

**PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF THE REGULATION (EU) 2016/679 (GDPR) – WEBSITE**

First layer

We hereby provide you with the most important information on our current practices applicable to the processing of your personal data (the “Personal Data”) collected by Kervis SGR S.p.A. (“Kervis SGR”, “we”, or “us”), through the website [www.kervisgr.com](http://www.kervisgr.com) (the “Website”), as further detailed in the “Second Layer – Detailed information on the processing document” (the “Privacy Notice”).

<b>Controller</b>
<b>Kervis SGR S.p.A. with registered office in Milan, via Privata Fratelli Gabba, 1/A – 20121, Italy</b>

<b>Categories of Personal Data</b>	<b>Purpose of the processing / How we use your Personal Data</b>	<b>Legal Basis</b>
‘Contact’ section: name, surname, e-mail address, and other information in your message	We will process the Personal Data you made available to us in your message submitted to the e-mail address <a href="mailto:info@kervisgr.com">info@kervisgr.com</a> or <a href="mailto:kervisgrspa@legalmail.it">kervisgrspa@legalmail.it</a> to provide you with any information requested and to attend any queries	Legitimate interest
‘How do I file a claim?’ section: name, surname, e-mail address, and other information included in or connected to your claim (e.g., type of complaint, date of receipt, our evaluation, actions taken and outcome, closing date)	We will process the Personal Data you made available to us in your claim submitted to the e-mail address <a href="mailto:reclami@kervisgr.com">reclami@kervisgr.com</a> or <a href="mailto:kervisgrspa@legalmail.it">kervisgrspa@legalmail.it</a> to record your claim in the complaints register and to provide you with an adequate response	Legal obligation

<b>Your rights</b>
You have the right to obtain from us confirmation as to whether or not your Personal Data are being processed by us, and, where that is the case, you have the right to request us access to and rectification or erasure of the same or restriction of processing, and to object to processing at any time
You have the right to lodge a complaint with the competent supervisory authority

<b>Data retention</b>
Your Personal Data collected by Kervis SGR in connection with the ‘Contact’ section will be retained for a period of 30 days.
Your Personal Data collected by Kervis SGR in connection with the ‘How do I file a claim?’ section will be retained for a period of 30 days.

## PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF THE REGULATION (EU) 2016/679 (GDPR) – WEBSITE

Second Layer – Detailed information on the processing

We hereby inform you on our current practices applicable to the processing of your personal data (the “**Personal Data**”) collected by Kervis SGR S.p.A. (“**Kervis SGR**”, “**we**”, or “**us**”) through the website [www.kervissgr.com](http://www.kervissgr.com) (the “**Website**”).

### 1. Controller and contact details

Kervis SGR S.p.A. with a sole shareholder  
Via Privata Fratelli Gabba n. 1/A  
20121, Milan, Italy  
Fiscal code and VAT: 10562400969

E-mail: [privacy@kervissgr.com](mailto:privacy@kervissgr.com)

### 2. Categories of Personal Data

The term Personal Data refers to the data you provide to Kervis SGR through the Website. Such Personal Data include:

#### ‘Contact’ section

When you contact us via the e-mail address [info@kervissgr.com](mailto:info@kervissgr.com) or [kervissgrspa@legalmail.it](mailto:kervissgrspa@legalmail.it) with information requests or queries, we will collect your name, surname, e-mail address, and other information you elect to share with us in your message.

#### ‘How do I file a claim?’ section

When you file a claim via the e-mail address [reclami@kervissgr.com](mailto:reclami@kervissgr.com) or [kervissgrspa@legalmail.it](mailto:kervissgrspa@legalmail.it) we will collect your name, surname, e-mail address, and we will process other information included in or connected to your claim (e.g., type of complaint, date of receipt, our evaluation, actions taken and outcome, closing date).

