

# Beewise Learning Platform - Information Notice - February 2025

Azimut<sup>1</sup> is fully committed to protect and respect your privacy and use your personal data in compliance with the provisions stated by Regulation EU 2016/679 - General Data Protection Regulation (hereinafter “GDPR” or “Regulation”).

Here you will find all the information about how the **BeeWise Learning Platform** collects and process your personal data<sup>2</sup>, how you can exercise your rights and change the way we process your personal data. You will be able to reach Us out and get more information about our role and responsibilities by sending an email to: [privacy@beewiseapp.com](mailto:privacy@beewiseapp.com)

## Who is the Data Controller and how to reach him?

The companies that will carry out the processing of your personal data according to the purposes and methods listed below are Azimut Capital Management S.p.A. and Azimut Investment S.A. (hereinafter “Azimut”, “We” or “Us”) in their quality of joint controllers<sup>3</sup> according to article 26 of the GDPR. You will be able to reach Us out and get more information about our role and responsibilities by sending an email to: [privacy@beewiseapp.com](mailto:privacy@beewiseapp.com)

## Who is the Data Protection Officer and how to reach him?

The Data Protection Officer (“DPO”) is a supervisor, expert in the field of privacy, with the task of overseeing and verifying the effectiveness of the measures that Azimut has developed. Azimut has appointed a DPO, you will be able to reach him out by sending an email to: [dpo@beewiseapp.com](mailto:dpo@beewiseapp.com).

## What personal data do we collect?

In this section you will get more information on which personal data We collect and process during the registration and account creation process and while you are using the BeeWise Learning Platform (hereinafter also the “Platform”).

### 1. Registration and account creation

Necessary requirement to access the BeeWise Learning Platform and take part in the training courses is the completion of the registration and account creation process, during which We will ask you to provide Us some personal data.

You can find more details about the processing of your personal data in the following table.

|  | What personal data do we collect?   | Where do we collect personal data?  | Is necessary to provide those data?  |
|--|---|---|--|
| <b>Registration and account creation</b> | 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). | We will collect the personal data directly from you through the completion of the registration and account creation form. | 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 BeeWise Learning Platform. |

<sup>1</sup>For the purpose of this notice, “Azimut” shall mean Azimut Capital Management S.p.A. and Azimut Investment S.A. in their quality of joint controllers according to article 26 of the GDPR.

<sup>2</sup>For the purpose of this notice, “process of your personal data” 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).

<sup>3</sup>For the purpose of this notice “Joint Controllers” shall mean two or more controllers jointly determining the purposes and means of processing.

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## 2. Information We collect while you are using BeeWise Learning Platform

While you are using BeeWise Learning Platform (participating in our training courses and/or browsing the Platform), We may automatically collect certain information as better detailed in the following table.

|                                   | What personal data do we collect?   | Why do we collect personal data?  |
|-----------------------------------|---|---|
| Registration and account creation | Technical information (pages response times, download errors, length of visits to certain pages of the Platform, information on your interaction with certain pages of the Platform, such as scrolling and clicks). | We collect the information to help you with technical issues, improve the performance of our Platform and protect your account from fraud by detecting unauthorized access (Processing purposes: <u>Providing you services, Information security</u> ). |
|                                   | Your IP address and the operating system of your device.  | We collect the information to protect your account from fraud by detecting unauthorized access (purpose: <u>Information security</u> ).   |

## 3. Processing of anonymous data

Anonymous data are information which, through a data processing technique, are altered so as to render impossible to relate them to an identified or identifiable natural person. Therefore, GDPR does not apply to the processing of such anonymous information.

We may use anonymized or aggregate data for different purposes such as business purpose, including to better understand customer base needs and behaviors, improve our Platform and services, conduct business intelligence activities and marketing, and detect security threats.

Please note that, with the sole exception of this section, none of the other provisions of this information notice applies to anonymized and/or aggregated data.

## Why do we process your personal data?

In this section you will find out more about the purposes for which We collect and process your personal data and the legal basis that allows Us to perform those processing activities in compliance with GDPR.

### 1. Registration and account Creation. Provision of services

We collect and process your personal data for the performance of the contract between you and Azimut concerning the use of BeeWise Learning Platform and to support you regarding any request you sent to [support@beewiseapp.com](mailto:support@beewiseapp.com) (for any technical issues) or to [customerservice@beewiseapp.com](mailto:customerservice@beewiseapp.com).

The provision of personal data for the above-mentioned purpose is necessary, any refusal to provide Us with such data will make impossible for you to use the Platform services or for Us to provide you support regarding any eventual issue for which you requested our help.

The legal basis of above-mentioned processing is the performance of a contract to which the data subject is party or take steps at the request of the data subject prior to entering a contract pursuant article 6, paragraph 1, letter b, of GDPR.

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## 2. Complying with legal obligations

Azimut is subject to various legal obligations pursuant to statutory and regulatory requirements. This covers our processing of your personal data for compliance with applicable laws, compliance with requests from or requirements of local or foreign regulatory enforcement authorities and any other exchange of information regime to which We may be subject to from time to time.

The provision of your personal data to comply with the regulatory provisions is mandatory and your consent is not required.

The legal basis of above-mentioned processing is the compliance with a legal obligation to which the controller is subject pursuant article 6, paragraph 1, letter c, of GDPR.

