

PRIVACY NOTICE IN COMPLIANCE WITH ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Effective from 01.10.2024

www.generali-am.com

Generali Asset Management S.p.A. (hereinafter "GenAM", "Generali AM", or "We"), as the Data Controller, protects the confidentiality, protection, and security of personal data processed during the navigation of the website www.generali-am.com (the "Website").

Therefore, users (hereinafter "You") of the Website are informed that during navigation, GenAM will mainly collect the information necessary to allow You to select Your type of investor and country of residence as well as to request support regarding GenAM services or products. For the remaining *browsing* sections, Your experience on the Website will remain almost anonymous.

Unless otherwise specified, this privacy notice does not apply: (i) to personal data processing activities carried out by Generali AM through means other than the Website (e.g. information collected offline) (ii) to processing activities carried out by other companies of the Generali Group on websites that You may access via links on the Website.

For information on how other companies of the Generali Group process personal data through their websites, please refer to the respective privacy notices available there.

We may change this privacy notice from time to time following the introduction of new regulations and/or sector provisions. The updated version of this privacy notice will always be available on this Website for consultation.

1. Which company will process the information related to you?

Generali AM processes the information related to you as the Data Controller under Regulation (EU) 2016/679 (hereinafter "GDPR"). If you wish to contact Generali AM or exercise a right related to the processing of such information, you can use the following contact details:

- By traditional mail: Generali Asset Management S.p.A. Società di gestione del risparmio Via Machiavelli 4, 34132 Trieste
- By email: Privacy.Genam@generali.com

If you wish to send questions about the processing of the information related to you to our Data Protection Officer (DPO) or exercise a right, you can use the following contact details:

- By traditional mail: Generali Asset Management S.p.A. Società di gestione del risparmio Via Machiavelli 4, 34132 Trieste, to the attention of the Data Protection Officer.
- By email: DPO.Genam@generali.com

2. For what purposes do we process the information related to you, and on what legal basis?

Generali AM will process some information related to you only to pursue the purpose and based on the legal ground set forth below:

Purpose	Legal Basis	Data Provision
Guarantee browsing the Web Site, after selecting the browsing criteria (e.g., investor type and language) and accepting the relevant conditions, and use the services offered by the Web Site, including the possibility of obtaining answers to requests for information or assistance to be sent to Generali AM	Performance of a contract to which the data subject is party	Mandatory [otherwise, we would not be able to allow you to browse the Website or provide feedback to your requests]

If Generali AM wishes to process the information for purposes other than those indicated above, before starting the processing of such data, Generali AM will provide you with the necessary information, including an identification of the appropriate legal basis.

Generali AM does not process your personal data based on automated decision-making processes.

3. Categories of personal data processed

Generali Asset Management will process the information related to you only to the extent necessary to achieve the purposes indicated above. It is understood that in addition to the above, we may process additional categories of personal data related to you, as better specified below:

- a. Data you voluntarily provide us when making any requests for information or assistance through the Website or using our contact details available on the Website. This data may include your name, surname, address, occupation, job title, employer/associated company, phone number, and email, as well as any other information you should provide us with when requesting information or assistance (collectively referred to as "Identification Data");
- b. *Browsing* data related to your use of the services offered on the Website, such as IP addresses or domain names of your devices, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, and other parameters related to your operating system and computer environment (collectively referred to as "Browsing Data"). This data may be collected through cookies installed on the Website following [our Cookie Policy available at this link](#). The collection of Browsing Data is not aimed at identifying you and the processing of such data would be done aggregate.

4. With whom do we share the information related to you?

If personal data related to you is processed by Generali AM, such processing will involve adequate, relevant, and limited data to what is necessary concerning the purposes for which they are processed using electronic and telematic tools as well as in paper form to ensure the security, protection, and confidentiality of your personal data

In such cases, we may transfer your personal data to the following categories of recipients:

- a. Third-party suppliers and companies of the Generali Group to the extent that such companies provide assistance or consultancy services to Generali AM, including, for example, and not limited to, technological, accounting, administrative and legal services;

b. Government authorities and supervisory bodies that are entitled to access your personal data under applicable laws; and

c. Parties involved in extraordinary transactions, such as mergers and demergers, as well as other companies resulting from mergers or other operations involving Generali AM.

