



Generali Real Estate S.p.A.

PERSONAL DATA PROTECTION POLICY

Assets & Wealth Management Compliance Function

Generalirealestate.com

ABSTRACT

1 Executive Summary

Objective of the document

- Ensure the implementation of the Relevant Data Protection Regulation
- Set the minimum requirements that Generali Real Estate S.p.A. must implement when Processing Personal Data

Scope of application

The document applies to:

- Generali Real Estate S.p.A. as well as to its branches and
- All employees

2 Key Principles governing Personal Data Processing

Personal Data processing shall be carried out in compliance with the Relevant Data Protection Regulation and this Policy; specifically, it shall be based on the following key principles:

- **lawfulness, fairness and transparency:** identify valid grounds (known as a 'lawful basis') for the Processing and provide Data Subjects with a proper Privacy Notice. Processing Personal Data in a way that is unduly detrimental, unexpected or misleading to the Data Subjects concerned is not allowed;
- **purpose limitation:** collect Personal Data only for specified, explicit and legitimate purposes, as described in the Privacy Notice. Further Processing, incompatible with those purposes, is not allowed;
- **minimization:** process only Personal Data strictly necessary to pursue the purposes described in the Privacy Notice;
- **accuracy:** do not process inaccurate Personal Data and, where necessary, keep them updated; when it is discovered that Personal Data are inaccurate, in respect for the purposes for which they are processed, the Data Controller must take reasonable steps to correct or erase them without delay;
- **storage limitation:** keep Personal Data for no longer than necessary for the purposes for which they are processed; define a retention period. The duration of the retention period is set on the basis of the purposes of the Processing to the extent that it does not conflict with other local applicable laws and regulations. Following the expiration of the retention period, Personal Data can be retained only in a form which does not permit the identification of the Data Subjects. To implement this principle technical measures to irreversibly de-identify Personal Data, which include deletion, obfuscation, redaction, anonymization, must be adopted;
- **integrity and confidentiality:** ensure that appropriate organizational and technical measures are in place to protect Personal Data, so to avoid un-authorized or unlawful Processing, accidental loss, destruction, or damage.

The Data Controller is responsible for the compliance with the principles above and must be able to demonstrate it at all times (“**accountability**” principle), through the adoption of appropriate internal regulations, processes and other measures which can include, at least, the keeping of a record of processing operations, the performance of a DPIA, the performance of controls to verify the status of implementation of the Personal Data protections principles and requirements.

3 Key Requirements

Considering the above principles, different key requirements need to be implemented depending on whether Personal Data are being processed by GRE S.p.A. acting as Data Controller, as Data Processor or as Joint Controller. The Data Controller and the Data Processor must provide the personnel who process Personal Data with appropriate instructions and training in order to ensure that Personal Data are processed in compliance with this Policy and the Relevant Data Protection Regulation.

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