

## 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**"), wants to provide the Data Subject (hereinafter the "**Data Subject**"), i.e. the Subscriber, in the case of a natural person, or its representatives, in the case of a legal person, entity or association, with certain information regarding the processing of personal data concerning him/her, in relation to the purchase and management of shares of a closed reserved real estate investment fund (hereinafter referred to as the "**Fund**"), managed by the Company.

### 1. Purpose of the processing

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

- a) acquisition, management and evaluation of the request of the Data Subject in purchasing the shares of a Fund and performance, also by means of questionnaires, forms and declarations filled in or issued by the Data Subject, of the preliminary analysis in accordance with the sector regulations (e.g. customer due diligence activities pursuant to anti-money laundering regulations, customer categorisation pursuant to the Regolamento Intermediari issued by Consob and verification of the absence of conflicts of interest indicated by the AIFM directive); for these purposes, the processing is necessary for the application of the pre-contractual measures requested by the Data Subject and for the compliance with the obligations provided for by the aforesaid regulations to which the Controller is subject;
- b) establishment of the contract relating to the subscription of the Fund's shares (hereinafter the '**Act**') and provision of the services and facilities covered by that contract; for this purpose, the processing of data is therefore necessary for the performance of it with the Data Subject.

### 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.), in the documents required to verify personal income (e.g. bank account statements, etc.) and other financial, accounting and administrative information strictly related to the subscription of the shares. For these purposes, the Controller does not normally process particular data of the Data Subject, but may process, where appropriate and in compliance with the relevant legislations, personal data relating to criminal convictions or offences for the purposes of the checks required by anti-money laundering regulations, in relation to the subscription of shares.

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 by the Data Subject to provide such Data shall entail the impossibility for the Data Subject to subscribe to the Act and/or in any case the impossibility for the Company to properly manage the shares subscribed by the Data Subject.

#### **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 shall process the Data of the Data Subject for the duration of the contractual relationship and, upon its termination, for the time provided for by the regulations in force for administrative, accounting, tax and anti-money laundering 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 (e.g. valuers, legal firms, tax firms, etc.);
- the parent company for anti-money laundering requirements;
- Agenzia delle Entrate, Supervisory and Control Authorities and Bodies (e.g. Bank of Italy, Consob, FIU);
- Judicial Authorities and Public Security Authorities;
- auditing company;
- subjects who perform the role of Depository Bank of the Fund;
- financing banks.

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.

In this last regard, in relation to the disclosure of Data to third parties, it should be noted that such disclosure is necessary to comply with an obligation imposed by law, regulation or EU legislation, or because the processing is necessary to perform the obligations arising from the Act to which the Data Subject is a party or to comply with specific requests made by the Data Subject, or in any case to pursue the legitimate interests of the Controller or third parties.



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 for any reason.

## **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/her 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 office in Milan, Largo Donegani, 2 - 20121, which can be contacted at the following addresses: Tel: 06 - 696291; Fax: 06 - 69629212; E-mail: [trattamentodati@investiresgr.it](mailto: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](mailto:trattamentodati@investiresgr.it).

