

Personal Data Protection Notice for company representatives and contact persons

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Updated on 03.03.2026

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 natural persons who, in any capacity, **represent, manage, participate in, or act on behalf of companies and business initiatives** (hereinafter, the "Companies") within the scope of Neva's activities aimed at identifying and analysing investment opportunities and strategic development in favor of such entities. These categories of data subjects include: **legal representatives, directors, shareholders, corporate officers, contact persons, and other individuals designated by the Companies.**

We may need to amend or supplement it, due to regulatory obligations or because 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 data**, such as first and last name, the role held by the individual within the Company; tax identification number, date and place of birth, residential/domicile address, correspondence address;
- b. Contact data**, such as landline and/or mobile phone numbers, email address;
- c. Judicial data** relating to criminal convictions, offenses, or security measures, to the extent that their collection is necessary to comply with legal obligations.

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

The data we process may originate:

- **Directly**: collected directly from you;
- **Indirectly**: collected from the Company you belong to and/or from public or private sources (e.g., the Business Register), in compliance with applicable regulations.

6. 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.

<i>THE LEGAL BASIS</i>	<i>OUR PURPOSES</i>
<p><i>b) Contract and pre-contractual measures</i> (Art. 6.1(b) of the GDPR)</p>	<p>The data we process are strictly connected and instrumental to carrying out activities related to the evaluation of the Company for a potential investment by the Funds managed by Neva SGR. Their processing is legally based on the performance of pre-contractual measures, pursuant to Article 6(1)(b) of the GDPR; therefore, if the data are not provided, the Data Controller will not be able to engage with your Company for the assessment of its application.</p>
<p><i>c) Legal obligation</i> (Art. 6.1(c) of the GDPR)</p>	<p>We comply with regulatory requirements, for example, in the context of the due diligence necessary for the evaluation of the Company applying for a potential investment by the Funds managed by Neva SGR.</p>
<p><i>d) Legitimate interest</i> (Art. 6.1(f) of the GDPR)</p>	<p><u>We 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.</p> <p>These include, for example:</p> <ul style="list-style-type: none"> • Ensuring the security of IT systems and networks to protect the confidentiality, integrity, and availability of personal data; • Implementing measures suitable to prevent: <ul style="list-style-type: none"> - fraud and other risks (e.g., regarding corporate administrative liability) in compliance with legal obligations incumbent on the Data Controller; - reputational risk. • Exercising and defending a right in any forum; • Developing and updating predictive and descriptive models through the production of statistics and reporting for the following purposes:

- verifying the effectiveness of processes and/or the operations of organizational units;
- improving Data Quality;
- **Transferring personal data within the corporate group** for internal administrative purposes.

7. 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:

- a) the **Authorities** and the parties to whom the communication of the data is due in compliance with **regulatory obligations**;
- b) parties **belonging to the Intesa Sanpaolo Group**;
- c) parties that operate **in the following sectors**:
 - provision and management of IT and telecommunications procedures and systems;
 - ICT security;
 - the storage of data and documents (both on paper and electronic media).

The list of Companies and third parties outside the Intesa Sanpaolo Group that receive your data is constantly updated and can be requested by writing to the following email address: privacy@pec.intesasanpaolo.com.

The entities referred to in the previous points process your personal data, depending on the specific activities, either as Data Processor, or as an independent Data Controller or Joint Data Controller.

8. 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.

9. HOW LONG DO WE KEEP YOUR DATA?

We keep your data for the period strictly necessary to pursue the purposes for which they were collected. Your personal data will be kept for a maximum period of 10 years from the receipt of the application. We will process them for a longer period only in cases expressly provided for by law or to pursue a legitimate interest, either ours or that of third parties.

10. 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
- privacy@pec.intesasanpaolo.com
- www.nevasgr.com

11. 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:

 <p>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.</p> <p>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.</p>	 <p>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.</p>
 <p>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.</p> <p>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.</p> <p>You always have the right to receive meaningful information on the logic used and the importance and consequences of automated processing.</p>	 <p>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).</p>
 <p>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).</p>	 <p>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.</p>
 <p>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.</p>	 <p>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.</p>

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

12. 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:

- privacy@pec.intesasanpaolo.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.