

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

Pursuant to EU Regulation 2016/679 concerning the "General Data Protection Regulation" ("EU Regulation 679/2016"), Kairos Partners Sgr S.p.A. (hereinafter the "Company"), as Data Controller, is required to provide you with information regarding the use of your personal data as a user of the above-mentioned websites (hereinafter collectively the "Website").

The Company has appointed a "Data Protection Officer" ("DPO") as provided for by the Regulation, who can be contacted at the following email address: [dpo@kairospartners.com](mailto:dpo@kairospartners.com)

This notice also refers to processing carried out by entities that perform, on behalf of the Company, the technical and organizational tasks described in paragraph 1.

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### **1. Purposes and methods of processing. Nature of data provision**

The personal data held by the Company are provided directly by the individual to whom the personal data refer ("Data Subject"), through indirect technical provision (e.g. user IP address) or through voluntary provision of data (e.g. by requesting information through the Company's contact details).

Personal data are processed as part of the Company's ordinary activities for the following purposes:

- a) to provide users with the technical ability to browse the Website and use its services and content, based on the overriding legitimate interest of the Data Controller, also with a view to improving the Website through anonymous aggregated statistical analysis of its use.

The provision of personal data necessary for these purposes is not mandatory, but failure to provide them may result in the Company being unable to grant access to and ensure the proper functioning of the Website. Such processing does not require your consent; data will be processed for the time strictly necessary for use of the Website.

- b) to respond to any requests from the Data Subject (for information, etc.) regarding the activities and content of the Website or the Company, based on pre-contractual/contractual requests of the Data Subject or the Company's legitimate interest.

The provision of personal data necessary for these purposes is not mandatory, but failure to provide them would – in relation to the request made – make it impossible for the Company to reply or provide the requested information. Such processing does not require your consent; data will be processed for the time necessary to assess and respond to your requests.

#### **Kairos Partners SGR S.p.A.**

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Iscritta all'Albo delle SGR ex art. 35 TUF al n. 21 Sezione Gestori OICVM e al n. 26 Sezione Gestori FIA- Aderente al Fondo Nazionale di Garanzia.

Appartenente al Gruppo Bancario Banco BPM e soggetta all'attività di direzione e coordinamento di Banco BPM S.p.A.

c) compliance with obligations laid down by laws, regulations or EU legislation (e.g. retention of corporate correspondence pursuant to Art. 2220 of the Italian Civil Code).

The provision of personal data necessary for these purposes is mandatory and the related processing does not require your consent; data will be processed for the period required by applicable laws.

d) other purposes based on the legitimate interest of the Company or third parties, such as:

- Fraud prevention (Recital 47 EU Regulation 679/2016)
- Security of networks and information systems (Recital 49 EU Regulation 679/2016)
- The possible establishment, exercise or defence of legal claims.

Provision of the data required for these purposes is mandatory when using the Website; otherwise, the Company would not be able to protect such legitimate interests. Such processing does not require your consent; data will be retained for up to 6 months for fraud prevention and security purposes, and for the time necessary to establish/exercise/defend legal claims, including the applicable limitation period (e.g. 10 years for contractual liability).

In relation to the purposes described above, personal data are processed through manual procedures or electronic and/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 (with particular regard to the use of remote communication techniques).

For the use of cookies through the Website, please refer to the relevant cookie policy: <https://www.iubenda.com/privacy-policy/17928668/cookie-policy>. For the use of social networks, please refer to the relevant privacy notices of the respective social networks (as regards information exchanges with users, the provisions of this notice shall apply, while any publication of communications and exchanges between the Company and users shall instead be governed by the specific conditions of those social networks, for example regarding data retention).

## **2. Categories of data processed**

The Company and the other entities that, on its behalf or in its interest, perform the tasks described in paragraph 1 above process your personal data collected through your browsing of the Website (IP address, pages visited, etc.) or provided directly by you (e.g. by requesting information or contacting the Company).