## 3. Preventing frauds and defend our rights

We collect and process your personal data for preventing frauds and defend our rights. In this way, We aim also to protect you from money loss by ascertaining, preventing and mitigating frauds and/or abuses of the services We provide through the Platform.

Furthermore, We may process your personal data for defend our rights or for defending our self from any legal claim. The processing is not intended to be limited to current legal proceedings but includes processing necessary for:

- prospective proceedings;
- obtaining legal advice; or
- establishing, exercising or defending legal rights in any other way (in Court or in the stages leading to possible legal action).

The legal base of above-mentioned processing is our legitimate interest pursuant article 6, paragraph 1, letter f, of GDPR.

## 4. Information Security

We collect and process your personal data for preventing threats to integrity, availability and confidentiality of your personal data, combat spam or other malwares and, in general, to detect, prevent and mitigate security risks.

The legal base of above-mentioned processing is our legitimate interest pursuant article 6, paragraph 1, letter f, of GDPR.

## How do We process your personal data and to whom do we transfer them?

Personal data are processed manually, electronically or by computer means in such a way as to ensure full security and confidentiality by adopting appropriate security measures to effectively preserve all the information and data from unauthorized access, alteration, destruction or loss, from unauthorized transmission, unauthorized treatment and other abuses.

To achieve the purposes listed in the paragraph above, We might communicate your personal data to the following categories of recipients.

### 1. Third parties

Our trusted partners for supplying and management of information procedures and systems, telecommunication networks and protection and security systems.

The aforementioned third parties shall process your personal data in their capacity as independent data controllers, or as data processors<sup>4</sup> appointed, pursuant to Article 28 of the GDPR, by Azimut. When We use data processors, We ensure that such data processors provide sufficient guarantees to implement appropriate technical and organisational measures and that such processing performed on our behalf meets the requirements of GDPR and ensures the protection of your rights.

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<sup>4</sup> For the purpose of this notice "Data processor" shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Joint Controllers.

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The other entities to which We can communicate your personal data, but who are not appointed as data processor, will process your personal data as autonomous data controllers pursuant to the relevant personal data protection law, handling same on a fully independent basis and/or in connection with the processing performed by Azimut. For more information about the processing of your personal data performed by those entities in their quality of data controller, please refer to the information notice of each data controller. An updated list of third parties identified as data controllers or data processors is available by sending an email at: [privacy@beewiseapp.com](mailto:privacy@beewiseapp.com)

The legal basis of above-mentioned processing is the performance of a contract to which the data subject is party or take steps at the request of the data subject prior to entering a contract pursuant article 6, paragraph 1, letter b, of GDPR.

### 2. Authorities

as may be required or authorized by law (including but not limited to public administrative bodies and local or foreign public and judicial authorities, including any competent regulators).

Please note that your personal data are processed within the territory of the European Union and, if necessary, for technical or operational reasons, We reserve 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.

### How long do we keep your personal data?

Your personal data will be stored within the European Economic Area (EEA) in our providers’ servers for a period of time strictly necessary to the pursuing of each purpose for which the personal data have been collected.

In any case the criteria used to determine the storage period is based on the respect of the personal data storage periods stated by law and by principles set out by article 5 of GDPR. In general, some personal data may be retained even after the end of activities in your comparisons for the time necessary to allow Azimut to comply with contractual and legal obligations. Luxembourg law relating to anti-money laundering for example requires that documents are retained for a period of five or ten years (depending of the specific processing) after the relationship has come to an end.

In any case, at the end the retention period, personal data will be erased or anonymized.

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### What are your rights?

According to article 15 to 22 of GDPR, you have the right, at any time, to:

- a) request Us to access to your personal data processed by Us or on our behalf by our data processors;
- b) request Us to rectify your personal data in case they are incorrect or incomplete;
- c) request Us the deletion of your personal data in accordance with the provisions of article 17 of GDPR including in the following situations (I) where personal data are no longer necessary for the use of the Learning Platform, (II) you objects to the processing of your personal data and there are no over riding legitimate grounds for the processing, and (III) the personal data has been unlawfully processed;
- d) request a restriction of the processing of your personal data in accordance with the provisions of article 18 of GDPR;
- e) object to the processing of your personal data;
- f) lodge a complaint with the Commission Nationale pour la Protection des Données (“CNPD”) in Luxembourg and the Garante per la protezione dei dati personali in Italy and the relevant authority of the Member State in which you reside or work in accordance with the provisions of article 77 of GDPR;
- g) receive your personal data or request the transmission to another data controller, when feasible, in accordance with the provisions of article 20 of GDPR.

At any time, you will be able to exercise your rights by sending an email to [privacy@beewiseapp.com](mailto:privacy@beewiseapp.com)

### Privacy notice updates

We are constantly committed to improve the level of protection of your personal data and the respect of your privacy therefore We may amend, integrate or update, this privacy notice from time to time. We will notify you of changes We made to the privacy notice through pop up and, in any case, you can go in BeeWise privacy section or visit the website <https://beewiseapp.com/policies/> to ensure that you are always up to date about all processing activities and our compliance with applicable data protection legislation.

### Thirs parties' websites and services

While using BeeWise Learning Platform you may run into links to third parties' web sites and services. The present privacy notice does not refer to any personal data processing performed by those third parties. Azimut has no control and responsibility for the personal data processing eventually performed by third parties through their websites and/or services. For more information about the processing performed by third parties, please refer to the privacy policy of any third party.