

Website Privacy Statement

30 September 2022

We are providing this information not only to comply with legal data protection obligations established in Regulation (EU) 2016/679 or “Regulation”, but also because we believe protecting personal data is fundamentally important. As such, we want to provide you with the information you may need to protect your privacy and control the use of your data when you navigate our website. According to article 13 of the GDPR, we inform you that:

1. **DATA CATEGORIES:** Plenifer Investments SGR S.p.A. (“the Company”) will process your personal data associated with your use of the Company’s website as follows:
 - *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 collected data may include:
 - i. IP addresses and domain names of the devices or proxy servers employed by users who connect to the site,
 - ii. URI (Uniform Resource Identifier) addresses of the requested resources,
 - iii. the time of the request,
 - iv. the method used to submit the request to the server,
 - v. the size of the file obtained in response,
 - vi. the numerical code indicating the status of the response given by the server and
 - vii. other parameters concerning the operating system, the browser and the IT environment used by the user.

All personal data are processed, for the time strictly necessary, for the sole purpose of obtaining statistical information on the use of the site and to check its regular functioning. The provision of such data is mandatory as it is directly linked to the web browsing experience.

- *Data provided voluntarily by the user:* The personal data provided by the user by filling in the form(s) on the website or sending an email to an email address found on the website will be processed by the Company for the sole purpose of managing the user’s request, as well as for the purpose of fulfilling the legal obligations to which the Company is subject.
 - *Cookies:* The site uses first- and third-party cookies necessary for the proper functioning of the website. For more information see the Cookie Policy, which is on this website.
2. **DATA CONTROLLER:** The data controller is the Company, which can be contacted by e-mail at privacy@plenifer.com.

3. **PURPOSE OF DATA PROCESSING AND LEGAL BASIS:** The processing of your data has your consent as its legal basis and is carried out for the management of the following purposes:

- For the management of any user requests, received explicitly through the sending of requests to the email addresses on the website;
- To monitor traffic and the correct functioning of the website.
- In anonymized and / or aggregated form, to improve the web browsing experience and to monitor the proper functioning of the website, as well as for its protection.
- To fulfil obligations under EU laws, regulations and / or regulations, or ordered by the supervisory and control authorities; in this case, the legal basis of the processing is the fulfilment of the legal obligations to which the Data Controller is subject.

This site processes your data in a lawful and correct manner, adopting the appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of your data.

4. **RECIPIENTS OF DATA:** Within the limits relevant to the purposes of processing data, as indicated, your data may be disclosed to partners, consulting companies or private companies, which are appointed by the Data Controller or for legal obligations or to fulfil your specific requests.

5. **TRANSFER OF DATA ABROAD:** The data collected are not subject to transfer abroad.

6. **STORAGE PERIOD:** The data collected will be kept for only as long as required to perform the function requested ("conservation limitation principle", art.5, GDPR) or according to the deadlines set by the relevant regulation and / or law. The verification of the data storage timeframes in relation to functional requests is carried out periodically.

7. **RIGHTS OF THE INTERESTED PARTICIPANT:** You are entitled to request access to your data, correct or cancel it, limit the processing or have the possibility to object to the processing, request data portability, to revoke the consent to the processing by relying on these and other rights provided by the GDPR through a simple communication to the Data Controller.

8. **DATA PROCESSING:** Includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data, in compliance with the appropriate security measures pursuant to Article 5 par. 1 lett. F of the GDPR.

9. **LIMITATIONS AS TO THIS STATEMENT:** This Website Privacy Statement is not to be considered valid for other websites that may be consulted through links on websites under the domain(s) of Plenisher Investments SGR S.p.A., who is not to be considered in any way responsible for the websites of third parties.