

Data Processing Addendum Exhibit

This Data Processing Addendum Exhibit (DPA Exhibit) specifies the DPA for the Service Intesa is supplying you.

1. Processing

Intesa will process Client Personal Data for the Service, as described in the relevant contract, in the relevant DPA and as supplemented and specified by this DPA Exhibit.

1.1 Processing Activities

The processing activities with regard to Client Personal Data can be:

- Copies
- Deletes
- Reads
- Receives
- Sends
- Stores
- Updates

2. Client Personal Data

2.1 Categories of Data Subjects

The list set out below is information about the Categories of Data Subjects whose Personal Data generally can be processed within the Service.

- Client's employees (including temporary or casual workers, volunteers, assignees, trainees, retirees, pre-hires and applicants)
- Client's affiliates employees (including temporary or casual workers, volunteers, assignees, trainees, retirees, pre-hires and applicants)
- Client's (potential) customers (if those (potential) customers are individuals)

IN.TE.S.A. - Iniziative Telematiche per Servizi Applicativi S.p.A.
Sede legale: Strada Pianezza, 289 - 10151 Torino - Italy
Capitale Sociale Euro 6.300.000 i.v.
Data di costituzione 05-03-1987
Partita IVA - Codice Fiscale e numero d'iscrizione Registro Imprese: 05262890014
Numero R.E.A.: 696117
Società con unico azionista - Società appartenente al Gruppo IBM Italia S.p.A.

Sede operativa:
Strada Pianezza, 289
10151 Torino
Tel. +39 011 19216.111
marketing@intesa.it



- Employees of Client's (potential) customers
- Client's business partners (if those business partners are individuals)
- Employees of Client's business partners
- Client's visitors
- Client's suppliers and subcontractors (if those suppliers and subcontractors are individuals)
- Employees of Client's suppliers and subcontractors
- Client's agents, consultants and other professional experts (contractors)

Given the nature of the Services, Client acknowledges that Intesa is not able to verify or maintain the above list of Categories of Data Subjects. Therefore, Client will notify Intesa about any required changes of the list above, in writing, to Intesa. Intesa will process Personal Data of all Data Subjects listed above in accordance with the relevant contract. If changes to the list of Categories of Data Subjects require changes of the agreed Processing, Client shall provide Additional Instructions to Intesa as set out in the DPA.

2.2 Types of Personal Data and Special Categories of Personal Data

2.2.1 Types of Personal Data

The following list sets out what Types of Client Personal Data generally can be processed within the Service:

- **Capabilities and Qualifications of the Individual**
 - Profession and Employment Information
 - Professional Affiliations
- **Characteristics of the Individual**
 - Biometric
 - Criminal Records and Prosecutions
 - Demographic
 - Economic and Financial

- Health and Medical Records
- Nationality and Citizenship
- Opinion
- Personal Preference and Interest
- Racial or Ethnic Origin
- Religious or Philosophical Beliefs
- **Identity of the Individual**
 - Government Identities
 - Identification Number
 - Individual
 - Online Access and Authentication Credentials
 - Online Connection and Network Connectivity Data
 - Online Identifier
 - Person Name
 - Technology Identifiers
 - Telephony
- **Location of the Individual**
 - Appointments, Schedules, Calendar Entries
 - Physical Location of the Individual

2.2.2 Special Categories of Personal Data

The following list sets out what Special Categories of Client Personal Data generally can be processed within the Service.

- Personal Data revealing racial or ethnic origin
- Personal Data revealing political opinions
- Personal Data revealing religious or philosophical beliefs
- Personal Data revealing trade union membership
- Genetic or biometric data
- Data concerning health

- Personal Data relating to criminal convictions and offences

2.2.3 General

The lists set out in sections 2.2.1 and 2.2.2 above are information about the Types of Personal Data and Special Categories of Personal Data that generally can be processed within the Service.

