PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Pursuant to Regulation (EU) 2016/679, the General Data Protection Regulation (the "GDPR"), Anima SGR S.p.A. (hereinafter the "Company"), in its capacity as Data Controller, is required to provide you with information concerning the use of your personal data.

The Company has appointed a Data Protection Officer ("DPO") pursuant to the GDPR, who may be contacted at dpo@animasgr.it.dpo@animasgr.it

This Privacy Notice also covers the processing carried out by persons or entities performing the technical and organisational tasks described in Section 1 on behalf of the Company.

1. Purposes and methods of processing. Whether the provision of data is mandatory.

The personal data held by the Company are provided directly by the person to whom they relate (the "Data Subject"). Personal data may also be collected by the Company in the course of its business activities or obtained from third parties (e.g. placement agents, banks and other financial intermediaries). To identify and verify the identity of any beneficial owner in accordance with legislation on the prevention of money laundering and terrorist financing (Legislative Decree No. 231/2007 and implementing provisions), the Company may request relevant information from the Data Subject or obtain the beneficial owner's personal data directly (by consulting publicly accessible registers, lists, deeds and documents) or through entities entrusted with distribution activities.

Personal data are processed in the ordinary course of the Company's business for the following purposes:

a) purposes strictly connected with and instrumental to portfolio management and the related management of client relationships (e.g. collecting information prior to entering into a contract, carrying out transactions in fulfilment of obligations under contracts entered into with clients, reviewing and assessing the results and performance of client relationships and the associated risks, etc.).

The provision of personal data for these purposes is not mandatory. However, depending on the relationship between the data requested and the service concerned, failure to provide such data may prevent the Company from providing the service. Such processing does not require your consent;

b) compliance with obligations imposed by laws, regulations or EU legislation (e.g. customer and beneficial owner due diligence obligations, disclosure of Data Subject information as required by anti-money laundering and counter-terrorist financing provisions, or requirements imposed by Supervisory Authorities). The provision of personal data for these purposes is mandatory and the related processing does not require your consent;

c) other purposes related to the Company's business activities, including:

- assessing client satisfaction with the quality of the services provided and the activities carried out by the Company, including through specialised firms, by means of face-to-face or telephone interviews, questionnaires, etc.;
- promoting and selling products and services of the Company or third parties by letter, telephone, advertising material, automated communication systems and profiling based on investment preferences;
- using tracking tools (so-called tracking pixels) in promotional communications sent by email, enabling information to be collected concerning recipients' interactions with messages, such as whether a message has been opened, the date and time it was viewed and any interactions with its content, in order to assess communication effectiveness and improve the Company's commercial initiatives;

- conducting studies and market research by means of face-to-face or telephone interviews, questionnaires and distribution of information concerning products and services offered by the Company, including by processing personal data relating to investment preferences.

The provision of data for the purposes set out in point (c) above is voluntary and the related processing requires your consent.

For the purposes described above, personal data are processed manually or using electronic or other automated means, in accordance with procedures strictly related to those purposes and in any event in a manner that safeguards the confidentiality and security of personal data (particularly where remote communication technologies are used).

Use of tracking tools in marketing communications sent by email.

When sending promotional communications by email, the Company may use tracking tools (so-called tracking pixels), i.e. technical elements embedded in messages which, when displayed, may allow the Company to detect whether a message has been opened, the date and time of opening and, depending on the technologies used, technical information such as the IP address and the characteristics of the device or email application used. Where associated with an identified recipient, these data may be processed to measure campaign effectiveness and improve promotional communications.

The use of these tools for the purposes described above is covered by any consent given by the Data Subject for direct marketing activities, on the basis of the information provided in this Privacy Notice. Consent is optional and refusal to give it does not affect access to the Company's services.

The Data Subject may withdraw consent to direct marketing at any time or selectively withdraw consent solely to the use of tracking tools (so-called tracking pixels), in which case the Data Subject may continue receiving promotional communications without tracking. To this end, the Data Subject may manage their preferences using the dedicated link at the bottom of each promotional email, which allows them either to withdraw marketing consent or to disable tracking tools only. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

For certain services, the Company engages trusted companies which, acting as Data Processors, perform technical or organisational tasks, including printing, enveloping, sending, transporting and sorting client communications; providing IT services for the supply, development and maintenance of software and hardware systems necessary for or otherwise supporting the services provided by the Company; assessing client satisfaction or needs; banking and financial intermediation activities; and statutory auditing.

2. Categories of personal data processed

The Company and other persons or entities performing the tasks described in Section 1 on its behalf or for its benefit process personal data such as: name, address and other personal identification details; Italian tax identification number; bank account identifiers (e.g. IBAN); information concerning family and personal circumstances; and information concerning the Data Subject's education and occupation. In providing the services and performing the activities described in this Privacy Notice, the Company does not need to process personal data falling within the "special categories" referred to in Article 9 of the GDPR (such as data revealing health status, political opinions, trade union membership or religious beliefs). You are therefore requested not to disclose such data to the Company. However, if the Company needs to process special category data in the course of its activities, it will provide you with a new, specific privacy notice together with a request for specific consent to such processing.

