

## PERSONAL DATA PROCESSING AND PROTECTION POLICY – Prospect

### 1. Introduction

Pursuant to Arts. 13 and 14 of EU Regulation 2016/679, Finanziaria Internazionale Investments SGR S.p.A., as “**Data Controller**”, intends to provide certain information regarding the methods and purposes of processing the personal data of its Customers, including potential Customers, and in general the natural persons that represent them (the “**data subjects**”).

### 2. Data Controller and Data Protection Officer contact information

The Data Controller is Finanziaria Internazionale Investments SGR S.p.A. (or “**Finint SGR**” or simply the “**Company**”), Via Vittorio Alfieri, 1 - 31015, Conegliano (TV), company belonging to the to the Banca Finanziaria Internazionale S.p.A. Group (in brief, the “**Bank**”).

To ensure the best protection of the personal data collected, Finint SGR has appointed a Data Protection Officer, who may be contacted at the address: [dposgr@finint.com](mailto:dposgr@finint.com).

### 3. Purposes and legal basis

The personal data are processed for the following purposes:

ID	Purpose	Legal basis
a)	<i>Provision of services and performance of contracts:</i> Need to perform a contract to which you are party or carry out pre-contractual activities at your request. This need represents the legal basis that legitimises the resulting processing.	The legal basis that legitimises the processing derives from a <b>pre-contractual obligation</b> . Otherwise, it would be impossible for Finint SGR to establish the relationships.
b)	<i>Direct marketing:</i> Promotion and sale of products and services offered by the Company, including those with which Finint SGR has entered into a specific commercial agreement, as well as the performance of market research, carried out by personnel of the same Company or third parties appointed as Data Processors.	The legal basis that legitimises the resulting processing is <b>your consent</b> , which you are free to provide or not and which you may in any event revoke at any time. The provision of the data required for such purposes is not required and refusal to provide them will not have any negative consequence other than the impossibility of receiving commercial communications.
c)	<i>Communication of data to companies in the Banca Finanziaria Internazionale Group:</i> Sending, by Finint SGR, of your data to companies belonging to the Banca Finanziaria Internazionale Group for purposes of commercial information, market research, sending out of newsletters, invitations to events, contests or prize competitions or direct offers of their products or services	The legal basis that legitimises the resulting processing is <b>your consent</b> , which you are free to provide or not and which you may in any event revoke at any time. The provision of the data required for such purposes is not required and refusal to provide them will not have any negative consequence other than the impossibility of receiving commercial communications.
d)	<i>Communication of data to third parties:</i> Sending, by Finint SGR, of your data to third-party companies not included in the previous point for purposes of commercial information, market research, sending out of newsletters, invitations to events, contests or prize competitions or direct offers of their products or services.	The legal basis that legitimises the resulting processing is <b>your consent</b> , which you are free to provide or not and which you may in any event revoke at any time. The provision of the data required for such purposes is not required and refusal to provide them will not have any negative consequence other than the impossibility of receiving commercial communications.
e)	<i>Profiling:</i> Promotion and sale of “personalised” and “dedicated” products and services of Finint SGR, companies in the Banca Finanziaria Internazionale Group and/or third-party companies. This category includes products and services identified through the processing and analysis - including through use of automated techniques or systems (e.g., big data) - of information relating to preferences, habits or consumption decisions, aimed at breaking down the data subjects into uniform groups in terms of specific behaviours or characteristics (customer profiling) and implemented by enhancing data with information acquired from third parties (enhancement).	The legal basis that legitimises the resulting processing is <b>your consent</b> , which you are free to provide or not and which you may in any event revoke at any time. The provision of the data required for such purposes is not required and refusal to provide them will not have any negative consequence other than the impossibility of receiving commercial communications.

### 4. Categories of data processed

4.1 The personal data that Finint SGR processes includes, for example but not limited to:

- **identifying and personal information** collected as part of the relationship:
  - name, surname, place and date of birth, residence, contact information (e.g., mobile phone number, address or email or certified email address);
  - tax data: tax code/VAT number, property regime;
  - information on education (e.g., level of education) and employment (e.g., profession and business segment, remuneration, years of work, etc.);
  - data relating to identity documents (e.g., number, place, date of issue and issuing entity).
- **Videos:**
  - images captured by the video surveillance systems installed by the Bank to protect the security of people and property and to protect assets.

4.2 Finint SGR do not process **special categories of personal data** of its customers (which can reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation).

## 5. Data processing methods

Personal data are processed by means of the operations specified in Art. 4, no. 2) of the GDPR Regulation, namely: data collection, recording, organisation, storage, consultation, processing, alteration, selection, extraction, comparison, use, restriction, disclosure, erasure and destruction. The personal data will be processed in both hard copy and electronic and/or automated form.

With reference to this last case, please note that for the promotion and sale of “customized” and “dedicated” services, when necessary, Finint SGR will take decisions based solely on automated data processing (including profiling) in order to divide Data subjects into homogeneous groups.

## 6. Personal data recipients or categories of recipients

6.1 The personal data collected may be disclosed to/shared with:

- third parties, suppliers of products and/or services, such as IT service companies, companies that handle data entry, storage and archiving of documentation relating to the services provided, advisory companies, independent professionals, auditing firms, debt collection companies;
- third parties with which commercial agreements have been entered into for the purposes set forth in Section 3, points b) and c);
- parties to which the disclosure may be made, when necessary to meet obligations deriving from a contract to which the data subject is party or to fulfil specific requests of the data subject prior to the conclusion of the contract (e.g., execution of company registration reports, custodian bank, etc.).

