

PRIVACY NOTICE

European Regulation 2016/679 (hereinafter "GDPR" or "Regulation") requires Azimut Investment S.A. in its role of controller¹ (hereinafter "**Azimut**", "**We**" or "**Us**"), to inform the users (hereinafter, also, "**Data Subject**" or "**you**") about personal data processing² methods and purposes (hereinafter "personal data"³).

This information notice is provided solely for the website beewiseapp.com (the "**Beewise Website**"), and the education platform, which consists of a specific section of the Beewise Website, available at <https://learningplatform.beewiseapp.com/login> (hereafter the "**Learning Platform**", and collectively referred to as the "**Website**") and it does not concern the Beewise apps and other websites accessible by the user browsing through the links contained within the Website. Please check information notices provided by third- party websites accessible through the Website and identify the applicable terms and conditions concerning the processing of your personal data.

1. Who is the Data Controller and who to contact?

The company that will carry out the processing of your personal data according to the purposes and methods listed below is Azimut Investment S.A. in its role of controller pursuant to article 4,7, of the GDPR.

You will be able to reach Us out and obtain more information about its role and responsibilities by sending an email to: privacy@beewiseapp.com.

Azimut has appointed a Data Protection Officer (DPO) that you may reach out to by sending an e-mail to: dpo@beewiseapp.com.

Azimut may collect and process your Personal Data for the purposes listed within section 2 of this notice.

2. Purpose of the processing and categories of Personal Data processed

2.1 Direct Marketing

In the event you consent to the processing your personal data, We will process your name, surname and email address in order to inform you on (new, initiatives, marketing materials, etc.) via email.

The provision of Personal Data for the aforementioned purpose is optional and Azimut will process your personal data only if expressly and specifically authorised by you. However, any refusal to communicate such Personal Data and any incorrect information given, will makes impossible to carry out the aforementioned activities.

The legal basis of the processing is your consent to processing of your personal data specifically and freely given (Article 6, paragraph 1, letter a) of GDPR).

¹ For the purpose of this notice "controller" shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (article 4, 7), of GDPR).

² For the purposes of this notice, "Personal Data Processing" shall mean any operation or set of operations, which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (article 4, 2), of GDPR).

³ For the purposes of this notice, "Personal Data" shall mean any information concerning an identified or identifiable natural person (article 4, 1) of GDPR).

In any case, you can withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

2.2 Subscription to the Learning Platform

Access to the Learning Platform requires a registration. In the first steps of the registration process, we will ask you to provide Us with your name, surname and your contact data (e-mail address).

The legal basis of the processing of your personal data is the contractual relationship established for providing you the Learning Platform (Article 6, paragraph 1, letter b of GDPR).

The provision of the personal data is necessary to proceed with the registration and account creation process. Without those personal data We will not be able to allow you to access and use the Learning Platform.

2.3 Joining the waiting list

The Beewise app and the related investing platform may not be available in your country yet. However, you can join our waiting list and be informed about its launch as soon as it happens and start using it as soon as possible.

The legal basis of the processing of your personal data is necessary to in order to take steps at your request prior to start using the Beewise app (Article 6, paragraph 1, letter b of GDPR).

2.4 Defend of our rights and interests and litigation management

Where necessary, we may process your personal data to defend our interests and rights before courts or in out court disputes / pre-trial proceedings etc.

The legal basis of the processing of your personal data is our legitimate interest in defending rights, interests, assets related to the Website and managing possible disputes, also potentially and whether inside or outside a court (Article 6, paragraph 1, letter f of GDPR).

3. Duration of the Personal Data processing

Personal Data will be stored for a period of time strictly connected to the pursuing of the purpose for which the data have been collected (Section 2); in any case the criteria used to determine the aforementioned storage period of Personal Data is based on the respect of the data storage periods stated by law and by principles stated by article 5 of GDPR.

In particular, your Personal Data processed for:

- Sending you our Newsletter (Section 2.2.1) shall be stored until you withdraw your consent for the achievement of the aforementioned purpose and, in any case, not later than 24 months starting from the subscription.

At the end the retention period, personal data will be erased or anonymised.

4. Methods of processing and disclosure of Personal Data

The processing of your personal data will be carried out using appropriate tools to ensure security and confidentiality and may be carried out with the through manual, computerized and electronic means for storing, managing and transmitting Personal Data.

Your personal data will be made accessible only to authorized persons, who are expressly in charge and instructed by Azimut to the personal data processing, pursuant to Article 29 of the GDPR.

Furthermore, other trusted companies will carry out the processing of your personal data. These companies perform technical and organizational tasks on behalf of Azimut (e.g. companies operating for the technical management and maintenance of the Website, third parties with whom Azimut collaborates for business services, IT service providers, marketing consultants, referral platforms, lawyers etc.). These companies may act both as autonomous data controller or data processors on behalf of Azimut.

An updated list of the appointed data processor is available by sending an email to privacy@beewiseapp.com.

5. Transfer of Data outside Europe

Your Personal Data is processed by Azimut within the territory of the European Union and, if necessary, for technical or operational reasons Azimut reserves the right to transfer your Personal Data to countries outside the European Union subject to the existence of European Commission "adequacy" decisions, or on the basis of adequate guarantees, or on the specific exceptions provided for by GDPR. In case We transfer your personal data to countries outside the European Union, We will promptly inform you about the safeguards adopted to guarantee the protection of your Personal Data as set out in Chapter IV of GDPR.

6. Rights of the Data Subject

Each Data Subject has:

- a) a right to access to his/her personal information processed by or on behalf of Azimut;
- b) a right to have his/her Personal Data rectified by Azimut if they are incorrect or incomplete;
- c) a right to request the erasure of his/her Personal Data as provided for by article 17 of the GDPR including in the following situations (i) where the Personal Data is no longer necessary in relation to the above described purposes, (ii) the Data Subject objects to the processing of its data and there are no overriding legitimate grounds for the processing, and (iii) the data has been unlawfully processed;
- d) a right to obtain a limitation of the processing of his/her data in accordance with the provisions of article 18 of GDPR;
- e) a right to object to the processing of his/her data in accordance with article 21 of GDPR;
- f) a right to lodge a complaint with the Commission Nationale pour la Protection des Données ("CNPD") in Luxembourg and the relevant authority of the Member State in which the Data Subject resides or works, as well as where the alleged infringement of GDPR took place, in accordance with the provisions of article 77 of the GDPR. In any case, Azimut is interested in being informed of any grounds for complaint and invites to use the above mentioned contact channels before referring to the supervisory authority, so as to be able to prevent and resolve any disputes in a friendly and timely manner, with the utmost courtesy, seriousness and discretion. In any case the list of the supervisory authorities is available [here](#);
- g) a right to receive the Personal Data concerning him or her or to request that it be transmitted to another data controller, when feasible, in accordance with the provisions of article 20 of GDPR;
- h) a right to withdraw the consent where it is the legal basis for the processing of personal data.

At any time, you will be able to exercise your rights by sending an email to privacy@beewiseapp.com.

According to the GDPR, Azimut is not authorized to charge costs for fulfilling one of the requests set out in this paragraph, unless they are manifestly unfounded or excessive, in

particular because of their repetitive character. In cases where you require more than one copy of your personal data, or in cases of excessive or unfounded requests, Azimut may (i) charge a reasonable fee, taking into account the administrative costs of providing the information or (ii) refuse to act on the request. In these cases, Azimut will inform you of the costs before processing the request.

Azimut may request further information before processing requests if it needs to verify your identity.

We may amend this information notice from time to time. Please, visit the Website to ensure that you are always up to date about all processing activities and our compliance with applicable data protection legislation.