

PRIVACY POLICY ON THE WEBSITE

This information is given to natural persons who access and use this website pursuant to art. 13 of Legislative Decree. 196/2003 "Code on the protection of personal data" and s.m.i. and art. 13 - 14 of EU Regulation 2016/679 "European Regulation on the protection of personal data" to inform them of the essential elements of the processing carried out.

Data controller

The Data Controller is Azimut management based in 10/22, Square Charles-Maurice Wiser - Charles-Maurice Wiserplein B - 1040 Bruxelles - Brussel in the person of its owner Benincasa Stefano.

Data Processors and Data Processors

The updated list of data processors and data processors is kept at the headquarters of the Data Controller.

Source of data and indication of personal data subject to processing:

The data processed by the data controller are acquired through the compilation by the data subject of appropriate fields on the website, or automatically through the access and use of the website by the user.

The data acquired by the data controller are as follows:

- name, surname, company name, telephone number, address and -mail, address of residence/domicile;
- navigation data acquired by computer systems and software procedures for the operation of the Website (e.g. IP addresses, computer domain name...);
- cookies.

Purpose of processing

The collection and processing of personal data is carried out in order to:

1. verify the identity of the applicant for information, estimates and the provision of services;
2. transmit information explicitly requested by the data subject;
3. to fulfil orders or provide the services requested by the person concerned or by a person appointed by him (provision of the service);
4. send marketing communications, promotions, advertising, market surveys regarding the products marketed or services (marketing);
5. send marketing communications, promotions and advertising via e -mail regarding products and services similar to those requested by the data subject or his representative (soft spam);
6. create a profile through the use of profiling cookies, where accepted (profiling);
7. comply with legal obligations (compliance);
8. to protect the interests of the company, also legally both out of court and judicial;
9. prevent or detect any abuse in the use of the site or any fraudulent activity.

Legal basis and compulsory or optional nature of processing

The data processed for the purposes referred to in points 1, 2, 3, 7, 8, 9 of the paragraph called "Processing purposes" are essential for the establishment of the contractual relationship (including the pre-contractual phase) and/or for its execution.

The data processed for the purposes referred to in points 4 and 6 do not derive from an obligation and their provision is optional and is based on the consent of the interested party.

The data referred to in point 5 are not mandatory and do not require consent for their processing, however the data subject can object at any time.

The extent and appropriateness of the Data provided will be assessed from time to time, in order to determine the resulting decisions and avoid the processing of Data exceeding the purposes pursued.

Retention period

The personal data collected and processed by the Data Controller will be kept in full compliance with current legislation as defined below:

- provision of services: will be kept for the time strictly necessary for the pursuit of these purposes and also for a longer period in order to protect the interests of the company;
- marketing and profiling: will be kept until the withdrawal of consent;
- soft spam: will be stored until the data subject does not oppose the processing by the procedure indicated in each single soft spam mail;
- compliance: will be kept for the period defined by the relevant legislation;
- abuse or fraud: will be kept for the time strictly necessary for this purpose and therefore until the study is required to protect them legally and to communicate them to the competent authorities;

Place of storage of data

The data are currently processed and stored at the headquarters 10/22, Square Charles-Maurice Wiser - Charles-Maurice Wiserplein B - 1040 Brussels - Brussel.

They are also processed on behalf of the undersigned by professionals and/ or companies responsible for carrying out technical activities, management, development, administrative, accounting, tax, legal etc.

The Firm also reserves the right to use servers, cloud and other computer tools for storing and managing personal data owned or managed by third parties ensuring that service providers will be selected from those who provide adequate guarantees, as

¹ for a more detailed knowledge of the rights of the Data Subject, please consult D.Lgs. 196/2003 "Code on the protection of personal data" and s.m.i. the EU Regulation 2016/679 "European Regulation on the protection of personal data".

required by art. 46 of EU Regulation 2016/679 "European Regulation on the protection of personal data".