Given the nature of the Services, Client acknowledges that Intesa is not able to verify or maintain the above lists of Types of Client Personal Data and Special Categories of Client Personal Data. Therefore, Client will notify Intesa about any required changes of the lists above in writing within 30 days. Intesa will process all Types of Client Personal Data and Special Categories of Client Personal Data listed above in accordance with the Agreement. If changes to the lists of Types of Client Personal Data and Special Categories of Client Personal Data require changes to the agreed Processing, Client shall provide Additional Instructions to Intesa as set out in the DPA.

3. Technical and Organizational Measures

The technical and organizational measures (TOMs) applicable to the Service can be found attached to this DPA Exhibit as Appendix (1). Client confirms its obligation to implement appropriate TOMs within its own area of responsibility as required by applicable Data Protection Laws.

4. Deletion and return of Client Personal Data

Intesa will delete Client Personal Data at the end of the Service except otherwise stated in the relevant contract. However, if the Client is willing to obtain a copy of its Personal Data and the contract does not provide such possibility, it can instruct Intesa, in writing, prior to the expiration or termination of the Service. In that case Intesa will return a copy of Client Personal Data that is accessible to Intesa within a reasonable period and in a reasonable format at Client's expense according to the terms for Assistance as set forth in the DPA.

5. Subprocessors

Intesa may use the Subprocessor(s) listed below in the Processing of Client Personal Data.

The Client can identify the Subprocessor(S) involved in the purchased services from the descriptions of the Services below. The following lists of Subprocessor(S) are confidential.

- **Trusted Hub**

(Software and EDI Services, and all services from EDI portals or services for the exchange of documents in structured format, the special community are included, eg. Euritmo.)

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
O.& S.I. SRL	Via Goldoni, 27 CERRO MAGGIORE (MI) 20023 IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
SKEBBY - MOBILE SOLUTION S.r.l.	VIA MELZO 12 MILANO (MI) 20129, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT
TECHEDGE SpA	VIA CALDERA, 21 MILANO (MI) 20153, IT

c.

IBM Data Importers (IBM companies established outside either the European	
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Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Trusted Payments**

(Treasury HUB, CBK, and all Services for the exchange of banking documents between companies or between companies and banks.)

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
AT&T GLOBAL NETWORK SERVICES ITALIA	VIA LIVORNO, 60 TORINO (TO) 10144, IT

SRL	
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCIOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT
TAS SpA	Via Del Lavoro, 47 CASALECCHIO DI RENO (BO) 40033, IT
ICCREA BANCA SpA Ist.Centrale Credito Cooperativo	VIA LUCREZIA ROMANA, 41/47 ROMA (RM) 00178, IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Trusted Logistics**

(Delivery Control and On Demand Logistics)

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT
M B M ITALIA SRL	VIA L. PELLIZZO, 14/A PADOVA (PD) 35128, IT

c.

IBM Data Importers (IBM companies)	
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established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
Name of IBM Data Importer	Address of IBM Data Importer
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Trusted Sign**

- **PEC**

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
AT&T GLOBAL NETWORK SERVICES ITALIA	VIA LIVORNO, 60 TORINO (TO) 10144, IT

SRL	
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
NAMIRIAL SpA	VIA CADUTI SUL LAVORO 4, SENIGALLIA (AN) 60019, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
STUDIO INFORMATICA S.r.l.	STRADONE FARNESE, 43/a, PIACENZA (PC) 29121, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

- PKI, digital certificates, remote digital signature, on-boarding services, video identification

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA DIMENSION DATA ITALIA S.p.A.	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
FASTWEB SPA	VIA CARACCIOLO, 51 MILANO (MI) 20155, IT
ITAGILE S.R.L	PIAZZA MARCONI 15 ROMA (RM) 00144, IT
INVENTIA S.r.l.	Via Antonio Fontanesi 4 Milano (MI) 20146, IT
INTESI GROUP SpA	VIA TORINO, 48 MILANO (MI) 20123, IT
INNOVERY SPA	VIA CRETA, 78 BRESCIA (BS) 25124, IT
LANTECH SOLUTIONS S.P.A	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
NAMIRIAL SpA	VIA CADUTI SUL LAVORO 4, SENIGALLIA (AN) 60019, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
SKEBBY - MOBILE SOLUTION S.r.l.	VIA MELZO 12 MILANO (MI) 20129, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT

AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

- **Graphometric Signature**

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCILO, 51 MILANO (MI) 20155, IT
KALYOS SRL	VIA DEI MESTIERI 15 CONCOREZZO (MB) 20863, IT
LANTECH SOLUTIONS S.P.A	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
NAMIRIAL SpA	VIA CADUTI SUL LAVORO 4, SENIGALLIA (AN) 60019, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the	
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European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Trusted Doc**

(Services of legal archiving and consultation of the documents stored)

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
ARCHIVIUM SRL	CORSO FRANCIA, 233 int. D RIVOLI (TO) 10098, IT
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
eGLUE SRL	Via degli Alpini, 34 Segrate (MI) 20090, IT

FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
S.D.M.	VIA DALMAZIA 31 ROMA (RM) 00198, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
Name of IBM Data Importer	Address of IBM Data Importer
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Trusted Invoice**

(Services of e-invoicing using special portals powered by In.Te.S.A. S.p.A or by means of paper mail or electronic mail services or also via connectors to the “Sistema di Interscambio statale” (SdI) for the invoicing to the Public Administration or in the private sector.)

a.

IBM companies located in the European Economic Area or countries considered by	
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the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
ABRAMO PRINTING & LOGISTICS SPA	LOCALITA' DIFESA, ZONA INDUSTRIALE, CARAFFA DI CATANZARO (CZ) 88050, IT
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A.	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
LEADERFORM SPA	Via Molina, 14SONA VR 37060 ITA
NEXIVE SpA	VIA GAUDENZIO FANTOLI, 6/3 MILANO MI 20138 ITA
O. & S.I. SRL	Via Goldoni, 27 CERRO MAGGIORE (MI) 20023 IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
REAL DOCUMENT SOLUTION SRL-DELIVERY TICINO ITALIA	VIA A. VILLA, 10 VILLASANTA (MB) 20852, IT
S.A.T.A. APPLICAZIONE TECNOLOGIE AVANZATE SRL	Via Notari, 103 MODENA (MO) 41126, IT
SKEBBY - MOBILE SOLUTION S.r.l.	VIA MELZO 12 MILANO (MI) 20129, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI)

	20123 IT
TECHEDGE SpA	VIA CALDERA, 21 MILANO (MI) 20153, IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **EDM/BPM**

(Documents management services and digital process management services)

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
ADIUTO NET SRL	VIA E. BERNARDI 1 RUBANO (PD) 36030, IT
AT&T GLOBAL NETWORK SERVICES ITALIA SRL	VIA LIVORNO, 60 TORINO (TO) 10144, IT
CALL & CALL HOLDING Spa	VIA MASSIMO GORKI 30/32 CINISELLO BALSAMO (MI) 20092, IT
COLT TECHNOLOGY SERVICES SpA	VIA SIMONE MARTINI, 127 ROMA (RM) 00142, IT
DIMENSION DATA ITALIA S.p.A.	Via G. Di Vittorio, 24 Peschiera Borromeo, (MI) 20068, IT
FASTWEB SPA	VIA CARACCILOLO, 51 MILANO (MI) 20155, IT
LANTECH SOLUTIONS S.P.A	Via Romolo Bitti n. 6 Milano (MI) 20125, IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
REAL DOCUMENT SOLUTION SRL-DELIVERY TICINO ITALIA	VIA A. VILLA, 10 VILLASANTA (MB) 20852, IT
TELECOM ITALIA SPA	PIAZZA DEGLI AFFARI, 2 MILANO (MI) 20123 IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM)	
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companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

- PEC Orchestrator, for managing and organising PEC mail boxes.

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
STUDIO INFORMATICA S.r.l.	STRADONE FARNESE, 43/a, PIACENZA (PC) 29121, IT

c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>

NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

▪ **Services partially or totally supplied on Cloud**

a.

IBM companies located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
IBM ITALIA SPA	CIRCONVALLAZIONE IDROSCALO, SEGRATE MILANO, 20090, IT

b.

