

DOCUMENTATION IN COMPLIANCE WITH GDPR – PRIVACY NOTICE

Last update: July 29th, 2026

Dear Data Subject, we would like to inform you that “**Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data**” (hereinafter the “**GDPR**”) establishes the protection of natural persons with regard to the processing of personal data as a fundamental right. Pursuant to Article 13 of the said Regulation, we hereby inform you that:

1. DATA CONTROLLER AND DPO

The data controller is **Plenisfer Investments SGR S.p.A.**, with registered office in via Niccolò Machiavelli 4, 34132 Trieste (TS), which can be contacted at the e-mail address privacy@plenisfer.com. The Data Controller has appointed a **Data Protection Officer (DPO)**, who can be contacted at the same e-mail address privacy@plenisfer.com.

2. DATA CATEGORIES

The Data Controller will process your personal data such as:

- a. Data collected automatically:** the computer systems and applications dedicated to the operation of this website detect, during their normal operation, some data (the transmission of which is implicit in the use of Internet communication protocols) potentially associated with identifiable users. The data collected include the IP addresses and domain names of the computers used by users who connect to the site, the URI (Uniform Resource Identifier) addresses of the requested resources, the timestamp of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters concerning the operating system, the browser and the IT environment used by the user. These data are processed in order to obtain statistical information on the use of the site and to check its regular functioning. Such data (browsing logs) are kept for a maximum period of 6 months. The provision of such data is mandatory as it is directly linked to the web browsing experience.
- b. Data provided voluntarily by the user:** the voluntary and explicit sending of e-mails to the addresses indicated in the different access channels of this site entails the subsequent acquisition of the sender's address and data, necessary in order to respond to the requests submitted (legal basis: performance of pre-contractual measures taken at the data subject's request). The completion of any specifically prepared forms entails the acquisition of the data indicated therein; the user must give explicit consent where the processing is aimed at sending the newsletter (legal basis: consent of the data subject).
- c. Cookies:** the site uses technical cookies necessary for the correct functioning of the site (legal basis: legitimate interest of the Data Controller in ensuring the correct functioning of the site; no consent required). The site also uses third-party analytics cookies, which are installed exclusively subject to the user's prior consent, obtained through a dedicated Cookie Management Platform (CMP) before the cookies are installed (legal basis: consent of the data subject; see the Guidelines of the Italian Data Protection Authority of 10 June 2021, no. 231), as well as third-party cookies connected with the service that protects the newsletter subscription form against automated submissions and abuse. For further information please refer to the Cookie Policy.

- d. Newsletter subscription data:** if you subscribe to the newsletters, we collect your first name, last name, e-mail address and the editorial lists you select. The subscription form is managed through an e-mail marketing platform provided by a data processor and is protected by a third-party service against automated submissions (legal basis: consent of the data subject).
- e. Statistical data on e-mail communications:** the newsletters we send include tracking pixels, that is invisible images which make it possible to count openings and clicks. The count is carried out exclusively in aggregated and anonymous form: the data recorded are not associated with individual recipients and do not make it possible to reconstruct individual behaviour. For this reason, the processing does not require your consent.

3. SOURCE OF PERSONAL DATA

The personal data held by the Data Controller are collected directly from the data subject.

4. PURPOSES OF PROCESSING AND LEGAL BASIS

Your personal data are processed for the following purposes and on the following legal bases:

- a.** Management of user requests received through the contact form or by e-mail – legal basis: performance of pre-contractual measures taken at the data subject's request;
- b.** Technical functioning of the web portal, monitoring of security and of correct functioning – legal basis: legitimate interest of the Data Controller in ensuring the security and the correct functioning of the site;
- c.** Subscription to the periodic newsletter concerning the activities and initiatives of the Data Controller. Legal basis: consent of the data subject. Consent may be withdrawn at any time without affecting the lawfulness of processing based on consent given before its withdrawal;
- d.** Measurement, in aggregated and anonymous form, of the openings of and clicks on the newsletters sent, in order to assess the overall performance of the communications. Legal basis: legitimate interest of the Data Controller in assessing the effectiveness of its own communications; the data are not associated with individual recipients.

In addition, the data may be processed in anonymised and/or aggregated form in order to improve the web browsing experience and for statistical purposes (legal basis: legitimate interest of the Data Controller). Finally, your data may be processed in order to fulfil obligations laid down by laws, regulations and/or EU legislation, or required by supervisory and control authorities (legal basis: compliance with a legal obligation).