Rights of the Data Subject

At any time the interested party may exercise pursuant to art. 7 of D. Lgs. 196/2003 and articles 15 to 22 of EU Regulation 2016/679 the ^{right} to:

1. **Access your own data.** The Data Subject may at any time request and obtain from the Data Controller information on the personal data processed (including the existence of an ongoing processing of personal data concerning him), he also has the right to access it pursuant to art. 15 of EU Regulation 2016/679, and extract a copy, provided that the rights and freedoms of others are not violated.
2. **Verify and rectify your data.** The Data Subject has the right to verify the correctness of their data, to obtain the updating, correction and integration of inaccurate personal data concerning them, without undue delay, as established by art. 16 of EU Regulation 2016/679.
3. **Obtain cancellation (Right to be forgotten).** The interested party if the conditions indicated in art. 17 of the EU Regulation 2016/679 may require the cancellation of your data by the Data Controller.
4. **Obtain limitation of processing.** When the conditions referred to in art. 18 of EU Regulation 2016/679 are met, the interested party may request the restriction of data processing. In this case, the Data Controller may not process the data for any other purpose than their storage or for "the establishment, exercise or defence of a right in court or to protect the rights of another natural or legal person or on grounds of a major public interest of the Union or a Member State".
5. **Get the data portability.** The Data Subject has the right to receive their data in a structured format, commonly used and readable automatic device and where technically feasible to request and obtain, without obstacles, their transfer to another Data Controller.
6. **Object to data processing.** Where personal data have been processed for the purposes "of performing a task of public interest or relating to the exercise of public authority by the controller" or "the processing is necessary for the pursuit of the legitimate interest of the controller or third parties provided that the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, in particular if the data subject is a minor", the data subject may object to the processing on grounds related to his or her particular situation. The Data Subject may also at any time oppose the processing for direct marketing purposes, without the need to indicate the specific reasons.
7. **Make a complaint.** If the interested party believes that the processing of their personal data is carried out in violation of EU Regulation 2016/679 "has the right to lodge a complaint with a supervisory authority, in particular in the Member State in which he habitually resides, works or where the alleged infringement occurred".
8. **Oppose automated decision making.** The Data Subject may object to the fully automated processing of their personal data, including profiling, unless such form of processing is necessary for the purpose of concluding and/or performing the contract, is provided for by current legislation or is conducted following the explicit consent of the data subject, who may revoke it at any time.
9. **Withdraw your consent at any time. The Data Subject may revoke consent to the processing of data at any time. The withdrawal of consent does NOT, however, affect the lawfulness of the processing based on the consent given before the withdrawal;**

The Data Subject exercises his rights by writing to the Data Controller at the above address or by certified e-mail at sb@azimutmanagement.eusspecifying [the subject of his request, the right it intends to exercise and attaching a photocopy of the identity document attesting the legitimacy of the request](#)

¹for a more detailed knowledge of the rights of the Data Subject, please consult D.Lgs. 196/2003 "Code on the protection of personal data" and s.m.i. the EU Regulation 2016/679 "European Regulation on the protection of personal data".

Data transfer

For all the purposes indicated in this information, the personal data of a common nature of the interested party will not be communicated to others.

Automated decision-making processes

The Data Controller does not carry out on the data of natural persons operating in the name and on behalf of suppliers processing which consist in automated decision-making processes.

Amendments

This Policy has been in force since 07/04/2022. Adverum reserves the right to modify or simply update the content, in part or completely, also due to changes in the applicable legislation.

Adverum will inform you of such changes as soon as they are introduced and they will be binding as soon as they are published on the Site.

Adverum therefore invites you to regularly visit this section to take note of the most recent and updated version of the Policy in order to be always updated on the Personal Data collected and on the use it makes of it.

The Data Controller

Stefano Benincasa

¹for a more detailed knowledge of the rights of the Data the EU Regulation 2016/679 "European Regulation on t