigation pursuant to Articles 60 and 61 of the Code of Criminal Procedure; The legal basis for processing this data is compliance with the Data Controller's legal obligations;
- data that the Law defines as "special categories of data," as they may reveal religious beliefs, political party affiliation, trade union membership, or health status.

If personal data that is not relevant to the intended purpose is transmitted, in any manner or form, the Bank will refrain from using such information and will destroy it.

#### **3. Purposes and legal basis of data processing**

The data acquired is processed, in addition to fulfilling obligations required by law, regulations, EU legislation, and provisions issued by Authorities legally empowered to do so or by competent supervisory or oversight Authorities, in order to assess and verify the aptitudes, professional skills, reputation requirements, and absence of grounds for ineligibility for the appointment as a member of the corporate bodies of companies controlled by Banca Monte dei Paschi di Siena S.p.A. For these purposes, providing the aforementioned data is necessary to carry out the activities relating to the verification and assessment of the requirements; therefore, failure to provide personal data will result in the Bank's inability to comply with the regulatory requirements for the appointment and, consequently, to accept your candidacy. In this regard your consent to the processing of data is not required, since the legal basis legitimizing the processing is (i) the need for the Bank to have the data to assess the candidacy you spontaneously submitted, or (ii) the performance of the legal obligations connected to the submission of the candidacy, in the presence of appropriate safeguards for the fundamental rights and interests of the candidate.

#### 4. Data processing methods

Your personal data is processed using paper, computer, electronic and telematic means, using methods strictly related to the purposes indicated above, in a manner that guarantees its security and confidentiality and, in any case, in compliance with adequate technical and organizational measures to ensure a level of security appropriate to the risk.

#### 5. Categories of persons to whom the data may be disclosed

Your personal data may be disclosed to third parties appointed as data processors pursuant to Article 28 of the GDPR, of which the Bank avails itself for the assessment and selection of candidates or for processing related to those carried out by the Bank itself, always as part of personnel selection activities. Finally, the following categories of natural persons - authorized to process the data under the direct authority of the Data Controller or Data Processor - who, in connection with the performance of the duties assigned to them, need to access and process the data, may also have access to such data:

- Bank employees or those seconded to the Bank;
- interns, project workers;
- employees of the companies appointed as Data Processors;
- persons who may access the data in compliance with an obligation under laws, regulations, or other national or EU legislation, or pursuant to instructions issued by authorized authorities and/or in compliance with requests from supervisory Authorities (e.g., the Bank of Italy, the European Central Bank, etc.) and oversight Authorities.

#### 6. Transfer of data abroad

To achieve the purposes related to the selection activities, your personal data may be transferred abroad, within and/or outside the European Union, always in compliance with the rights and guarantees provided by the applicable data protection legislation (Chapter V - Transfer of Personal Data to Third Countries or International Organizations of the GDPR).

This includes the application of Standard Contractual Clauses defined by the European Commission for transfers to third-party companies or verification of the presence of an adequacy assessment of the personal data protection system of the importing country.

#### 7. Data retention period

Your data will be retained for the time strictly necessary to fulfill the purposes for which they were collected, in compliance with the statutory or other terms established by law for their retention, or for a longer period if retention is necessary to protect the Data Controller's rights.

#### 8. Rights of the interested party

In relation to the processing described above, you are entitled to exercise the rights set forth in Article 15 et seq. of the GDPR, in particular the right to:

- **access**, *i.e.*, to obtain confirmation whether or not personal data concerning you exist, to know its origin, as well as the logic and purposes underlying the processing, the recipients or categories of recipients to whom the data may be disclosed, and to determine the retention period, if this can be defined;
- **rectify** inaccurate data;
- **erasure** (so-called “right to be forgotten”), if the data is no longer necessary for the purposes for which it was collected and subsequently processed, or if the data subject has withdrawn consent to the processing (where such consent is voluntary or there is no other legal basis for the processing);
- **restriction**, *i.e.*, the right to obtain from the Bank the restriction of access to personal data by all parties who have a service contract or an employment contract with the Bank. In some cases, the Bank reserves the right to allow access to a limited number of individuals in order to guarantee the security, integrity, and accuracy of the aforementioned data;

- **portability**, *i.e.*, the right to receive personal data concerning the data subject in a structured, commonly used, and machine-readable format, with the option of transmitting them to another Data Controller. This right does not apply to non-automated processing (for example, paper archives or records); furthermore, only data processed with the data subject's consent and only if the data has been provided by the data subject are subject to portability;
- **objection**, *i.e.*, the right to object to the processing for reasons related to your particular situation;
- **lodge a complaint** with the Italian Data Protection Authority, Piazza Venezia no. 11 – 00187 Rome (garante@gpdp.it; telephone + 39 06 69677.1; fax + 39 06 69677.3785).

To exercise the above rights, the data subject may contact directly the branch at which the relationship is maintained and/or at which the execution of operations, including occasional ones, or the provision of services is requested, or at the following addresses:

Data Protection Officer  
 Via A. Moro n. 11/13 - 53100 Siena;  
 Fax 0577/296520  
[privacy@mps.it](mailto:privacy@mps.it)  
[responsabileprotezionedeidati@postacert.gruppo.mps.it](mailto:responsabileprotezionedeidati@postacert.gruppo.mps.it)  
[responsabileprotezionedati@mps.it](mailto:responsabileprotezionedati@mps.it)

## 9. Data Controller and Data Protection Officer

The Data Controller is Banca Monte dei Paschi di Siena S.p.A., with registered office in Siena at Piazza Salimbeni no. 3. The Bank has appointed a Data Protection Officer (“**DPO**”), who supports the Data Controller (the Bank) in ensuring the proper processing of personal data. The DPO can be contacted using the contact details above.