3. Categories of recipients to whom data may be disclosed or who may access data as processors or persons authorised to process personal data.

To pursue the purposes described in Section 1, the Company needs to disclose your personal data to third parties belonging to the following categories:

- persons or entities performing the technical or organisational tasks referred to in Section 1 on behalf of the Company, including its statutory auditors;

- placement agents and any other persons or entities identified in the contractual documentation;

- banking and financial intermediaries, in order to execute your instructions and settle payments due under contracts entered into by you;

- Supervisory Authorities and bodies, Judicial Authorities and, more generally, public or private entities exercising functions of public interest (including, for example, the Bank of Italy, CONSOB and the Italian Financial Intelligence Unit (UIF));

- external companies and/or professionals engaged by the Company to provide assistance and advisory services;

The recipients of the disclosures described in this Privacy Notice operate independently as separate Data Controllers or, in certain cases, have been appointed by the Company as Data Processors. An up-to-date list is available from the Company.

Certain categories of persons authorised to process personal data may access your personal data to perform their assigned duties. In particular, the Company has authorised its employees, including system administrators, temporary agency workers and interns, to process client personal data to the extent necessary for their respective duties.

Persons or entities appointed by the Company as Data Processors may also access your personal data in the performance of their assigned tasks. Information regarding the identity of Data Processors appointed by the Company may be obtained as described in Section 5 below.

Personal data processed by the Company and by persons or entities carrying out the technical and organisational tasks described in Section 1 on its behalf are not made publicly available.

Solely to improve the performance of existing contractual relationships, personal data may also be processed by collaborators or partners established outside the European Union who have been appointed as Data Processors and are required to comply with applicable data protection laws (including Regulation (EU) 2016/679 and implementing provisions issued by the Italian Data Protection Authority), on the basis of either (i) an adequacy decision adopted by the competent authority or (ii) a specific agreement drawn up in accordance with standard contractual clauses, as envisaged by Article 46 of Regulation (EU) 2016/679, which permits transfers of personal data to third countries where appropriate safeguards protect the confidentiality of Data Subjects' personal data, including contractual clauses between the controller or processor and the controller, processor or recipient in the third country or international organisation.

4. Retention periods for personal data.

Personal data will be processed throughout the duration of the contractual relationships established and thereafter to fulfil all applicable legal obligations, in any case for no longer than 10 years following termination of the contractual relationship, unless a longer period is expressly required by law.

5. Data Subject rights under Articles 15 et seq. of Regulation (EU) 2016/679.

Data protection legislation grants Data Subjects specific rights. In particular, each Data Subject has:

a) the right of access under Article 15 of the GDPR, namely the right to obtain access to personal information concerning them;

b) the right to rectification under Article 16 of the GDPR, namely the right to have inaccurate personal data concerning them corrected without undue delay;

c) the right to erasure (the "right to be forgotten") under Article 17 of the GDPR, namely the right to have personal data concerning them erased;

d) the right to restriction of processing where one of the circumstances specified in Article 18 of the GDPR applies;

e) the right to data portability under Article 20 of the GDPR, namely the right to receive their personal data in an interoperable format and/or to have such data transmitted to another Data Controller without hindrance from the Company;

f) the right to withdraw consent at any time under Article 7 of the GDPR. With regard to promotional communications sent by email, the Data Subject may at any time selectively withdraw consent to the use of tracking tools (so-called tracking pixels), without affecting the consent given to receive marketing communications, by using the dedicated link at the bottom of each email, which allows the relevant preferences to be managed separately;

g) the right to lodge a complaint with the Italian Data Protection Authority in the event of a breach involving the processing of personal data, pursuant to Article 77 of the GDPR;

h) the right to an effective judicial remedy in the event of unlawful processing of personal data, including against decisions of the Italian Data Protection Authority, pursuant to Article 78 of the GDPR;

i) the right to object at any time to processing for the purpose of sending commercial communications, advertising material or direct marketing, by emailing privacy@animasgr.it and expressly requesting removal of their name from the marketing list.

6. Data Controller and Data Processors.

The Data Controller responsible for the processing of personal data covered by this Privacy Notice is Anima SGR S.p.A., registered in the register maintained by the Bank of Italy under No. 8 in the UCITS Managers Section and No. 6 in the AIF Managers Section, and a member of the National Guarantee Fund, with registered office at Corso Garibaldi 99, 20121 Milan, Italy. Toll-free number: 800.388.876.

Requests to exercise the rights described above may be submitted in writing or by email to privacy@animasgr.it.

Requests concerning the identity of Data Processors appointed by Anima SGR S.p.A., as well as requests referred to in Section 5 above, may also be made orally. The complete list of Data Processors appointed by the Company may be requested by emailing privacy@animasgr.it.privacy@animasgr.it

The Data Controller
Anima SGR S.p.A.