

PRIVACY NOTICE PURSUANT TO ART. 13 OF EU REGULATION 2016/679

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

The Company has appointed the "Data Protection Officer" (so-called "DPO") required by the Regulations, who can be contacted at the following e-mail address: dpo@animasgr.it

This information also refers to the processing carried out by persons who perform, on behalf of the Company, the technical and organisational tasks described in paragraph 1.

1. Data processing ends and modalities

The personal data in the possession of the Company are provided directly by the person to whom the personal data refer ("Data Subjects "). Personal data may also be acquired by the Company in the exercise of its activity or by third parties (e.g. banks and other financial intermediaries, etc.). In order to identify and verify the identity of any beneficial owner, pursuant to the legislation against money laundering and terrorist financing (Legislative Decree 231/07 and implementing regulations), the Company may ask the Data Subject party for relevant information or acquire the personal data of the beneficial owner directly (through the use of public registers, lists, deeds, documents known by anyone) or through the persons in charge of distribution.

Personal data are processed within the normal activity of the Company for the following purposes:

a) purposes strictly connected and instrumental to the management of relations with the Data Subject.

The provision of personal data necessary for these purposes is not mandatory, but the refusal to provide them may involve - in relation to the relationship between the data and the service requested - the inability of the Company to provide the service itself. Their treatment does not require the consent of the Data Subject;

b) fulfillment of obligations imposed by laws, regulations or Community legislation (e.g.: obligations of adequate verification of customers and the beneficial owner, communication of information of the Data Subject party in accordance with the provisions on the prevention of money laundering and combating the financing of terrorism, or by provisions of the Supervisory Authorities).

The provision of personal data necessary for these purposes is mandatory and its processing does not require the consent of the Data Subject;

c) other purposes functional to the activity of the Company such as:

- measuring the degree of customer satisfaction with the quality of the services rendered and with the activities carried out by the Company, carried out, also through specialised companies, through personal or telephone interviews, questionnaires, etc.,
- the promotion and sale of products and services of the Company or third party companies, carried out through letters, telephone, advertising material, automated communication systems, telematic profiling under investment preferences;

ANIMA Sgr S.p.A.

Società di gestione del risparmio soggetta all'attività di direzione e coordinamento del socio unico Anima Holding S.p.A.

Corso Garibaldi 99 - 20121 Milano - Tel +39 02 806381 - Fax +39 02 80638222 - www.animasgr.it

Cod. Fisc./P.IVA e Reg. Imprese di Milano n. 07507200157 - Capitale Sociale euro 23.793.000 int. vers.

R.E.A. di Milano n. 1162082 - Albo tenuto dalla Banca d'Italia n. 8 Sezione dei Gestori di OICVM e n. 6 Sezione dei Gestori di FIA - Aderente al Fondo Nazionale di Garanzia

- the processing of studies and market research, carried out through personal or telephone interviews, questionnaires, sending of information material on products and services provided by the Company, including through the processing of personal data profiling under investment preferences.

The provision of the necessary data for the purposes referred to in letter c) above is not compulsory and their treatment requires the consent of the Data Subject.

In relation to the purposes described above, the processing of personal data is carried out by means of manual processing or electronic or automated tools, according to logic strictly related to the purposes themselves and in any case in such a way as to ensure the confidentiality and security of personal data.

For some services, the Company avails itself of trusted companies which, as data processors, carry out technical or organisational tasks, such as: the provision of printing, enveloping, transmission, transport and sorting of communications services; the provision of IT services relating to the supply, development and maintenance of software and hardware systems necessary or in any case functional to the performance of the services provided by the Company, the survey of the degree of satisfaction or needs of customers; the activity of banking and financial intermediation; the activity of auditing and certification of financial statements.

2. Processing of special categories of personal data

In relation to the purposes described in paragraph 1 above, the Company and the other subjects who perform, on its behalf or for its benefit, the tasks described in paragraph 1 above, process personal data relating to: name / name, address and other elements of personal identification; tax code; identification details of banking relationships (eg IBAN); data relating to family and personal situations, data relating to the degree of education and employment of the Data Subject and, for companies, the personal data of the legal representative / attorney.

In providing the services and activities indicated in this information notice, the Company does not need to process personal data that art. 9 of the aforementioned Regulation defines as "particular", (such as, for example, personal data disclosing health, political and trade union opinions, religious beliefs, etc.).

3. Categories of persons to whom the data may be communicated or who may learn about them as data processors or persons in charge of processing.