Your personal data will not be shared to recipients other than those listed above (letters a, b, and c) nor disclosed.

5. Where do we transfer the information related to you?

Personal data related to you and possibly processed may be transferred abroad, both within and outside the European Economic Area (EEA).

In particular, the Company's activities may be supported by a network, cloud-based servers, and other IT infrastructures and technologies provided by third parties.

If, for technical and operational reasons, our suppliers are located in countries outside the EEA that may not guarantee an equivalent level of personal data protection as provided within the EEA, we will ensure that the level of personal data protection is adequately guaranteed through other measures, such as binding corporate rules, standard data protection clauses adopted by the European Commission, or based on specific exemptions provided by the GDPR. Further information on the countries to which personal data would be transferred and the security measures adopted can be requested by writing to: DPO.Genam@generali.com.

6. The rights you can exercise regarding the processing of personal data related to you You can exercise the following rights by contacting us at the contact details indicated in Section 1 above:

- **Right of access:**

You can ask Generali AM to access your personal data to know, for example, what personal data related to you Generali AM is currently processing.

- **Right to rectification:**

You can ask Generali AM to correct any personal data related to you that may be inaccurate or incomplete.

- **Right to erasure:**

You can ask Generali AM to delete personal data related to you if one of the following circumstances occurs:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- The personal data has been unlawfully processed by GenAM; and
- The personal data must be deleted to comply with a legal obligation under Union or Member State law to which Generali AM is subject.

- **Right to restriction of processing:**

You can ask Generali AM to limit the way it processes personal data related to you – and request only its storage – in one of the following cases:

- Contesting the accuracy of your personal data for a period that allows Generali AM to verify the accuracy of data;
- The processing is unlawful, and you oppose the deletion of your personal data, requesting instead the limitation of its use;

- Generali AM no longer needs your personal data for the purposes of processing, but this data is necessary for establishing, exercising, or defending legal claims;
- You have objected to the processing of your personal data, pending verification of whether Generali AM has overriding legitimate grounds for processing that outweigh your rights.

- **Right to data portability:**

You can ask Generali AM to transfer your personal data to another company or organization and/or receive your personal data in a structured, commonly used, and machine-readable format. If your personal data has been transferred outside the EEA, you also have the right to obtain a copy of such data or the indication of where it has been made available.

The rights listed above can be exercised by contacting Generali AM or our Data Protection Officer using the contact details indicated above (see Section 1). No charges will be made for activities resulting from your request unless the request is manifestly unfounded or excessive, in which case we may charge you the related costs. When you exercise your rights, we may request personal information to verify your identity.

7. The right to object to the processing of your personal data

You have the right to object to the processing of personal data related to you and to request the cessation of processing operations based on the legitimate interest of Generali AM by contacting Generali AM and/or our Data Protection Officer using the contact details indicated above (see Section 1).

8. The right to file a complaint with the competent supervisory authority

If you believe there are irregularities in the processing of personal data related to you, you have the right to file a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) according to the procedures indicated on the following website: <https://www.garanteprivacy.it/home>

You also have the right to file a complaint to the Supervisory Authority of the European Union member state where you reside, work or where such a violation is alleged to have occurred. The contact details of the supervisory authorities of European Union member states can be found at the following link: https://edpb.europa.eu/about-edpb/board/members_en.

9. How long do we keep data relating to you?

Any data relating to you that is processed will only be kept for as long as necessary to fulfill the specific purposes for which it was collected, as set out in this Privacy Policy. Specifically:

- a. Browsing data will be retained for no longer than fourteen months and will be deleted immediately after it is aggregated, except in cases where government authorities and/or supervisory bodies need access to such data to carry out their functions;
- b. User choices that allow you to browse the Web site based on selected criteria (e.g., language or country of origin) or to improve the services provided on the Web site, will be retained until deleted by you and, in any case, for no more than 2 years;
- c. Personal data relating to you and possibly processed during your browsing experience on the Website will be retained for no more than fourteen months, unless their retention for a longer period is required by applicable laws or to establish, exercise or defend actions in court. Regarding the personal data pertaining to you and processed in response to your request submitted via the 'Contact' section of the Website, they will be retained for no longer than three months.