Third Party Subprocessors located in the European Economic Area or countries considered by the European Commission to have adequate protection	
<u>Name of Subprocessor</u>	<u>Address of Subprocessor</u>
ADIUTO NET SRL	VIA E. BERNARDI 1 RUBANO (PD) 36030, IT
O.& S.I. SRL	Via Goldoni, 27 CERRO MAGGIORE (MI) 20023 IT
PRESENT SPA	STRADA DELLA CEBROSA 86 TORINO (TO) 10156 IT
S.A.T.A. APPLICAZIONE TECNOLOGIE AVANZATE SRL	Via Notari, 103 MODENA (MO) 41126, IT

STUDIO INFORMATICA S.r.l.	STRADONE FARNESE, 43/a, PIACENZA (PC) 29121, IT
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c.

IBM Data Importers (IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of IBM Data Importer</u>	<u>Address of IBM Data Importer</u>
NONE	

d.

Third Party Data Importer (non-IBM companies established outside either the European Economic Area or countries considered by the European Commission to have adequate protection)	
<u>Name of Third Party Data Importer</u>	<u>Country in which Third Party Data Importer is located</u>
NONE	

Intesa will attempt to notify Client of changes in Subprocessors within a reasonable time period.

2. International Data Transfer & EU Standard Contractual Clauses

The EU Standard Contractual Clauses, if any, are attached to the Contract.

7. Data Privacy Officer and Other Controllers

Client is responsible for providing complete, accurate and up-to-date information about (a) its Data Privacy Officer, if required by law to appoint one, and (b) each of their other Controllers (including any of their alternate or additional Data Privacy Officers). Client shall provide notice

to Intesa in writing of any changes in (a) Data Privacy Officers or (b) other Controllers within 30 days of any appointment or change.

3. Intesa Privacy Contact

The Intesa privacy contact can be contacted at privacy_dep@intesa.it

Attachment (1) to Data Processing Addendum Exhibit for GTS

Section 3: Technical & Organizational Measures

The technical and organizational measures (TOMs) set out in this document apply to the Intesa Data Processing Addendum, including any underlying applications, platforms, and infrastructure components operated and managed by Intesa in providing the Service (components), except where Client is responsible for security and privacy and otherwise specified in the relevant contract

1. Statement of Adherence to Privacy and Security Principles

Intesa will maintain and follow IT security policies and practices generally that are integral to Intesa's business and mandatory for all Intesa employees, including supplemental personnel. Intesa's policies have been created in consideration of internationally recognized security standards and guidelines, such as ISO 27002+-series practices, and other security and privacy management principles such as "Privacy by Design." Intesa will review its IT security policies at least annually, and amend such policies as Intesa deems reasonable to maintain protection of infrastructure services environments and the data processed therein.

Intesa will maintain and follow its standard mandatory employment verification requirements for all new hires, including supplemental employees. In accordance with Intesa internal process and procedures, these requirements will be periodically reviewed and include, but may not be limited to, criminal background checks, proof of identity validation, and additional checks as deemed necessary by Intesa.

Intesa employees will complete security and privacy education annually and certify each year that they will comply with IBM's ethical business conduct, confidentiality, and security policies, as set out in IBM's Business Conduct Guidelines. Additional policy and process training will be provided to persons granted administrative access to GTS service components that is specific to their role within Intesa's operation and support of the infrastructure or services engagement.

Intesa implements physical and environmental safeguards to protect the physical infrastructure it manages under infrastructure services or outsourcing agreements against environmental threats, both naturally occurring and man-made, such as excessive ambient temperature, fire, flood, humidity, theft, and vandalism.

Intesa has current policies and procedures to deal with suspected security and privacy breaches, and provides annual cybersecurity and privacy training to all employees on how to report security incidents involving Intesa employees, Intesa contractors, Intesa clients and Intesa assets. These incidents may include theft, threats, acts of violence and vandalism. Intesa will work closely with its clients during security breach incident investigation and reporting, to support the provision of information to the client's own customers and regulators.