6.2 A detailed list of the parties to which the data may be disclosed, who act as Autonomous Data Controllers or Data Processors, may be consulted at Finint SGR.

6.3 Within the internal organisation of Finint SGR, your data may also be seen by employees, temporary workers and interns in their capacity as data processors.

## 7. Transfer of data to third countries

Finint SGR hereby informs you that your personal data may also be transferred to countries outside the European Union or the European Economic Area (“Third Countries”) recognised by the European Commission as having an appropriate level of personal data protection or, otherwise, only if an appropriate level of personal data protection with respect to that of the European Union is contractually guaranteed by all service providers located in the Third Country (e.g., by signing the standard contractual clauses provided by the European Commission) and that the right of Data Subjects to exercise their rights is always guaranteed.

## 8. Data storage periods

The personal data of potential customers, with reference to purposes b), c), d) and e) will be stored for a period of 24 months starting from the date of the most recent update of the information obtained from you.

With reference to the purposes mentioned above, for customers as well as potential customers, Finint SGR will respect what is set forth in the Public Register of Oppositions (Italian Presidential Decree No. 26 of 27 January 2022).

At the end of the applicable storage period, the personal data referring to Data Subjects will be erased or stored in a form that does not allow for the Data Subject to be identified (e.g., irreversible anonymisation), unless further processing is required for one or more of the following reasons: i) resolution of pre-dispute procedures and/or disputes initiated prior to the end of the storage period; ii) performance of investigations/inspections by internal control functions and/or external authorities initiated prior to the end of the storage period; iii) to respond to requests from Italian and/or foreign public authorities received by/sent to Finint SGR prior to the end of the storage period.

## 9. Rights of the data subject

Pursuant to Articles 15-22, the Regulation grants you the option to exercise specific rights.

In your capacity as Data Subject, you may exercise the rights set forth in the Regulation and listed below at any time with respect to the Data Controller by sending a specific request in writing to the email address of the Data Protection Officer [dposgr@finint.com](mailto:dposgr@finint.com) or by post or registered letter or electronically to the address Finanziaria Internazionale Investments SGR S.p.A. - Via Vittorio Alfieri, 1 - 31015, Conegliano (TV) – To the kind attention of the Data Protection Officer.

In particular, you may obtain:

- confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to such data;
- the rectification of inaccurate personal data and the completion of incomplete personal data;
- the erasure of personal data concerning you in cases in which this is permitted by the Regulation;
- restriction of processing, in the cases set forth by the Regulation;
- the communication, to the recipients to which the personal data have been transmitted, of requests for rectification/erasure of personal data and the restriction of processing received from the Data Subject, unless this proves impossible or involves disproportionate effort;
- the receipt of the personal data provided to the Data Controller in a structured, commonly used and machine-readable format and the transmission of those data to another controller at any time, including when any relationships with the Data Controller are discontinued;
- the objection at any time to the processing of personal data concerning you: in those cases, the Data Controller is required to refrain from all further processing, without prejudice to the cases permitted by the Regulation;
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless this decision:
  - a) is necessary for entering into, or performance of, a contract between the Data Subject and the Data Controller;
  - b) is authorised by Union or Member State law to which the Controller is subject;
  - c) is based on the Data Subject's explicit consent.

In the cases pursuant to letters a) and c) above, you are entitled to obtain human intervention on the part of the Data Controller, to express your point of view and to contest the decision.

The deadline for the response is one (1) month, which may be extended by two (2) months in particularly complex cases; in these cases, Finint SGR provides at least one interim communication within one (1) month.

The exercise of rights is free in principle; Finint SGR reserves the right to request a contribution in the case of clearly unfounded or excessive (also repeated) requests. Finint SGR is entitled to request the information needed to identify the requesting party.

The Data Subject is also entitled to submit a complaint to the Personal Data Protection Authority. The contact information of the Personal Data Protection Authority may be consulted on the website <http://www.garanteprivacy.it>.

**Sender**

Surname and Name:

\_\_\_\_\_

Address:

\_\_\_\_\_

Place and Date:

\_\_\_\_\_

To

**FINANZIARIA INTERNAZIONALE INVESTMENTS SGR S.P.A.**

**Consent for personal data processing**

Taking into account the Policy provided to me/us pursuant to Art. 13 and 14 of the Regulation, I/we acknowledge the processing of my/our Personal Data carried out for the purposes described in the Policy in Section 3 "Purposes and legal basis" and that I/we am/are aware of the rights described therein. In particular:

- A) with reference to the processing by Finint SGR of my/our data for direct marketing purposes (section 3, letter b):  
I/we express consent

YES

NO

- B) with reference to the processing by Finint SGR of my/our data for Data communication to companies belonging to the Banca Finanziaria Internazionale Group (section 3, letter c):  
I/we express consent

YES

NO

- C) with reference to the processing by Finint SGR of my/our data for Data communication to third-party companies not included in the previous point (section 3, letter d):  
I/we express consent

YES

NO

- D) with reference to the processing by Finint SGR of my/our data for profiling offers of "personalised" products and services (section 3, letter e):  
I/we express consent

YES

NO

Signature for acknowledgement:

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