PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

October 2026

Pursuant to Regulation (EU) 2016/679, the General Data Protection Regulation (the "GDPR"), Kairos Partners SGR S.p.A. (hereinafter the "Company"), in its capacity as Data Controller, is required to provide you with information concerning the processing of your personal data as a user of the aforementioned websites (hereinafter collectively the "Website").

The Company has appointed a Data Protection Officer ("DPO") as provided for by the GDPR, who may be contacted at dpo@kairospartners.com.

This Privacy Notice also applies to processing carried out by parties performing, on behalf of the Company, the technical and organisational activities described in Section 1.

CONTENTS

1. **Purposes and methods of processing. Whether the provision of data is mandatory.**

2. **Categories of personal data processed.**

3. **Categories of persons to whom personal data may be disclosed or who may have access to them as processors or persons authorised to process data.**

4. **Rights of Data Subjects under Articles 15 et seq. of Regulation (EU) 2016/679.**

5. **Data Controller and Data Processors.**

6. Amendments.

1. Purposes and methods of processing. Whether the provision of data is mandatory

The personal data held by the Company are provided by the person to whom they relate (the "Data Subject"), either indirectly through technical means (e.g. the user's IP address when accessing the Website) or through the voluntary provision of data (e.g. when requesting information through the Company's contact details).

Personal data are processed in the course of the Company's ordinary business activities for the following purposes:

a) To enable users to browse the Website and access its services and content, on the basis of the overriding legitimate interest of the Data Controller, including with a view to improving the Website through anonymous, aggregated statistical analyses of its use.

The provision of personal data necessary for these purposes is not mandatory; however, a refusal to provide such data may prevent the Company from granting access to the Website or ensuring its proper functioning. Such processing does not require your consent; the data will be processed for as long as necessary for use of the Website.

b) To respond to any requests made by the Data Subject (for information, etc.) concerning the activities and content of the Website or the Company, on the basis of the Data Subject's pre-contractual/contractual requests or the Company's legitimate interest.

The provision of personal data necessary for these purposes is not mandatory; however, refusal to provide such data would prevent the Company, depending on the request made by the Data Subject, from responding or providing the requested information. Such

processing does not require your consent; the data will be processed for as long as necessary to assess and respond to your requests and provide the relevant information.

c) To comply with obligations imposed by laws, regulations or EU legislation (e.g. the retention of corporate correspondence pursuant to Article 2220 of the Italian Civil Code).

The provision of personal data necessary for these purposes is mandatory, and the relevant processing does not require your consent; the data will be processed for the period prescribed by applicable law.

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

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

The provision of the necessary data is mandatory when using the Website, as otherwise the Company would be unable to safeguard these legitimate interests. The relevant processing does not require your consent. Data will be processed for up to six months for fraud prevention and security purposes, and for as long as necessary for the establishment, exercise or defence of legal claims, including any applicable limitation period (e.g. ten years for contractual liability).

For the purposes described above, personal data are processed manually or by electronic or otherwise automated means, in accordance with procedures strictly related to those purposes and, in any event, in a manner designed to ensure the confidentiality and security of personal data (particularly where remote communication technologies are used).

Use of tracking tools in email marketing communications.

When sending promotional communications by email, the Company may use tracking tools (so-called "tracking pixels"), i.e. technical elements embedded in messages which, when the message is displayed, may enable the Company to detect whether it has been opened, the date and time of opening and, depending on the technologies used, technical information such as the IP address and the characteristics of the device or email application used. Where associated with the recipient, such data may be processed to measure the effectiveness of campaigns and improve promotional communications.

The use of such tools for the purposes described above is covered by any consent given by the Data Subject for direct marketing activities, on the basis of the information provided in this Privacy Notice. Consent is optional, and failure to give consent does not affect access to the Company's services.

The Data Subject may, at any time, withdraw consent for direct marketing activities or selectively withdraw consent solely for the use of tracking tools (so-called "tracking pixels"), in which latter case the Data Subject may continue to receive promotional communications without being tracked. To this end, the Data Subject may manage their preferences through the dedicated link at the bottom of each promotional email, which allows them either to withdraw marketing consent or to disable tracking tools only. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

For information on the use of cookies on 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 privacy notices of the relevant social networks (the provisions of this Privacy Notice apply to exchanges of information with users, whereas any publication of communications and exchanges of information between the Company and users will be governed by the specific terms of those social networks, including with respect to the retention of published data).

2. Categories of personal data processed

The Company and other parties performing, on its behalf or for its benefit, the activities described in Section 1 above process your personal data collected during your browsing of the Website (IP address, pages visited, etc.) or provided directly by you (e.g. when requesting information or contacting the Company).

In providing the services and carrying out the activities described in this Privacy Notice, the Company does not need to process personal data classified as "special categories" under Article 9 of the GDPR (such as personal data revealing health status, political opinions, trade union membership, religious beliefs, etc.). You are therefore requested not to communicate such data to the Company; should you do so, they will be promptly deleted. However, if the Company needs to process special categories of personal data for its operations, it will provide you with a new, specific privacy notice together with a request for specific consent to process such data.

