

**Privacy Notice pursuant to Articles 13 and 14 of EU Regulation no. 679/2016 (“GDPR”), national legislation (Legislative Decree no. 196 of 30 June 2003, as amended by Legislative Decree no. 101 of 10 August 2018) and the provision of the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) of 18 January 2007.**

Pursuant to Articles 13 and 14 of the GDPR, to national legislation (Legislative Decree no. 196 of 30 June 2003, as amended by Legislative Decree no. 101 of 10 August 2018 and subsequent amendments) and the provisions of the Italian Data Protection Authority as per the Provision of 18 January 2007 (Official Gazette no. 24 of 30 January 2007) (jointly, the “**Privacy Law**”), we hereby inform the assigned debtors and any of their guarantors indicated in the relevant contractual documentation regarding the processing of their personal data - meaning information that allows for their identification, even indirectly - and their rights.

**Data Controller and relevant contact details**

By virtue of the assignment pursuant to Article 7.1, paragraph 3 and, consequently, pursuant to Article 58 of the Consolidated Law on Banking (Testo Unico Bancario) of the contracts, assets, and legal relationships (the “**Legal Relationships**”) which took place on 30 May 2018 between Commerzbank Aktiengesellschaft on one side, and the Assignee, Borromini SPV S.r.l., on the other, the latter has become the autonomous Data Controller (hereinafter, the “**Controller**”).

The Data Controller is Borromini SPV S.r.l. located at via Alfieri, 1 - Conegliano (TV), reachable at the following address: Borromini.spv@pec.spv-services.eu.

**Data Protection Officer (DPO) and relevant contact details**

The Data Protection Officer (“**DPO**”) can be contacted at the following address: Borromini.privacy@prelios.com.

**Categories of personal data processed and categories of data subjects**

The Controller informs you that the personal data collected and processed include common data such as, by way of example but not limited to, personal identification, financial, and income data (hereinafter, “**Data**”) contained in the documents and computer records related to the Legal Relationships, concerning the assigned debtors and contractors and their respective eventual guarantors, successors, and assignees.

For the assigned debtors and any of their guarantors, it is specified that special categories of personal data (pursuant to Art. 9 GDPR) will not be collected or processed, such as, for example, data relating to their state of health, political and trade union opinions, and religious beliefs.

**Purposes of processing, legal basis, and retention period**

The Data will be processed by the Data Controller for the purpose of:

- (a) Managing, administering, collecting, and recovering Credits (management of securitization operations).  
**Legal basis:** the processing is carried out based on the performance of contractual measures, e.g., to fulfill the purposes related to the various activities pertaining to the securitization operation and the satisfaction of credits, pursuant to Art. 6.1, letter b) of the GDPR.  
**Retention period:** the Data are stored for the entire duration of the contractual relationship and, upon termination, for a maximum of 10 years.

- (b) Fulfilling the obligations provided for by the applicable legislation on anti-money laundering, Law 130/1999, transparency legislation, supervisory instructions, and any other applicable legislation (including sending the competent authorities any communication or report required from time to time by the laws, regulations, and instructions applicable to the Company or the credits).

**Legal basis:** the processing is carried out to comply with legal obligations pursuant to Art. 6.1, letter c) of the GDPR.

**Retention period:** the Data are stored for the entire duration provided for by the legislation and, at most, for 10 years.

- (c) Managing any disputes and judicial or extrajudicial proceedings that may arise during the life of the securitization operation.

**Legal basis:** where applicable, the processing is carried out on the basis of the legitimate interest of the Controller pursuant to Art. 6.1, letter f) of the GDPR.

**Retention period:** where applicable, the Data are stored for the duration of the judicial/extrajudicial proceeding and/or until the exhaustion of the terms for the feasibility of judicial protection and/or appeal actions.

- (d) Assessing the reliability and punctuality of debtors' payments.

**Legal basis:** legitimate interest of the Data Controller (Art. 6, par. 1, letter f, GDPR).

**Retention period:** the Data are stored until the termination of the contractual relationship. In any case, Personal Data will not be processed for a period of less than 10 years starting from the closure of the contractual relationship from which the Credits originate.

Once the retention periods indicated above have expired, the Data will be destroyed, deleted, or made anonymous in a manner compatible with the purpose for which the Data were initially collected, in compliance with Art. 6, par. 4 of the GDPR and in accordance with technical deletion and backup procedures.

