

PERSONAL DATA PROTECTION NOTICE

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Updated on 30.10.2025

1. YOUR PRIVACY



At **Neva Società di Gestione del Risparmio S.p.A.** we know the value of your personal data and we constantly strive to process them confidentially and securely so that you may entrust them to us with peace of mind.

In this notice we will show you which categories of data we handle and why; which data sources we draw on; how we process data, with whom we share it and for how long we store it.

We will then review each of your rights, set forth in the GDPR (**General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016**), providing you with the information you need to exercise them.

We are at your service to ensure adequate, timely and rigorous protection of your data.

2. TO WHOM IS THIS NOTICE ADDRESSED?

To each of our **clients**, therefore to you who already have a contractual relationship with us, who are about to establish one.

To each of our **potential customers**, and therefore also to you, who are interested in receiving information about our range of products and services.

This notice is also addressed to all those who, in various capacities, have connections with our customers (e.g. legal representatives, directors, shareholders, beneficial owners, attorneys, delegates or signatories).

Finally, this notice is addressed to those whose data have been provided to us by other parties at the pre-contractual stages or in the performance of a contract.

Its content may concern you as a natural person, sole proprietor or freelancer.

We may need to amend or supplement it, due to regulatory obligations or as a result of organisational changes. You may consult the latest version at any time in the "Privacy" section of our website www.nevasgr.com.

3. WHAT IS DATA PROCESSING? WHO IS THE DATA CONTROLLER?



The GDPR defines "**personal data**" as "any information relating to an identified or identifiable natural person".

The GDPR also defines precisely what is meant by "**processing**", namely "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as 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".

As the "**Data Controller**", Neva, acting in full compliance with the principles of fairness, lawfulness and transparency, determines the means and purposes of each of these "operations" that involve, even only potentially, your personal data; it does all this while ensuring your confidentiality and fully protecting your rights.

4. WHAT PERSONAL DATA DO WE PROCESS?

The personal data we process and protect belong to the following categories:

- a. **identification and personal data**, such as your name and surname, business name, tax code, VAT number, date and place of birth, address of residence/domicile, tax domicile, correspondence address, sex, nationality and data relating to identification documents;
- b. **image data**, such as a photograph on an identification document;
- c. **contact details**, such as landline and mobile phone numbers, ordinary and certified e-mail addresses;
- d. **data on personal and family situation**, such as marital status and household composition;
- e. **financial data**: economic, capital and credit data;
- f. **data relating to the relationships you have with us**, such as transaction data, your reference branch, your classification according to the European MIFID Directive;
- g. **judicial data** relating to criminal convictions and offences or security measures.



5. WHY ARE WE ASKING YOU TO PROVIDE US WITH YOUR DATA?

We need your data to prepare, conclude and properly perform contracts and to fulfil the relevant legal obligations.

If you decide not to provide us with your data, we will be unable to provide you with our services.

6. FROM WHOM DO WE COLLECT YOUR DATA? HOW DO WE PROCESS THEM?

The data we process may originate:



Directly: if you communicated them to us on the occasions when you interacted with us;

Indirectly: if we have collected them from third parties or from sources accessible to the public (e.g. the Chamber of Commerce and Professional Registers), in compliance with the relevant regulations.

We take care of your data in any case: we process them using manual, computerised and telematic tools – including artificial intelligence systems, as defined by current regulations – and we guarantee their security and confidentiality.

In some cases, we may also process your data by means of profiling techniques, in compliance with the principles of the GDPR. In particular, if profiling activities are aimed at fulfilling legal obligations, we adhere to the criteria set forth by the respective regulations.

If profiling takes place as part of a fully automated decision-making process, you will be provided with specific information and, if necessary, we will request your explicit consent in compliance with the provisions of article 22 of the GDPR "Automated individual decision-making, including profiling".

We may carry out customer classification activities based on a legal obligation for the identification of "professional investors."

7. WHAT IS THE BASIS FOR OUR PROCESSING? FOR WHAT PURPOSES DO WE PROCESS YOUR DATA?

The processing of personal data is only lawful if its purpose is supported by a valid legal basis, i.e. one of those provided for in the GDPR.

In accordance with the various legal bases provided, we will briefly explain the processing we carry out and the purposes we pursue.