3. Categories of persons to whom personal data may be disclosed or who may have access to them as processors or persons authorised to process data

To pursue the purposes described in Section 1, the Company needs to disclose your personal data to third parties belonging to the following categories:

- Parties performing, on behalf of the Company, the technical or organisational activities referred to in Section 1;
- External companies and/or professionals engaged by the Company to provide assistance and advisory services;
- Intermediaries responsible for distribution, as well as any other parties indicated in the contractual documentation;
- Banking and financial intermediaries, for the purpose of carrying out your instructions and settling amounts payable under contracts entered into by you;
- Regulatory and supervisory authorities, judicial authorities and, more generally, public or private entities carrying out functions of public interest (such as the Bank of Italy, Consob and the Italian Financial Intelligence Unit (UIF));
- National and foreign bodies responsible for coordinating, supervising and managing the Internet and communications and telephone networks;
- Public administration bodies (e.g. public authorities or government bodies), where necessary for the Company's activities or where required by law, in accordance with the above purposes.

The recipients of the disclosures described in this Privacy Notice act independently as separate data controllers or, in certain cases, have been appointed by the Company as data processors. An up-to-date list of such recipients is available from the Company.

Certain categories of persons authorised to process data may have access to your personal data for the performance of their assigned duties. In particular, the Company has authorised its employees, including system administrators, temporary agency workers engaged by the Company and interns, to process customer personal data in connection with their assigned duties.

Persons appointed by the Company as Data Processors may also become aware of your personal data in the course of performing their assigned duties. The identity of the Data Processors appointed by the Company can be obtained in the manner indicated in Section 5 below.

Personal data processed by the Company and by parties carrying out, on its behalf, the technical and organisational activities described in Section 1 are not made publicly available.

Unless otherwise specifically stated, personal data will not be transferred to or processed outside the European Community or in another location not considered adequate under EU data protection legislation. Where such a transfer takes place, it may generally be based on the European Commission's Standard Contractual Clauses or other appropriate safeguards (Article 46 GDPR), or on one of the derogations under Article 49 GDPR.

4. Rights of Data Subjects under Articles 15 et seq. of Regulation (EU) 2016/679

Data protection legislation grants Data Subjects specific rights. In particular, each Data Subject has:

a) The right of access under Article 15 of Regulation (EU) 2016/679, namely the right to access personal information concerning them;

b) The right to rectification under Article 16 of Regulation (EU) 2016/679, namely the right to have inaccurate personal data concerning them corrected without undue delay;

c) The right to erasure (the "right to be forgotten") under Article 17 of Regulation (EU) 2016/679, namely the right to obtain the erasure of personal data concerning them;

d) The right to restriction of processing where one of the circumstances set out in Article 18 of Regulation (EU) 2016/679 applies;

e) The right to data portability under Article 20 of Regulation (EU) 2016/679, namely the right to receive their data in an interoperable format and/or to have their personal data transmitted to another controller without hindrance by the Company;

f) The right to withdraw consent at any time under Article 7 of Regulation (EU) 2016/679. In relation to promotional communications sent by email, the Data Subject may at any time selectively withdraw consent for the use of tracking tools (so-called "tracking pixels"), without affecting consent to receive marketing communications, through the dedicated link at the bottom of each email, which enables the relevant preferences to be managed separately;

g) The right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) in the event of an infringement concerning the processing of personal data, pursuant to Article 77 of Regulation (EU) 2016/679;

h) The right to seek a judicial remedy in the event of unlawful processing of personal data, including against decisions taken by the Data Protection Authority pursuant to Article 78 of Regulation (EU) 2016/679;

i) THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF THEIR PERSONAL DATA ON GROUNDS RELATING TO THEIR PARTICULAR SITUATION WHERE: (I) THE PROCESSING IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR IN THE EXERCISE OF OFFICIAL AUTHORITY; OR (II) THE PROCESSING IS BASED ON THE LEGITIMATE INTERESTS OF THE DATA CONTROLLER.

5. Data Controller and Data Processors

The Data Controller of the personal data covered by this Privacy Notice is Kairos Partners SGR S.p.A., registered in the register maintained by the Bank of Italy under No. 21 in the UCITS Management Companies Section and No. 26 in the AIF Managers Section, and a member of the National Guarantee Fund, with registered office at Via San Prospero 2, 20121 Milan, Italy.

Requests to exercise the rights described above may be submitted in writing or by email to privacy@kairospartners.com.

Requests concerning the identity of the Data Processors appointed by Kairos Partners SGR S.p.A., as well as the requests referred to in Section 5 above, may also be made orally. The complete list of Data Processors appointed by the Company may be requested by emailing privacy@kairospartners.com.

6. Amendments

This Privacy Notice may be amended or updated if changes are made to the way we process your data or to the other information provided herein. Any amendments will, in all cases, ensure the full protection of your rights. As this Privacy Notice relates to the Website and browsing thereof, any amendments will be communicated simply by publication on the Website, which should be consulted periodically for updates.