### **Processing methods**

In relation to the indicated purposes, the processing of personal data takes place through manual, computer, and telematic tools with logic strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data.

### **Provision of Data**

The provision of Data for purposes a) and b) is mandatory. Failure to provide them would make it impossible to manage and follow up on the securitization operations.

The provision of Data for purpose c), where applicable, is necessary. You may object, unless there are compelling legitimate grounds to proceed with the processing that override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of a legal claim.

### **Recipients of the Data**

The Data may be communicated to subjects qualified as “autonomous controllers,” as they are external to the original processing carried out, and “data processors,” pursuant to Art. 28 of the GDPR, who will act on the basis of specific instructions from the Controller, whose activity is strictly connected or instrumental to the indicated purposes of the processing, including, in particular: (i) subjects in charge of treasury and payment services, for the performance of the services themselves; (ii) auditors and other legal, tax, and administrative consultants of the Assignee, for the consultancy provided by them; (iii) supervisory, tax, and stock exchange authorities where

applicable, in compliance with legal obligations; (iv) subjects in charge of debt collection; (v) lawyers and judicial authorities. The aforementioned subjects will use the Data in compliance with the Privacy Law.

The Data will be processed, in the capacity of data processor, by Prelios Credit Servicing S.p.A. (the “**Servicer**”). Assigned debtors and any of their guarantors may contact the aforementioned third parties to exercise the rights recognized to them by the Privacy Law: an updated list of the same will be available at the offices of the Controller and/or Prelios Credit Servicing S.p.A. (the “**Processor**”) indicated below.

The Data may be communicated to companies that manage databases established to assess credit risk, which can be consulted by many subjects (including credit information systems). By virtue of this communication, other credit institutions and financial companies will be able to know and evaluate the reliability and punctuality of payments (for example, the regular payment of installments) of the assigned debtors. Within the scope of the aforementioned credit information systems and databases, the Data will be processed through computer, telematic, and manual tools that guarantee the security and confidentiality of the same, even in the case of using distance communication techniques for the sole purposes indicated above.

### **Transfer of personal data**

The Data will not be transferred to countries outside the European Economic Area but to countries belonging to the European Union.

### **Rights of the data subjects**

Finally, please be informed that Articles 15 to 22 of the GDPR grant data subjects specific rights.

In particular, each data subject may (a) obtain confirmation of the existence of personal data concerning them and access to the Data; (b) obtain the update, rectification and, where there is an interest, the integration of the Data; (c) obtain erasure; (d) request the restriction of processing within the limits provided for by Art. 18 of the GDPR; (e) object at any time to the processing of personal data that has the legitimate interest of the Controller as its legal basis; (f) the right to data portability, i.e., the right to receive the personal data in a structured, commonly used, and machine-readable format and to transmit those data to another data controller; (g) the right not to be subject to automated decisions, i.e., the right to obtain from the Controller not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the Data Subject or significantly affect them, unless such decisions are necessary for the conclusion or performance of a contract or are based on the consent provided by the Data Subject.

The Controller reminds you that, where the response to requests has not been satisfactory or, in general, for any dispute relating to the processing of Personal Data, Data Subjects will have the right to contact and lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali - Personali <http://www.garanteprivacy.it/>) in the manners provided for by the applicable legislation.

Assigned debtors and any of their guarantors, successors, or assignees and other data subjects may contact Prelios Credit Servicing S.p.A., Via Valtellina 15/17, 20159 Milan, in its capacity as data processor and/or the registered office of the Company, for any further information and to exercise the rights provided for by Articles 15 to 22 of the GDPR, during the opening hours of every banking business day.

Furthermore, Data Subjects have the right—in the event they believe that the processing of Data by the Controller is carried out in violation of the Applicable Privacy Law—(i) to appeal in any other administrative or jurisdictional seat or (ii) to lodge a complaint with the Italian Data Protection Authority.

Data Subjects may contact the Controller at the offices where the contractual relationship arose for any further information and to exercise the aforementioned rights, reachable at the address: [Borromini.spv@pec.spv-services.eu](mailto:Borromini.spv@pec.spv-services.eu) , or the Servicer in its capacity as Data Processor designated by the Controller at the following PEC address: [precs.ri@pec.prelios.it](mailto:precs.ri@pec.prelios.it) and/or the email address of the Controller's DPO: [Borromini.privacy@prelios.com](mailto:Borromini.privacy@prelios.com).

Milan, 01/06/2026