In providing the services and activities indicated in this notice, the Company does not need to process personal data that Article 9 of the Regulation defines as "special categories" (such as data revealing health status, political or trade union opinions, religious beliefs, etc.). For this reason, we kindly ask you not to provide such types of data to the Company; otherwise, they will be promptly deleted. However, should the Company, for operational reasons, need to process "special category" data, it will provide you with a new and specific notice together with a request for specific consent.

## **3. Categories of entities to whom data may be disclosed or who may become aware of them as data processors or people authorized to process data**

For the pursuit of the purposes described in paragraph 1, the Company may need to disclose your personal data to third parties belonging to the following categories:

- entities that perform, on behalf of the Company, technical or organizational tasks indicated in paragraph 1;
- external companies and/or professionals used by the Company within the framework of assistance and consultancy relationships;
- placement agents as well as any other entities indicated in the contractual documentation;
- banking and financial intermediaries, in order to execute your instructions and settle the consideration provided for in the contracts you have entered into;
- Supervisory Authorities and Bodies, Judicial Authorities and, in general, public or private entities performing public-interest functions (such as the Bank of Italy, Consob and UIF);

- entities responsible for coordination, supervision and management of internet networks, both national and international, as well as communication and telephone networks;
- public administration entities (e.g. public bodies or state authorities) where necessary for the Company's activities or as required by law.

The recipients of the communications described in this notice operate independently, as separate data controllers or, in some cases, have been appointed by the Company as data processors. Their list, constantly updated, is available at the Company.

Certain categories of persons, as persons authorized to process data, may access your personal data in order to perform their assigned duties. In particular, the Company has designated, as persons authorized to process client data, its employees — including system administrators — temporary workers and interns.

Data processors appointed by the Company may also become aware of your personal data in the course of carrying out the tasks entrusted to them. Their identity can be obtained as indicated in paragraph 5.

Personal data processed by the Company and by entities performing technical and organizational tasks on its behalf are not subject to dissemination.

Unless otherwise specifically indicated, data will not be transferred or processed outside the European Union or to countries not considered adequate under EU data protection legislation. Where applicable, transfers may take place on the basis of European Commission standard contractual clauses or other appropriate safeguards (Art. 46 GDPR), or on the basis of one of the derogations provided for in Art. 49 GDPR.

#### **4. Rights of the Data Subject pursuant to Articles 15 et seq. of EU Regulation 679/2016**

Under data protection legislation, Data Subjects may exercise specific rights. In particular, each Data Subject has:

- a) the right to obtain confirmation as to whether personal data concerning you are being processed and, if so, access to those personal data and related information.
- b) the right to obtain without undue delay the correction of inaccurate personal data concerning you.
- c) the right to obtain the deletion of personal data concerning you, where the conditions set out in the Regulation apply.
- d) the right to obtain restriction of processing where one of the grounds provided for by the Regulation applies.
- e) the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and to transmit those data to another data controller without hindrance from this Company.
- f) the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- g) the right to lodge a complaint with the competent Data Protection Authority if you believe that the processing of your personal data infringes the Regulation.
- h) the right to bring proceedings before the competent courts if you consider that your rights under the Regulation have been infringed as a result of unlawful processing of your personal data.
- i) the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, or for the purposes of the legitimate interests pursued by the Data Controller.

## 5. Data Controller and Data Processors

The Data Controller is Kairos Partners Sgr S.p.A., registered in the register held by the Bank of Italy no. 21 (UCITS Managers Section) and no. 26 (AIF Managers Section) – Member of the National Guarantee Fund, with registered office in Via San Prospero 2, Milan – 20121.

Requests relating to the exercise of the above rights may be submitted in writing or by email to: [privacy@kairospartners.com](mailto:privacy@kairospartners.com)

Requests concerning the identity of the Data Processors appointed by the Company may also be made orally. The complete list of appointed Data Processors may be requested via email at the email address: [privacy@kairospartners.com](mailto:privacy@kairospartners.com)

## 6. Amendments

This Privacy Notice may be subject to amendments and updates where changes are made to the way we process your data or to the other information provided herein. Any changes will, in any case, ensure full protection of your rights. As this notice relates to the Website and its browsing, any updates will be made available through publication on the Website, which you are invited to check periodically for updates.