

## Privacy and Cookie Policy

This section sets out how the site is managed in relation to the processing of the personal data of users who consult it.

This Policy is also provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 to those who interact with the web services offered by the Company in its capacity as Neva Società di Gestione del Risparmio S.p.A., with registered office at Corso Castelfidardo 22, 10128 Turin, Italy, in its capacity as Data Controller (hereinafter the "Company" or "Data Controller"), accessible electronically from the address:

[www.nevasgr.com](http://www.nevasgr.com)

This document also takes into account Recommendation No. 2/2001 that the European Data Protection Authorities have adopted to identify the minimum requirements for collecting personal data online.

This Policy is provided only for the site [www.nevasgr.com](http://www.nevasgr.com) and not for other websites that may be consulted by the user via links.

## Data, purpose and method of processing

The processing operations connected to the web services of this site are carried out only by technical personnel of the service authorised to process data and are communicated to third parties only if necessary for this purpose. The personal data provided by users who request dispatch of informative material are used only to perform the service or provision requested and are communicated to third parties only where this is necessary for that purpose.

Personal data are processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent the loss of data, unlawful or incorrect use and unauthorised access.

## Browsing data

The computer systems and software procedures used to operate this website acquire, during their normal operation and for the sole duration of the connection, some personal data whose transmission is implicit in the use of Internet communication protocols (so-called browsing data).

This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) addresses of the resources requested, the time 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 (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

These data are processed for the following purposes:

- provisions issued by Supervisory and Control Bodies, also in relation to obligations to monitor operational and credit risks at banking group level; the processing of your Personal Data to comply with regulatory requirements is mandatory and your consent is not required.

- to pursue a legitimate interest of the Companies or third parties where such interests do not conflict with the interests or fundamental rights and freedoms of the data subjects (Article 6.1, letter f) of Regulation (EU) 679/2016), namely:
  - to ascertain liability in the event of hypothetical computer crimes against the site and for investigations in the event of possible litigation;
  - to pursue any further legitimate interests. In the latter case, the Data Controller may process your Personal Data only after having informed you and ascertained that the pursuit of its own legitimate interests or those of third parties does not compromise your fundamental rights and freedoms.and your consent is not required.

The data collected on browsing will remain on the servers for a period of 12 months. Personal data may also be processed for a longer period in the event of the occurrence of an act interrupting and/or suspending the limitation period justifying the extension of data retention.

### **Data provided voluntarily by the user**

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this website entails the subsequent acquisition of the sender's address, which is necessary to respond to requests, as well as any other personal data included in the message. The provision of personal data is optional, but it is a strictly necessary condition for the management of the requests made by the subject and for the performance of the services offered.

### **COOKIES**

Cookies are short strings of text that are sent from the website server to the website user's browser and are automatically saved on the user's computer. The text stores information that the website can read when it is consulted at a later date. The main purpose of these cookies is to make browsing the site more user-friendly.

This website only uses technical and aggregate analytical Cookies, which are used to save the user's session and to carry out other activities strictly necessary for its operation. The website may also use Cookies to save browsing preferences and optimize the browsing experience. These cookies include, for example, those for setting the language and currency or for the management of aggregate and anonymous statistics by the owner of the website.

In particular, the IP address collected by these cookies is anonymised so that it cannot be traced back to individual users.

The user's consent is not required for these cookies, as they are necessary for the use of the website and the provision of services.

This website functions optimally if cookies are enabled. However, you can use your browser's configuration tools to prevent cookies from being set on your computer. If cookies are completely disabled, this may disable certain features of the website or prevent it from working properly altogether. Even with all cookies disabled, your browser will continue to store a small amount of information, which is necessary for the basic functionality of the website. You can refer to the website of the manufacturer of the browser you are using for information on how to change your cookie settings.

## RIGHTS OF THE DATA SUBJECT

The data subjects have the right at any time to exercise their rights under the Regulation (right of access, rectification, cancellation, restriction of processing, data portability, objection) vis-à-vis the Data Controllers. All requests relating to the exercise of the aforementioned Articles 15 - 22 of the Regulation may be made by sending an appropriate request in writing to the email address [dpo@intesasampaolo.com](mailto:dpo@intesasampaolo.com) or to the certified email address [privacy@pec.intesasampaolo.com](mailto:privacy@pec.intesasampaolo.com); by post to Neva Società di Gestione del Risparmio S.p.A. c/o Intesa Sanpaolo S.p.A. - Tutela Aziendale Privacy, Piazza San Carlo, 156 - 10121 Turin.

This document constitutes the "**Privacy Policy**" of this website, which will be subject to updates.