**ANNEX 5**  
**PRIVACY STATEMENT**  
**FIT AND PROPER PROCEDURE**

**PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF THE FIT AND PROPER PROCEDURE**

The safety and soundness of a credit institution depend on the availability of appropriate internal organisation structures and corporate governance arrangements. Council Regulation (EU) No 1024/2013 of 15 October 2013 (**SSM Regulation**)<sup>12</sup> confers specific tasks on the European Central Bank (**ECB**) concerning policies relating to the prudential supervision of credit institutions on the basis of Article 127(6) of the Treaty on the Functioning of the European Union (**TFEU**).

For prudential supervisory purposes, the ECB is entrusted with the tasks in relation to credit institutions established in the participating Member States referred to in Article 4, within the framework of Article 6, of the SSM Regulation.

According to Article 4(1)(e) of the SSM Regulation, the ECB is to ensure compliance with the acts of the relevant Union law which impose requirements on credit institutions to have in place robust governance arrangements, including the **fit and proper requirements for the persons responsible for the management of credit institutions**. For the purpose of carrying out its tasks, pursuant to Article 16(2)(m) of the SSM Regulation, the ECB has also the supervisory power to remove at any time members from the management body of credit institutions who do not fulfil the requirements set out in the acts of the relevant Union law. Article 91(1) of **CRD IV**<sup>13</sup> sets that members of the management body shall at all times be of sufficiently good repute and possess sufficient knowledge, skills and experience to perform their duties. Within the procedures for the supervision of significant supervised entities, Articles 93 and 94 of the **SSM Framework Regulation**<sup>14</sup> lay down the rules on the assessment by the ECB regarding the compliance with the fit and proper requirements for persons responsible for managing credit institutions. In order to ensure that fit and proper requirements are met at all times, according to Article 94(2) of the SSM Framework Regulation the ECB may initiate a new assessment based on new facts if the ECB becomes aware of any new facts that may have an impact on the initial assessment of the concerned member of the management body.

**DISCLOSURE OF PERSONAL DATA**

All the required personal data is necessary to carry out the fit and proper assessment of members of management bodies of existing significant supervised entities. If not provided, the ECB may not assess whether the concerned managers comply with the fit and proper requirements, in order to ensure that credit institutions have in place robust governance arrangements. Therefore, it shall reject the appointment or request the dismissal of the concerned managers on that basis.

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**RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA**

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<sup>12</sup> Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions, OJ L 175, 14.6.2014.

<sup>13</sup> Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC, OJ L 176, 27.6.2013.

<sup>14</sup> Regulation (EU) No 468/2014 of the European Central Bank of 16 April 2014 establishing the framework for cooperation within the Single Supervisory Mechanism between the European Central Bank and national competent authorities and with national designated authorities, OJ L 141, 14.5.2014.

In the fit and proper procedure the personal data may be disclosed, on a need-to-know basis, to the NCAs' staff, the Joint Supervisory Teams' staff (ECB Directorate General – Micro-Prudential Supervision I or II), ECB Directorate General – Micro-Prudential Supervision IV staff (Authorisation Division), the Secretariat of the Supervisory Board and the members of the Supervisory Board and of the Governing Council of the ECB.

#### **APPLICABLE RETENTION PERIOD**

The ECB is to store personal data regarding fit and proper applications/notifications for a period of fifteen years; from the date of application or notification if withdrawn before a formal decision is reached; from the date of a negative decision or from the date the data subjects cease to be members of the management bodies of the supervised entity in the case of a positive ECB decision. In case of re-assessment based on new facts, the ECB is to store personal data for fifteen years from the date of the ECB decision. In case of initiated administrative or judicial proceedings, the retention period shall be extended and end one year after these proceedings are sanctioned by a decision having acquired the authority of a final decision.

#### **APPLICABLE DATA PROTECTION FRAMEWORK AND DATA CONTROLLER**

Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data<sup>15</sup> is applicable to the processing of personal data by the ECB. For the purposes of Regulation (EC) No 45/2001, the ECB shall be the Data Controller.

#### **DATA SUBJECT RIGHTS**

The data subjects of the processing of personal data by the ECB for the mentioned prudential supervisory purpose have access rights to and the right to rectify the data concerning him or herself according to Article 9 of the ECB Decision of 17 April 2007 adopting implementing rules concerning data protection at the ECB (ECB/2007/1)<sup>16</sup>.

#### **POINT OF CONTACT**

In case of queries or complaints regarding this processing operation, you can contact the Data Controller at [Authorisation@ecb.europa.eu](mailto:Authorisation@ecb.europa.eu), and/or the National Competent Authority at [Servizio.sb1.gruppi\\_bancari3@bancaditalia.it](mailto:Servizio.sb1.gruppi_bancari3@bancaditalia.it) and [liberato.intonti@bancaditalia.it](mailto:liberato.intonti@bancaditalia.it).

Equally, you also have the right to have recourse at any time to the European Data Protection Supervisor. The data subjects also have the right to recourse at any time to the European Data Protection Supervisor: <https://secure.edps.europa.eu/EDPSWEB/edps/lang/en/EDPS>.

Date,

\_\_\_\_\_  
Signature

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<sup>15</sup> OJ L 8, 12.1.2001.

<sup>16</sup> OJ L116, 4.5.2007.