



CUSTOMER INFORMATION

PURSUANT TO ARTICLES 13 AND 14 OF THE EU 2016/679 DATA PROTECTION REGULATION GENERAL DATA PROTECTION REGULATION ("GDPR")

Dear Client, the company **PRAEMIA REIM ITALY SGR S.P.A. - VIA PALESTRO 6 - 20121 MILAN - P. IVA 09273270968** (hereinafter "the Company"), as Data Controller, informs you pursuant to Article 13 Regulation (EU) No. 2016/679 (hereinafter "GDPR") that your data - in relation to the services offered by it (the "Services") - will be processed in the following manner and for the following purposes:

1. SUBJECTS INVOLVED IN THE PROCESSING (HOLDERS, AUTHORIZED AND RESPONSIBLE)

The data controller of the personal data disclosed is **PRAEMIA REIM ITALY SGR S.P.A.** in the person of the Administrator *pro tempore* legal representative.

The Owner has appointed Authorized, Responsible and Appointed Persons and Persons in Charge (provided for under Article 30 Privacy Code in the version still in force) of the processing.

Internal Authorizers and Distributors belong to the business areas that need to process data for the purposes outlined in this policy.

External Managers perform *outsourced* activities on behalf of the Owner.

Some external parties will process your data assuming-as per the Privacy Guarantor's guidance-the status of Autonomous Data Controllers.

2. CATEGORIES OF PERSONAL DATA

The personal data that the Company collects are personal biographical, contact and professional references: first name, last name, company, residence/domicile/location, e-mail, tax code and/or VAT number, telephone number and/or cell phone number, bank data; any data related to special issues that require staff attention.

3. PURPOSE AND LEGAL BASIS FOR PROCESSING

- a) The processing of your data is necessary for the performance of a contract to which you are a party or the execution of pre-contractual measures taken at your request (Art. 6(1)(b) GDPR), which, in this specific case, relate to services for the establishment and management of alternative and reserved mutual funds operating in the real estate and securities, credit and private equity sectors.
- b) The data collected, by virtue of the legitimate interest ex art. 6, par. 1, lett. f) GDPR, could be used to send communications, paper or electronic, of an informative and/or commercial nature inherent to the Holder in coherence with its corporate purpose.
- c) The data collected, subject to your consent ex art. 6, par. 1, lett. a) GDPR, could be used to send communications, paper or electronic, of an informative and/or commercial nature inherent to the Owner or the services offered by it in order to inform the Interested Party of further commercial offers.

4. NATURE OF PROVISION OF DATA, CONSEQUENCES OF REFUSAL OF PROCESSING

The provision of data for the purposes referred to in point 3a) is mandatory and therefore any refusal to provide it in whole or in part may result in the impossibility for the Data Controller to execute the contractual or extra-contractual service you have requested.

The provision of data for the purposes mentioned in 3c) is optional and, again, can be revoked at any time.

5. TREATMENTS PERFORMED AND MODALITIES

The processing of your personal data is carried out by means of the operations indicated in Article 4 No. 2) GDPR and namely: collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, deletion and destruction of data.

The processing of data will be carried out in automated and/or manual form by putting in place all appropriate technical and organizational measures to ensure a level of security appropriate to the risk as provided for in Article 32 GDPR and will be performed by the subjects indicated in the following article.

6. RECIPIENTS OF YOUR DATA - ACCESSIBILITY

Your data may be made accessible for the purposes mentioned in Section 3:

- A. to employees and collaborators of the Data Controller in their capacity as Data Processors and/or Data Trustees (appointed pursuant to Article 30 of the Privacy Code still in force) and/or system administrators;
- B. to the French parent company **PRAEMIA REIM FRANCE** for the reporting and accounting of the transactions carried out, and to some of the other group companies (i.e.: *Praemia REIM Luxembourg*; *Praemia REIM Germany*; etc.) for customer management and the pursuit of contractual purposes, including under specific *partnership* agreements;
- C. To natural or legal persons who:
 - o in compliance with the provisions of Art. 29 GDPR, perform *outsourced* activities on behalf of the Controller in their capacity as External Data Processors, belonging to the following categories:
 - Individuals involved in providing support services for the proper functioning of logical and physical networks (support management programs, maintenance of the computer system and telecommunications networks, etc.);
 - consultants and professionals (accountant, legal professionals, labor consultants, etc.);
 - Logistics and transportation service providers;
 - providers of other services;
 - o carry out activities independently in their capacity as Autonomous Data Controllers, belonging to the following categories (if any):
 - auditors;
 - Audit Board.

Data processing by the Data Processors will be based on specific written directives from the Data Controller aimed at ensuring compliance with privacy regulations and the adoption of appropriate security measures.

Data processing by Data Controllers does not involve written directives from the Data Controller but will, however, take place on the basis of autonomous choices in accordance with the GDPR.

The list of Data Processors and Autonomous Data Controllers is contained in the Data Controller's process management and data protection document kept at the registered office and can be consulted by express request forwarded to the contact details indicated in the contact data section.

7. THIRD PARTY RECIPIENTS OF YOUR DATA - PROVISION AND TRANSFER

In order to execute the contractual or non-contractual performance you have requested, the acquired data may be given to financial intermediaries and/or brokers the execution of orders on necessary financial instruments.

Data disclosed will not be further disclosed to third parties except for the purpose of fulfilling obligations under the laws (Public Bodies only in cases where this is required by law; Financial Administration, Judicial Administration etc.) or subject to inspection (Bank of Italy, Consob, Ministry of Economy and Finance).