### 3. Purposes of the processing and legal basis

Your Personal Data will be collected and processed for the following purposes:

1. to provide you with any information you have requested and to attend any queries submitted via the e-mail address [info@kervissgr.com](mailto:info@kervissgr.com) or [kervissgrspa@legalmail.it](mailto:kervissgrspa@legalmail.it). The legal basis for processing is our legitimate interest in collecting and maintaining personal information of those who contact voluntarily us with information request; and

2. to record your claim submitted via the e-mail address **reclami@kervissgr.com** or **kervissgrspa@legalmail.it** in the complaints register and to provide you with an adequate response. The legal basis for processing is the compliance with a legal obligation to which Kervis SGR is subject.

The following table summarizes the Personal Data processed by Kervis SGR and the respective purposes of and legal bases for processing.

Categories of Personal Data	Purposes of the processing	Legal Basis
'Contact' section	We will process the Personal Data you made available to us in your message submitted to the e-mail address <b>info@kervissgr.com</b> or <b>kervissgrspa@legalmail.it</b> to provide you with any information requested and to attend any queries	Legitimate interest of Kervis SGR in collecting and maintaining personal information of those who contact voluntarily us with information request
'How do I file a claim?' section	We will process the Personal Data you made available to us in your claim submitted to the e-mail address <b>reclami@kervissgr.com</b> or <b>kervissgrspa@legalmail.it</b> to record your claim in the complaints register and to provide you with an adequate response	Legal obligation to which Kervis SGR is subject

#### 4. Recipients

Your Personal Data are processed by Kervis SGR personnel and, if necessary or functional to fulfilling the purposes indicated above, your Personal Data may be processed by third parties that may also be specifically appointed by us as data processors.

The categories of recipients to whom your Personal Data may be disclosed are the following: (i) IT providers; (ii) for data storage purposes, the holding company Kervis Asset Management S.p.A.; (iii) consultants and professionals in case of potential disputes or if deemed necessary to maintain security, prevent or investigate frauds and abuse; and (iv) public entities and authorities, exclusively for the purpose of fulfilling legal and regulatory obligation.

#### Transfer of data to extra EU/EEA countries

Under certain circumstances, your Personal Data may be transferred to third parties that may also be specifically appointed by us as data processors, also outside the EU/EEA. In such case, we will ensure that Kervis SGR has adopted appropriate safeguards, including standard data protection clauses adopted by the EU Commission in order to guarantee an adequate level of protection, or that derogations for specific situations apply. You may request to obtain evidence of the safeguards implemented by Kervis SGR by contacting us at **privacy@kervissgr.com**.

## 5. Data retention

Your Personal Data collected by Kervis SGR in connection with the ‘Contact’ section will be retained for a period of 30 days.

Your Personal Data collected by Kervis SGR in connection with the ‘How do I file a claim?’ section will be retained for a period of 30 days.

We may retain your Personal Data for a further period in the event it is deemed necessary to comply with our legal obligations, to meet regulatory requirements, to resolve potential or actual disputes, to maintain security, prevent or investigate frauds and abuse.

## 6. Possible consequences for failure to provide Personal Data

The collection of Personal Data relating to your identification and contact information is necessary to attend your queries and/or to record your claim and provide you with adequate feedback.

Failure to provide such Personal Data will have no other effect than to prevent us, as the case may be, from providing you with relevant information and recording your claim.

## 7. Automated decisions

We will not make any decision based solely on automated processing of Your Personal Data which produces legal effects concerning you or similarly significantly affects you.

## 8. Rights of the data subject

You have the right to obtain from us confirmation as to whether or not your Personal Data are being processed by us, and, where that is the case, you have the right to request us access to and rectification or erasure of the same or restriction of processing, and to object to processing at any time.

In case you wish to access or correct your Personal Data, intend to exercise any of your rights, or should you have any questions about this Privacy Notice, you may contact us at [privacy@kervissgr.com](mailto:privacy@kervissgr.com).

## 9. Supervisory authority

In the event of a breach of applicable data protection laws you have also the right to file a complaint with the competent data protection authority. For further information, you may visit <https://www.garanteprivacy.it/>.