

INFORMATION NOTICE

European Regulation 2016/679 (hereinafter "**GDPR**" or "**Regulation**") requires Azimut Capital Management S.p.A. and Azimut Investment S.A. in their quality of joint controllers¹ (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, (hereinafter "**Website**") and it does not concern 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 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. in their quality of joint controllers pursuant to article 26 of the GDPR.

You will be able to reach Us out and obtain more information about our 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. Please note that the We process Personal Data as joint controllers with reference to these cases.

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

2.1 Personal Data collected during the web browsing

Servers and software procedures aimed to correct functioning of this Website collect Personal Data during ordinary functioning. The transmission of Personal Data is implicit due to the use of Internet communication protocols. These data are not collected in order to be associated with identified Data Subject, however they could allow the identification of users through the elaboration and association with other data owned by third parties.

This category of Personal Data includes IP addresses or domain names used by users to connect to the Website, URI addresses (Uniform Resource Identifier) of requested

¹ For the purpose of this notice "Joint Controllers" shall mean two or more controllers jointly determining the purposes and means of processing.

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).

resources, the time of the request, the method used to process the request to the server, the size of the file received, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to operating systems and the user's IT environment.

This data is used for the sole purpose of obtaining anonymous statistical information related to the use of the Website and to check its correct functioning.

2.2 Personal Data voluntarily provided

2.2.1 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 you [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.

3. Legal basis of the processing

3.1 Personal Data collected during the web browsing

The legal basis of the processing of your Personal Data collected during the web browsing (Section 2.1) is the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject before entering into a contract (Article 6, paragraph (i), letter (b) of GDPR).

3.2 Personal Data voluntarily provided

3.2.1 Direct marketing

The legal basis of the processing of the Personal Data that you provided (Section 2.2.2) is your consent to processing of your personal data specifically given for the purpose described in Section 2.2.2. (Article 6, paragraph 1, letter a) of GDPR).

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

4. 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.

5. 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, etc.). Azimut has appointed the aforementioned companies as external data processors pursuant to Article 28 of the GDPR.

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

6. 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 article 47 of GDPR.

7. 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;
- 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 in accordance with the provisions of article 77 of the GDPR;

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.

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

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.