THE LEGAL BASIS	OUR PURPOSES
b) Contract and pre-contractual measures (Art. 6.1(b) of the GDPR)	 We <u>provide</u> the services requested and perform the contracts or deeds relating to the pre-contractual phases.
c) Legal obligation (Art. 6.1(c) of the GDPR)	 We <u>comply</u> with regulatory requirements, for example in the field of taxation and anti-money laundering, anti-corruption. We <u>comply</u> with Authority provisions, for example in relation to monitoring of operational risks at banking group level. In particular, if regulatory requirements involve profiling activities, we adhere to the criteria set forth by the respective law provisions.
d) Legitimate interest (Art. 6.1(f) of the GDPR)	 We <u>pursue</u> the legitimate interests of ourselves or of third parties, which are shown to be lawful, concrete and specific, after having ascertained that this does not compromise your fundamental rights and freedoms. These include, for example, security of IT systems and networks, the carrying out of corporate or strategic operations and the production of statistics. In some specific cases, the processing may involve profiling activities. The complete list of the legitimate interests that we pursue is described in the annex "Legitimate interests".

8. WHO MIGHT RECEIVE THE DATA YOU PROVIDED?

We may disclose your data to other parties, both within and outside the European Union, but **only for the specific purposes indicated in the notice according to the legal bases provided by the GDPR**.

The recipients of your data may be:

- the **Authorities** and the parties to whom the communication of the data is due in compliance with **regulatory obligations**;
- the **public information systems** of public administrations. These include the Tax Database - Archive of relations with financial operators;
- parties **belonging to the Intesa Sanpaolo Group**, with which, inter alia, suspicious transaction reports forwarded to the UIF (Financial Intelligence Unit within Banca d'Italia) are shared;
- parties with whom we have **commercial agreements**;
- parties which act as our **intermediaries and agents**;
- parties that operate **in the following sectors**:
 - banking, financial and insurance services;
 - tax collection and treasury management;
 - provision and management of IT and telecommunications procedures and systems;
 - ICT security;
 - the professions (e.g. appraisers, notaries and lawyers, inclusive of litigation services);
 - auditing of accounts and consultancy in general;
 - management of customer relations (e.g. in relation to communication and assistance);



- logistics;
- the storage of data and documents (both on paper and electronic media).

A detailed list of the recipients of personal data is available from our branches on request.

9. HOW DO WE PROTECT YOUR DATA WHEN WE TRANSFER THEM OUTSIDE THE EUROPEAN UNION OR TO INTERNATIONAL ORGANISATIONS?

We normally process your data within the European Union, but **for technical or operational reasons**, we may however transfer data to:

- countries outside the European Union or international organisations which, as determined by the European Commission, ensure an adequate level of protection;
- other countries, based, in this case, on one of the "adequate safeguards" or one of the specific derogations provided for in the GDPR.



10. HOW LONG DO WE KEEP YOUR DATA?



If you become our **customer**, we are legally required to keep your data for a period of 10 years from the termination of the contractual relationship. We will process it for a longer period only in cases expressly provided for by law or to pursue a legitimate interest, either our own or that of third parties.

If you do not become our customer, we will keep your data for the period strictly necessary to respond to your request for information about our range of products and services and/or for a follow-up contact. We will process it for a longer period only in cases expressly provided for by law or to pursue a legitimate interest, either our own or that of third parties, or if you subsequently become our customer.

11. HOW CAN YOU CONTACT US?

These are the details for contacting us:

- Data Controller: Neva Società di Gestione del Risparmio S.p.A.
- Registered Office: Corso Castelfidardo 22, 10128 Torino
- dpo@intesasanpaolo.com
- privacy@pec.intesasanpaolo.com
- www.nevasgr.com

12. WHO IS THE "DATA PROTECTION OFFICER"? HOW CAN YOU CONTACT HIM/HER?



The "Data Protection Officer" (DPO) is a guarantee figure that we have appointed, as explicitly required by the GDPR. You can contact the DPO for all matters relating to the processing of your personal data and to exercise your rights under the GDPR, by emailing dpo@intesasanpaolo.com or the certified e-mail address privacy@pec.intesasanpaolo.com.

13. WHAT ARE YOUR RIGHTS?

The GDPR grants you, under Articles 15–22 and 77, the rights described below, which you may exercise in accordance with the specific characteristics of the processing activities outlined in this privacy notice:



Right to object (pursuant to article 21 of the GDPR): if your personal data are processed by us for direct marketing purposes, you have the right to object to the processing and any profiling activities related to them at any time; if you exercise this right, your personal data will no longer be processed for this purpose.

You can also exercise the right to object to the processing we carry out to perform tasks in the public interest, to exercise public powers or to pursue a legitimate interest of ourselves or third parties. In such cases, the processing will no longer be carried out unless there are reasons that oblige us to continue or it is necessary to establish, exercise or defend a right in court.



Automated decision-making including profiling (pursuant to art. 22 GDPR): We do not normally make decisions based solely on automated processing of your personal data except in specific areas and only when the decision relates to the finalisation or performance of a contract, when it is based on your explicit consent or is authorised by law.

In the first two cases (contract and consent) we guarantee your right to obtain human intervention, to express your opinion and to object to the decision.