Further policies and procedures that support the protection of data include such controls such as: documenting operating controls, having a systems change management process, creating resiliency and backup protocols, installing updated malware protection, and other procedures which are reviewed and updated as appropriate.

4. Detailed Technical Measures

In addition, specific technical measures to be performed or implemented by Intesa for this Service to help protect privacy and security of personal data are set out below.

Other measures which may be appropriate to protect privacy and security of the personal data processed by Intesa within the Service, but not set out below or elsewhere in the Agreement, must be provided or implemented by the Client.

Category	Short Name	Controls Requirement
Security Monitoring	Logging Requirements	System and event logs from systems that process PI must be copied to a system outside the control of the system administrator or operator whose activities are being logged.
Security Monitoring	Monitoring Requirements	Log monitoring tools shall be used to analyze logs from systems that process PI for suspicious behavior and send alerts.
Security Monitoring	Log Retention	Logs must be retained for the period required by applicable law.
Security Monitoring	File Integrity Monitoring	Implement file integrity monitoring to detect unauthorized alterations to system and configuration files on servers that process PI.
Security Testing and Configuration Management	System Configuration Management	Deploy system configuration management tools that will automatically enforce and redeploy configuration settings to systems that process PI at regularly scheduled intervals.
Security Testing and Configuration Management	Vulnerability Scans	Perform monthly vulnerability scans of systems that process PI. Scanners shall be updated regularly to detect for the latest vulnerabilities.

Security Testing and Configuration Management	Penetration Testing	Conduct external and internal penetration tests at least annually on systems that process PI. Note that this requirement is not satisfied through the use of automated security tests and must be performed by a penetration tester.
Security Testing and Configuration Management	Automated Port Scans	Perform automated port scans from the Internet on a regular basis of all servers that process PI against a defined baseline. Anomalies shall generate alerts and reviewed.
Security Testing and Configuration Management	Test Organizational Readiness	Perform “Red team” table-top exercises at least annually to test organizational readiness to identify and mitigate cyber-attacks.
Backup media and PI at Rest	Backup Media Reuse	Delete and remove all PI from backup storage devices in a manner such that the PI cannot be accessed or recreated, after device decommission and prior to re-use.
Data loss prevention	Screen Locks	Configure screen locks to restrict access to unattended workstations containing PI.
Data loss prevention	Network Data Loss Prevention	Implement network sensors to help detect and block attempts to exfiltrate PI from the network.
Data loss prevention	Data Access Restriction	Implement controls to prevent administrators from obtaining copies of PI processed on Intesa-managed systems.
Data loss prevention	Pseudonymization & Anonymization	Encourage the use of pseudonymization or anonymization of PI in operations.
Data loss prevention	USB Drive Restrictions	Implement technical controls that are designed to help prevent or detect and centrally report the unauthorized transfer of PI from workstations to USB drives or another external media.
Data loss prevention	Client Data Center Security	Locate systems that process PI at facilities with access restrictions designed to admit

		only authorized personnel.
Disaster Recovery	Backup Testing	Validate backup process integrity periodically by performing data restoration testing.
Disaster Recovery	Disaster Recovery	Implement disaster recovery capabilities that are designed to recover PI system functionality within an agreed timeframe, which must be based on an impact assessment. The recovery site and systems should have security measures in place at least as stringent as those in the primary site. It is recommended to conduct and document DR planning review.
Disaster Recovery	Data Backup	Backup systems daily that contain PI to encrypted storage media. At least one backup destination must not be continuously addressable through operating system calls.
Disaster Recovery	Backup Storage Offsite	Store PI backup media in a remote location, separate from production systems.
Network Management	Web Filtering	Deploy Web browsing filtering controls designed to block access to malicious Web sites from systems that process PI.
Network Management	Block Malicious IP	Implement controls designed to block network communications to and from systems that process PI with malicious IP addresses (black lists) or that permit access only with trusted sites (white lists).
Network Management	Network Intrusion Prevention	Implement network-based intrusion prevention system sensors on networks that process PI.
Network Management	Network Segmentation	Segment networks such that with systems that process PI are on separate logical networks or VLANs with firewall controls to permit traffic only to and from