Processed data will not be transferred to countries located outside the European Economic Area (EEA). If this happens **PRAEMIA REIM ITALY SGR S.P.A.** will:

- ensure that the country to which personal data are transferred has received an adequacy decision from the European Commission under Article 45 of the GDPR (for more information, see the following link: <https://www.cnil.fr/fr/la-protection-des-donnees-dans-le-monde>)

or

- conclude an agreement containing the standard data protection clauses adopted by the European Commission under Article 47 of the GDPR (for more information, see the following link: <https://www.cnil.fr/fr/les-clauses-contractuelles-types-de-la-commission-europeenne>).

8. MODE AND DURATION OF DATA RETENTION

All personal data provided will be processed in accordance with the principles of lawfulness, correctness, relevance and proportionality and only in the manner, computerized or telematic, strictly necessary to pursue the purposes described above.

Personal data handled in paper form are stored in the personal folders of each employee or collaborator and kept in locked files under lock and key outside working hours.

The personal data managed at the computerized level are resident in the memory of a server with a network connection (limited and closed network that can be consulted only by having access by typing in mandatory personal passwords).

Backup disks are also kept in a secure, locked location. These, and the additional protection measures activated by the Data Controller, are aimed at securing the data against the risk of unauthorized access or unauthorized processing, as well as from the risk of loss, alteration or destruction, even if only accidental, of the data.

The data will be processed for as long as necessary to fulfill the performance of the contractual service or pre-contractual measures requested by the Data Subject, unless specific legal regulations (tax, accounting

and security) or the legitimate interest of the Data Controller (art. 6, par. 1, lett. f) GDPR) provide for or allow a different deletion period. In case of litigation with the Data Subject and/or third parties, the data will be processed for as long as strictly necessary to exercise the protection of rights.

The Owner's legitimate interest in data retention is quantified on average as 24 months after the end of the contractual relationship or the provision of the services indicated in paragraph 3. This term has been calculated by processing statistical findings of aggregated, non-personal data regarding the usefulness, desirability or necessity of reuse of personal data even after the termination of contractual performance to facilitate the Data Subject in requesting or obtaining ancillary contractual services the new ones.

After that time, the data will be deleted.

9. PLACE OF STORAGE

The data collected by the Data Controller will be stored at the headquarters of **PRAEMIA REIM ITALY SGR S.P.A.** or in a digital space on Servers located in a datacenter at first-tier operator (in non-shared *housing* mode or *hosting* as required), characterized by the highest levels of certified IT security, physical and organizational security and therefore able to provide secure services in full compliance with the standards and regulations on the protection of data, information and IT infrastructure.

10. RIGHTS OF THE DATA SUBJECT

As a Data Subject, you have the rights set forth in Articles 15 et seq. GDPR, namely the possibility to:

- a) To obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data and the following information: - purposes of the processing; -categories of personal data concerned; -recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients in third countries or international organizations; -where possible, the intended retention period for the personal data or, if not possible, the criteria used to determine this period; -where the data are not collected from the data subject, all available information about their origin; -the existence of automated decision-making, including profiling and, at least in such cases, meaningful information about the logic used, as well as the importance and the expected consequences of such processing for the data subject;
- b) Obtain from the Data Controller the rectification of inaccurate personal data concerning him/her without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration;
- c) obtain from the Data Controller the erasure of personal data concerning him/her without undue delay, if any of the following reasons exist: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) the data subject withdraws the consent on which the processing is based in accordance with GDPR Article 6(1)(a) or Article 9(2)(a), and if there is no other legal basis for the processing; (c) the data subject objects to the processing pursuant to Article 21(1) and there is no overriding legitimate ground for processing, or objects to the processing pursuant to Article 21(2) (d) the personal data have been unlawfully processed; (e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject; (f) the personal data have been

collected in connection with the provision of services by the Data Controller referred to in Article 8(1).

- d) Obtain from the Data Controller the restriction of processing when one of the following occurs: *(a)* the data subject disputes the accuracy of the personal data, for the period necessary for the Data Controller to verify the accuracy of such personal data; *(b)* the processing is unlawful and the data subject objects to the deletion of the personal data and instead requests that its use be restricted; *(c)* although the Data Controller no longer needs the personal data for the purposes of the processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court; *(d)* the Data Subject has objected to the processing in accordance with Article 21(1), pending verification as to whether the Data Controller's legitimate grounds prevail over those of the Data Subject.
- e) to receive in a structured, commonly used and machine-readable format personal data concerning him or her that has been provided to a Data Controller and to transmit such data to another Data Controller without hindrance from the Data Controller to whom he or she has provided it if: *a)* the processing is based on or contractual; *b)* the processing is carried out by automated means. In exercising his or her rights with regard to data portability, the data subject has the right to obtain the direct transmission of personal data from one Data Controller to another, if technically feasible.
- f) object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her under Article 6(1)(e) or (f), including profiling on the basis of these provisions.
- g) Right not to be subjected to a decision based solely on automated processing, including profiling, that produces legal effects concerning him or her or that significantly affects him or her in a similar way.
- h) Right to file a complaint with a supervisory authority.

11. DATA PROTECTION OFFICER (DPO - DATA PROTECTION OFFICER)

Pursuant to Article 37 GDPR, the Controller has appointed a DPO/DPO who can be contacted for any clarification inherent to the Processing of Personal Data.

12. CONTACT INFORMATION

For any of your clarification needs or to exercise your rights under the previous article, you may write to the Data Controller **PRAEMIA REIM ITALY SGR S.P.A. - VIA PALESTRO 6 - 20121 MILAN** possibly also by sending an email to privacy.italy@praemiareim.it .