5. RECIPIENTS OF DATA

Within the limits relevant to the processing purposes indicated, your data may be communicated to:

- a.** the provider of the website hosting service, appointed as data processor pursuant to Article 28 GDPR;
- b.** providers of analytics platforms, appointed as data processors;
- c.** providers of newsletter/e-mail marketing services, appointed as data processors;
- d.** companies belonging to the Data Controller's group, consultants, consulting firms and other external providers rendering services to the Data Controller, appointed as data processors where the relevant conditions are met;
- e.** public or judicial authorities, where required by law.

The data processors are specifically identified, and the relevant list is available on request.

6. TRANSFER OF DATA ABROAD

In relation to the technical services used for the operation of the website (hosting, analytics, e-mail marketing), your personal data may be transferred to third countries outside the European Economic Area. In such case, the transfer takes place on the basis of:

- a. an adequacy decision of the European Commission (where available);
- b. Standard Contractual Clauses (SCCs) adopted by the European Commission (Decision 2021/914/EU);
- c. the provider's adherence to the EU-US Data Privacy Framework (for transfers to the United States).

For data processed exclusively on infrastructures located within the territory of the European Union, no transfer outside the EU takes place. In practice, the data relating to the management of the website and to the sending of the newsletters are processed on servers located within the European Union; the data collected through the service protecting the subscription form may be transferred to the United States on the basis of the provider's adherence to the EU-US Data Privacy Framework. A copy of the safeguards adopted for such transfers may be requested by writing to the e-mail address privacy@plenisfer.com.

7. STORAGE PERIOD

The data collected will be kept for the following periods:

- a. browsing data and technical logs: 6 months from collection;
- b. data provided through the contact form: 12 months from the request;
- c. technical cookies: for the duration of the browsing session;
- d. analytics cookies: as indicated in the cookie policy, in any event no longer than 13 months;
- e. data relating to the newsletter: until consent is withdrawn or the user unsubscribes;
- f. data relating to the openings of and clicks on e-mail communications: processed exclusively in aggregated and anonymous form and not attributable to individual data subjects.

Once the above periods have elapsed, the data are deleted or irreversibly anonymised. The obsolescence of the data stored is verified periodically.

8. RIGHTS OF THE DATA SUBJECT

The data subject is always entitled to:

- a. request access to their data from the Data Controller (Article 15 GDPR);
- b. obtain the rectification of inaccurate data (Article 16 GDPR);
- c. obtain the erasure of the data (Article 17 GDPR);
- d. obtain the restriction of processing (Article 18 GDPR);
- e. receive the data in a structured and commonly used format – portability (Article 20 GDPR);
- f. object to the processing on grounds relating to their particular situation (Article 21 GDPR);
- g. object at any time to the processing of their data for direct marketing purposes, including profiling to the extent that it is related to such marketing (Article 21(2) GDPR);

- h.** withdraw consent at any time, without affecting the
- i.** lawfulness of processing based on consent given before its withdrawal (Article 7(3) GDPR). In particular, it is possible to unsubscribe from the newsletters at any time by means of the link included in every communication.

These rights may be exercised by writing to the Data Controller at the e-mail address indicated above. The Data Controller will reply within one month of the request, a period which may be extended by a further two months in particularly complex cases (Article 12(3) GDPR). The data subject also has the right to lodge a complaint with the Italian Data Protection Authority, Garante per la protezione dei dati personali (www.garanteprivacy.it), if they consider that the processing of their data is contrary to then applicable legislation.

9. AUTOMATED DECISION-MAKING

The Data Controller does not carry out solely automated decision-making processes, including profiling, which produce legal effects concerning you or similarly significantly affect you pursuant to Article 22 GDPR.

10. METHODS OF PROCESSING

The personal data you provide will be subject to processing operations in compliance with the legislation referred to above and with the confidentiality obligations underlying the activity of the Data Controller. The data will be processed both by electronic means and on paper and on any other suitable medium, in compliance with the adequate security measures pursuant to Article 5(1)(f) GDPR.

11. PROVISION OF DATA

The provision of browsing data (technical logs) is necessary for the functioning of the website; failure to provide it makes browsing impossible. The provision of data through the contact form is optional; failure to provide it means that the Data Controller cannot respond to the user's request. The giving of consent to the newsletter is optional; failure to give it results solely in the impossibility of receiving the Data Controller's periodic communications.

12. THIRD-PARTY WEBSITES

This privacy policy is not to be considered valid for other websites that may be accessed through links present on websites under the Data Controller's domain, which is not to be considered in any way responsible for third-party websites.