For the pursuit of the purposes described in paragraph 1, the Company needs to communicate the personal data of the interested party to third parties belonging to the following categories:

- persons who perform, on behalf of the Company, the technical or organisational tasks indicated in paragraph 1, including the independent auditors;
- banking and financial intermediaries, including the Custodian Bank, in order to carry out the instructions given and regulate the fees provided for in the contracts entered into;
- Supervisory Authorities and Bodies, Judicial Authorities and, in general, public or private subjects with functions of public importance (such as, for example, Bank of Italy, Consob, etc.);
- companies and/or external professionals of which the Company avails itself in the context of assistance and consultancy relationships;



- third party companies for processing aimed at promotional initiatives, where the Data Subject has given its consent.

The recipients of the communications described in this information notice operate in total autonomy, as separate data controllers, or, in some cases, have been designated by the Company as data controllers. Their list, which is constantly updated, is available from the Company.

Certain categories of persons, in their capacity as data processors, may have access to customers' personal data for the purpose of fulfilling the tasks assigned to them. In particular, the Company has designated, as persons in charge of processing customer data, the employees of the Company, including system administrators, for the performance of their duties, temporary employees used by the Company, interns.

Personal data may also be disclosed, on the occasion of the performance of the tasks assigned to them, to persons designated by the Company as data processors. The identity of the data processors designated by the Company may be known in the manner indicated in paragraph 6 below.

Personal data processed by the Company and by persons who perform the technical and organisational tasks described in paragraph 1 on its behalf shall not be disclosed.

For the sole purpose of a better execution of the existing contractual relationship, personal data may also be processed by collaborators/partners established in non-EU territory identified as being responsible for the processing of personal data and required to comply with current privacy legislation (i.e. EU Regulation 2016/679 implementing measures of the Guarantor) by virtue of either (i) a decision of adequacy adopted by the Guarantor or (ii) a specific contract - drawn up in accordance with the contractual clauses model prepared by the Guarantor - as provided for in 'art. 46, paragraph 3, letter a) of Regulation EU 2016/679 where the transfer of personal data to third countries is permitted against the existence of adequate guarantees for the protection of the confidentiality of the Data Subject's data, such as "contractual clauses between the data controller or the data controller and the data controller, the data controller or the recipient of the personal data in the third country or international organisation".

4. Terms of retention of personal data.

Personal data will be processed for the entire duration of the contractual relationship established, and even afterwards, for the performance of all legal obligations and in any case for a period not exceeding 10 years from the termination of the contractual relationship or beyond in cases expressly required by law.

5. Rights of Data Subjects referred to in Articles 15 et seq. of EU Regulation 2016/679

Please note that the legislation on the protection of personal data gives the interested parties the opportunity to exercise specific rights. In particular, each Data Subjects has:

- a) the right of access, expressly provided for by art. 15 of EU Regulation 2016/679, i.e. the possibility to access all personal information concerning him/her;
- b) the right of rectification, expressly provided for in art. 16 of EU Regulation 2016/679, i.e. the possibility of obtaining the updating of inaccurate personal data concerning him without justified delay;

- c) the right to be forgotten, expressly provided for in art. 17 of EU Regulation 2016/679, consisting of the right to the deletion of personal data concerning the Data Subjects concerned;
- d) the right to limit processing when one of the hypotheses provided for by art. 18 of EU Regulation 2016/679 applies;
- e) the right to data portability, expressly provided for by art. 20 of EU Regulation 2016/679, i.e. the right to obtain one's own data in an interoperable format and/or the right to have one's own personal data transmitted to another data controller without hindrance by this Company;
- f) the right to revoke consent at any time, expressly provided for in art. 7 of EU Regulation 2016/679;
- g) the right to complain to the Guarantor in case of violation in the processing of data pursuant to art. 77 of EU Regulation 2016/679;
- h) the right to appeal to the courts in the event of unlawful processing of data, including against the acts taken by the Guarantor pursuant to Article 78 of EU Regulation 2016/679;
- i) the right to object at any time to the processing of data for sending commercial communications and advertising materials or direct selling, by sending an email to 'address privacy@animasgr.it.', expressly requesting the cancellation of their names from the advertising list.

6. Data controller and data processors.

The controller of the personal data processing is Anima SGR S.p.A., with registered office in Corso Garibaldi 99, 20121 Milan - Tel. 800.388.876.

Claims relating to the exercise of the rights recognised by EU Regulation 2016/679 may also be submitted in writing by e-mail to the following address: privacy@animasgr.it.

Requests relating to the identity of the data processors appointed by Anima SGR S.p.A. and the requests referred to in paragraph 5 above may also be made orally. The complete list of the Managers appointed by the Company may be requested by e-mail sent to privacy@animasgr.it.