

INFORMATION REGARDING DATA PROCESSING

Pursuant to articles 13 and 14 of EU Regulation n. 2016/679 on the protection of personal data (hereinafter the "**Regulation**"), InvestiRE SGR S.p.A. as Data Controller (hereinafter "**InvestiRE**" or the "**Company**" or the "**Controller**"), provides the following information to the Data Subject (hereinafter the "**Data Subject**") in connection with the processing of personal data relating to the appointment as a member of the Advisory Committee (the "**Appointment**") of a closed reserved real estate investment fund (hereinafter referred to as the "**Fund**"), managed by the Company, and with the handling of the relationship related to the assignment given and the activities carried out as a member of the Committee.

1. Purpose of the processing

The personal data, better indicated in point 2 below, is processed by the Company for the following purposes:

- a) performance of activities preparatory and necessary to the Appointment, management of the related relationship and fulfillment of contractual obligations arising from the Appointment;
- b) fulfillment of legal obligations to which the Company is subject; in particular, reference is made to the requirements contained in the Regulation on Collective Asset Management of Bank of Italy and the Regulations for the Management of the Fund, as well as art. 13 Legislative Decree 58/1998, Italian Ministerial Decree 468/1998, art. 2-octies, paragraph 3, lett. c), Legislative Decree 196/2003 ("**Privacy Code**"), civil, tax and accounting regulations and the applicable provisions of the Supervisory Authorities;
- c) performance of administrative, accounting, organizational and technical activities concerning the management of the Appointment and any acts connected and/or related thereto;
- d) exercise or defence of legal claims in court and activities related to litigation management in the event of disputes or controversies.

For the above-mentioned purposes, the processing of personal data is necessary for the performance of contractual obligations arising from the Appointment, as well

as for the fulfillment of obligations under the above-mentioned regulations and for the pursuit of the legitimate interests of the Controller.

The processing of any data relating to criminal convictions or offenses is necessary for the check and assessment of the requirements of honorability, subjective requirements and grounds for disqualification provided for by the reference regulations (art. 2-octies, paragraph 3, letter c), of the Privacy Code, art. 13 Legislative Decree 58/1998, Italian Ministerial Decree 468/1998).

2. Source and categories of data being processed

A) Source from which personal data originates

For the above-mentioned purposes, the personal data, which are subject to processing, are directly provided by the Data Subject or are also acquired from third parties, such as, for example, public registers, lists, public documents that are accessible to anyone under the law (such as the register of companies at the chambers of commerce), also through companies authorised to do so.

B) Categories of data processed

In relation to the purposes indicated in point 1 above, the Company processes the following personal data of the Data Subject: first name, last name, date of birth and place of birth, tax code, residence address, e-mail address, telephone contact, any domicile, other information contained in the identity document, in any certifications provided (certificate of residence, etc.), data relating to qualifications or positions held in a company or entity, other accounting and administrative information closely related to the Appointment, any data relating to criminal convictions and offenses where acquired as part of the checks of the requirements of honorability under the above-mentioned rules.

Personal data shall hereinafter be collectively referred to as “Data”.

3. Nature of the provision of data

The provision of the Data is compulsory or in any case necessary for the pursuit of all the purposes set forth in point 1 above, and any refusal of the Data Subject to provide such Data will result in the impossibility of fulfilling the Appointment.

4. Methods of processing and Data retention period

The processing of the Data Subject's Data shall be carried out with instruments and procedures suitable to guarantee their security and confidentiality in compliance with the law and may be carried out both on paper and with the aid of computer



procedures and means (e.g. databases) suitable to store, manage and process the Data themselves with reasons strictly related to the above-mentioned purposes.

Data is not subjected to automated decision making.

In view of a correct management of the Data received, the Data Subject shall promptly notify the Company of any corrections, additions and/or updates to the Data previously provided.

The Controller will process the Data Subject's Data for the duration of the contractual relationship arising from the Appointment and, upon its termination, for the time provided for by the regulations in force for administrative, accounting and tax purposes (generally 10 years).

5. Categories of subjects to whom the Data may be communicated or who may be made aware of it and the scope of dissemination thereof

Certain categories of employees of the Company, as internal referents and persons in charge of processing, will be able to access the Data of the Data Subject in order to fulfil the duties assigned to them by the Company, aimed at pursuing the aforementioned purposes.

Furthermore, the Company, for the pursuit of the purposes outlined in this information document, may need to communicate the Data of the Data Subject to the following categories of recipients:

- subjects who perform, on behalf of the Company or in favour of the Company, tasks of a technical nature and assistance or professional consultancy;
- professional firms and providers of goods and services
- Supervisory and Control Authorities and Bodies (e.g. Bank of Italy, Consob);
- Judicial Authorities and Public Security Authorities;
- auditing company;
- Fund investors, within the scope of their rights;
- directors, auditors and shareholders of the Company and controlling bodies, within the scope of their rights;
- subjects who perform the role of Depositary Bank of the Fund.

Subjects belonging to the above-mentioned categories act as Data Processors, where such processing is carried out on behalf of InvestIRE, or they may operate independently as separate Data Controllers.



The Data of the Data Subject processed by the Company shall not be published or disseminated in any other way and shall also not be transferred to entities established outside the European Economic Area.

6. Rights of the Data Subject

The Data Subject may exercise, at any time, his/her rights towards the Controller, pursuant to the Regulation, namely:

- access the Data concerning him/her and obtain certain information on their processing;
- rectify or complete them if inaccurate or incomplete;
- delete or restrict their processing, where applicable;
- object to their processing on grounds relating to his particular situation;
- withdraw consent, where the processing is based on such consent;
- obtain the portability of data subject to automated processing and based on consent or a contract with the Data Subject;
- lodge a complaint with the Data Protection Supervisor.

7. Controller and Processor of data processing

The Data Controller referred to in this information document is "InvestiRE SGR S.p.A.", with registered offices in Via Po, 16 / a - 00198 Rome and with offices in Milan, Largo Donegani, n.2- 20121, which can be contacted at the following addresses: Tel: 06 - 696291; Fax: 06 - 69629212; E-mail: trattamentodati@investiresgr.it.

8. How the Data Subject may exercise his/her rights

Requests relating to the exercise of rights referred to in paragraph 6 of this information document can be sent in writing by e-mail to: trattamentodati@investiresgr.it.