You always have the right to receive meaningful information on the logic used and the importance and consequences of automated processing.



Right of access (pursuant to article 15 of the GDPR): you have the right to obtain confirmation as to whether or not personal data concerning you is being processed by us, to have information on the processing in progress and to receive a copy of the data.



Right to erasure (pursuant to art. 17 of the GDPR): the GDPR provides for a series of cases in which you have the right to obtain the erasure of personal data concerning you (for example, if you have exercised your right to object to the processing, if the data is no longer necessary for the purposes for which it was processed or if you have withdrawn the consent on which the processing is based and there is no other legal basis for processing it).



Right to restriction (pursuant to art. 18 GDPR): the GDPR provides for a number of cases in which you have the right to request the limitation of the processing of personal data concerning you (e.g. for the period necessary to carry out appropriate checks on personal data whose accuracy you have contested).



Right to data portability (pursuant to art. 20 GDPR): the GDPR provides for a number of cases in which you have the right to receive the personal data you have provided us with and which concern you in a structured, commonly used and machine-readable format. The GDPR also protects your right to transmit those data to another data controller without hindrance on our part.



Right to rectification (pursuant to art. 16 GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you, and the integration of incomplete data.



Right to lodge a complaint (pursuant to art. 77 GDPR): if you consider that your data is being processed by us in breach of the law on the processing of personal data, you have the right to lodge a complaint with the competent Data Protection Authority.

Your rights are described in the document "Focus on your rights" available in the "Privacy" section of the website www.nevasgr.com.

14. CONTACTS AND FORMS FOR THE EXERCISE OF YOUR RIGHTS



On the website www.nevasgr.com you will find a form that you can use to exercise your rights.

To exercise your rights, you may write to:

- dpo@intesasampaolo.com
- privacy@pec.intesasampaolo.com
- Neva Società di Gestione del Risparmio S.p.A. c/o Intesa Sanpaolo S.p.A., Piazza San Carlo, 156 – 10121 Torino.

We will carry out all necessary actions and communications **free of charge**. Only if your requests prove to be manifestly unfounded or excessive, in particular due to their repetitive nature, may we charge you a fee, taking into account the administrative costs incurred, or refuse to comply with your request.

ANNEX 1 - LEGITIMATE INTERESTS

Article 6.1(f) of **REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 (GDPR - General Data Protection Regulation)** authorises us to process personal data concerning you without the need to ask for your consent, where the processing is necessary for the pursuit of a legitimate interest of ourselves or third parties, provided that the interest does not override your interests or fundamental rights and freedoms.

With this document, we provide you with an up-to-date list of **legitimate interests** of ourselves or of third parties that we pursue in connection with our operations, including, where applicable, by means of **classification** or **profiling** techniques.

We remind you that, pursuant to article 21 of the GDPR, you have the **right to object to the processing of personal data concerning you at any time, if the processing is performed for the pursuit of our interests, including profiling**.

Should you **object**, we will refrain from processing your personal data further unless there are legitimate reasons to proceed with the processing (reasons that override your interests, rights and freedoms), or the processing is necessary for the establishment, exercise or defence of legal claims.

For comprehensive information on the rights that the GDPR recognises in relation to the processing of your personal data, please refer to the "Focus on your rights" document in the "Privacy" section of the website www.nevasgr.com.

List of legitimate interests:

- **monitoring the security of IT systems** and networks to protect the confidentiality, integrity and availability of personal data;
- adoption of appropriate safeguards to **prevent fraud** and **mitigate other risks** (e.g. with regard to corporate administrative liability, anti-money laundering and anti-corruption) required to fulfil legal obligations;
- **the exercise and defence of a right** (including the right of claim), in any place;
- **transmission** of personal data **within the group of companies** for internal administrative purposes;
- **processing of personal data belonging to third parties** in the context of the performance of agreements and/or contracts with the Company's counterparties, inclusive of the pre-contractual phase;
- **carrying out activities not attributable to the performance of contracts but relevant to client relationships** (e.g. client care and assistance);
- **management of corporate and strategic operations** such as, for example, mergers, demergers, transfers of business units, credits or legal relationships, where necessary also through the analysis of objective parameters (e.g. age, residence, type of products managed) and/or related to the clients that allow to define the subjective scope of such operations.
- development, customisation and training of **artificial intelligence models**, useful for improving and optimizing the processes of the Intesa Sanpaolo Group;
- **development and updating of predictive and descriptive models** also through the production of statistics and reports with the following aims:
 1. definition of new products and services;
 2. verification of the performance of products and services for their improvement;
 3. verification of the effectiveness of processes and/or the operation of units;
 4. data quality improvement;
 5. determination of fees on contractual relationships with third parties (e.g. suppliers, agents, etc.).