

PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

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

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

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

1. Purposes and methods of processing. Nature of the provision of data.

The personal data held by the Company are provided directly by the individual to whom they relate (the "Data Subject"). Personal data may also be collected by the Company in the course of its business activities or obtained from third parties (e.g. placement agents, banks and other financial intermediaries). In order to identify and verify the identity of any beneficial owner, in accordance with anti-money laundering and counter-terrorist financing legislation (Legislative Decree No. 231/2007 and implementing provisions), the Company may request relevant information from the Data Subject or obtain the beneficial owner's personal data directly (by consulting publicly available registers, lists, records and documents) or through distribution agents.

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

- a) purposes strictly related and ancillary to portfolio management and the consequent management of customer relationships (e.g. obtaining information prior to entering into a contract, executing transactions in fulfilment of obligations under contracts entered into with customers, reviewing and assessing the results and performance of such relationships and the associated risks, etc.).

The provision of personal data necessary for these purposes is not mandatory; however, refusal to provide such data may, depending on the relationship between the data and the requested service, prevent the Company from providing that service. Such processing does not require your consent;

- b) compliance with obligations imposed by laws, regulations or European Union legislation (e.g. customer and beneficial-owner due diligence requirements, disclosure of information concerning the Data Subject in accordance with anti-money laundering and counter-terrorist financing rules, or requirements imposed by Supervisory Authorities). The provision of personal data necessary for these purposes is mandatory and the related processing does not require your consent;

- c) other purposes related to the Company's business activities, including:

- assessing customer satisfaction with the quality of the services provided and the activities carried out by the Company, including through specialist companies, by means of personal or telephone interviews, questionnaires, etc.;
- promoting and selling products and services of the Company or third parties through letters, telephone calls, advertising materials, automated communication systems and profiling related to investment preferences;
- using tracking tools (so-called tracking pixels) in promotional email communications to collect information on recipients' interactions with the messages received, such as whether a message has been opened, the date and time of viewing and any interactions with its content, in order to analyse the effectiveness of communications and improve the Company's commercial initiatives;

- conducting studies and market research through personal or telephone interviews, questionnaires and the distribution of information materials on products and services offered by the Company, including by processing personal data relating to investment preferences.

The provision of data for the purposes referred to in point (c) above is optional, and processing for such purposes requires your consent.

For the purposes described above, personal data are processed manually or by electronic or other automated means, using methods strictly related to those purposes and, in all cases, 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 messages are viewed, may enable the Company to detect whether a communication 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 such data are associated with a recipient, they may be processed to measure campaign effectiveness and improve promotional communications.

The use of these 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 it will not affect access to the Company's services.

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

For certain services, the Company relies on trusted companies acting as Data Processors and performing technical or organisational functions, including: printing, enveloping, sending, transporting and sorting customer communications; providing IT services for the supply, development and maintenance of software and hardware systems necessary for, or otherwise supporting, the services provided by the Company; assessing customer satisfaction or needs; banking and financial intermediation activities; and statutory auditing.

2. Categories of personal data processed

The Company and other parties performing the functions described in Section 1 on its behalf or for its benefit process your personal data relating to: name, address and other identifying details; Italian tax identification number; bank account identification details (e.g. IBAN); information concerning family and personal circumstances; and information concerning the Data Subject's education and employment. In providing the services and carrying out the activities described in this Privacy Notice, the Company does not need to process personal data belonging to the "special categories" referred to in Article 9 of the GDPR (such as data revealing health status, political opinions, trade union membership, religious beliefs, etc.). You are therefore requested not to disclose such data to the Company. However, should the Company need to process special-category data for its operations, it will provide you with a new, specific privacy notice together with a request for specific consent to the processing of such data.

3. Categories of recipients to whom data may be disclosed or who may access them as Data Processors or authorised personnel

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

- parties performing the technical or organisational functions referred to in Section 1 on behalf of the Company, including the statutory auditor;
- placement agents and any other parties identified in the contractual documentation;
- banking and financial intermediaries, in order to carry out your instructions and settle the payments provided for under contracts entered into by you;
- Regulatory and Supervisory Authorities, Judicial Authorities and, more generally, public or private entities entrusted with public-interest functions (such as the Bank of Italy, CONSOB and the Italian Financial Intelligence Unit (UIF));
- external companies and/or professionals engaged by the Company to provide assistance and advisory services;

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 parties is available from the Company.

Certain categories of persons may access your personal data as persons authorised to process personal data for the performance of their assigned duties. In particular, the Company has authorised its employees, including system administrators, temporary agency workers and interns, to process customer data insofar as necessary for their respective duties.

Persons appointed by the Company as Data Processors may also have access to your personal data when performing the duties entrusted to them. Information on the identity of the Data Processors appointed by the Company may be obtained as indicated in Section 5 below.

Personal data processed by the Company and by parties performing the technical and organisational functions described in Section 1 on its behalf will not be made publicly available.

Solely for the purpose of improving performance of the existing contractual relationship, personal data may also be processed by collaborators/partners established outside the European Union who have been appointed as Data Processors and are required to comply with applicable data protection legislation (i.e. Regulation (EU) 2016/679 and implementing measures of the Italian Data Protection Authority), on the basis of either (i) an adequacy decision adopted by the competent authority or (ii) a specific agreement drawn up in accordance with the model contractual clauses provided by the competent authority, as contemplated by Article 46(3)(a) of Regulation (EU) 2016/679. That provision permits transfers of personal data to third countries subject to appropriate safeguards for the protection of the Data Subject's personal data, including "contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation".

4. Retention periods for personal data.

Personal data will be processed for the entire duration of the contractual relationships established and thereafter to comply with all applicable legal obligations, in any event for no longer than 10 years after termination of the contractual relationship, except where longer retention is expressly required by law.

5. Data Subject rights under Articles 15 et seq. of Regulation (EU) 2016/679.

Data protection legislation grants Data Subjects a number of 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 all 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 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 personal data in an interoperable format and/or to have those data transmitted to another Data Controller without hindrance from 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 to the use of tracking tools (so-called tracking pixels) without affecting consent to receive marketing communications, using the dedicated link at the bottom of each email, which allows the relevant preferences to be managed separately;
- g) the right to lodge a complaint with the Italian Data Protection Authority in the event of a breach in 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 of the Italian Data Protection Authority, pursuant to Article 78 of Regulation (EU) 2016/679;
- i) the right to object at any time to processing for the sending of commercial communications, advertising materials or direct marketing by sending an email to privacy@kairospartners.com expressly requesting removal of their name from the marketing list.

6. Data Controller and Data Processors.

The Data Controller of the personal data covered by this Privacy Notice is Kairos Partners SGR S.p.A., entered in the register maintained by the Bank of Italy under No. 21 in the UCITS Managers Section and No. 26 in the AIF Managers Section, 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 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 email at privacy@kairospartners.com.

The Data Controller

Kairos Partners SGR S.p.A.