		authorized sources.
Network Management	Encrypt Applications	Encrypt PI when in transit across any network.
Network Management	Host-Based Firewalls	Apply host-based firewalls or port filtering tools on systems that process PI, with a default deny rule that drops all traffic, except for those services and ports that are expressly allowed.
Network Management	Network Device Integrity	Revalidate firewall rules at least annually for devices that protect Intesa-managed client systems that process PI.
Threat Intelligence and Training	Security Awareness Training	Implement a mandatory annual security awareness program for employees.
Threat Intelligence and Training	Vendor Management	Implement a vendor management program for suppliers who process PI that is designed to ensure effective due diligence in the selection of a supplier, contract implementation, and ongoing oversight.
User ID Identity and Access Management	Individual Accountability	Implement appropriate controls to ensure individual accountability.
User ID Identity and Access Management	OS Account Lock-Out	Implement controls to block brute force password guessing attacks on applications running on systems that process PI. For example, lock out accounts after a defined number of failed login attempts
User ID Identity and Access Management	Revalidate Intesa User IDs	Annually revalidate the business need for Intesa User IDs and associated permissions with access to PI.
User ID Identity and Access Management	Application Automatic Logoff	Automatically log off users from systems that process PI after a defined period of inactivity.
User ID Identity and Access Management	Client ID Termination	Revoke access for Client user IDs with access to PI on Intesa-managed client systems in the shortest practical time after requirement for business need has ceased.

User ID Identity and Access Management	Access Limitation	Restrict access to PI in file systems, network shares, applications, and databases using access control lists on Intesa-managed systems to those individuals with a valid need for such access.
User ID Identity and Access Management	Network Access Encryption	Encrypt all network access to systems storing or processing PI (e.g., no clear text protocols such as HTTP, FTP, or Telnet may be used. Protocols such as RDP and VNC must be configured to use encryption.).
User ID Identity and Access Management	ID File Encryption	Encrypt or hash all authentication files on systems that process PI and require root or administrator privilege for access.
User ID Identity and Access Management	Revalidate User IDs	Annually revalidate the business need for User IDs and associated permissions with access to PI.
User ID Identity and Access Management	Application Password Length	Where multi-factor authentication is not supported, require long passwords (more than 14 characters), where technically supported, on User IDs with access to systems that process PI.
Patch Management	Patch Time Frames	Apply security patches to systems processing PI during regularly scheduled change windows. Change windows must be provided according to the following schedule: Internet-facing systems: At least once every 30 days Non-internet facing systems: At least once every 60 days
Patch Management	Intesa-managed Applications	Apply application and middleware patches to systems that process PI.
Patch Management	Software Support	Ensure all software versions in use (operating systems, applications, browsers, email clients, middleware, etc.)

		are currently supported by the relevant vendor.
Patch Management	Software Testing	Test new software (including patches, service packs and other updates) in a non-production environment prior to promotion to production.
Patch Management	Patch client-managed Applications	Apply patches to client-managed middleware and applications on systems that process PI.
Anti-virus/anti-malware/application whitelisting	Anti-Virus (systems)	Deploy anti-virus/anti-malware detection and prevention software on all Intesa managed servers that process PI. Such software shall receive regular reputation-based signature updates from a central infrastructure. Detected events shall be logged centrally.
Anti-virus/anti-malware/application whitelisting	Client Phishing Protection	Deploy network-based detection and prevention controls to help filter out email phishing and malware before it reaches an endpoint.
Anti-virus/anti-malware/application whitelisting	Application Whitelisting	Deploy application whitelisting on all workstations that process PI to help prevent such workstations from executing unauthorized software.
Incident Response	Incident Response	Maintain an information technology incident investigation and response capability sufficient to comply with applicable laws, including with regard to notification of data breaches.
Inventory Management	Inventory Software	Maintain an accurate inventory of software, including version and underlying operating system, on systems that process PI.