

INFORMATION

Provided as per articles 13 and 14 of the EU Regulations 2016/679 (“GDPR”) and relative national enactment provisions, relative to the processing and protection of personal data and concerning the circulation of such data, repealing Directive 95/46/CE.

The European Regulation 2016 / 679 (“**GDPR**”) and the Italian enactment provisions require that the companies of the Azimut Group and in particular, for the purposes of the present information notice, those companies listed in the point 5 below, (hereinafter the “**Group Companies**”), to inform clients (hereinafter the “**Data Subject**”) about all the modalities and aims for the processing of personal data (hereinafter “**Personal Data**”¹) in their possess and transmitted / communicated by the Data Subject.

The GDPR requires an explicit consent expressed by the Data Subject for the processing of certain categories of Personal Data – listed in Article 9 of the same GDPR – as for instance any data related to the health or biometric data.

1. **Modality for the Processing and the Communication of Personal Data.**

The Processing² of Personal Data, which are collected, also directly from the Data Subjects, by the Group Companies whether or not through employees or financial planners / advisors enabled to the offering of financial products off-premises, or by collaborators of the same, will take place for the following aims:

- a) aims related to the accomplishment of obligations provided by, or arising from, any statutory instruments, laws, regulations, European laws, directives, regulations, as well as the provisions or indications of any Authorities and Supervisory Bodies;
- b) aims strictly related to and instrumental to the management of the relationship with the Data Subjects (e.g. acquisition of preliminary information for the purposes of entering into an agreement, execution of transactions in accomplishment of contractual obligations, communication of Personal Data to insurance companies);

¹ For the purposes of the present information notice, “**Personal Data**” means each and any piece of information concerning an individual identified or identifiable (Art. 4, par. 2, GDPR).

² For the purposes of the present information notice, “**Data Processing**” means 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (Art. 4.1 GDPR).

- c) aims functional to the activities of the Group Companies for which the Data Subject has the faculty to express or not his / her consent, among which: activities of marketing, development of contacts for the acquisition of new relationships, ascertaining the level of satisfaction for the quality of the rendered services, improvement of the level of the services offered, promotion of products and services offered by the Group Companies (also by the sending – whether or not through the use of automated communication systems, e-mails, SMS and fax – of advertising material and newsletters as well as through telephone communications with a phone operator or through post; communication and promotion of initiatives and activities of the Group Companies, realization of conventions and events).

The Personal Data supplied will be processed in full compliance and respect of the principles of GDPR and of any Italian enactment provisions.

2. Modalities of Personal Data Processing and Communication.

The processing of Personal Data will take place through instruments adequate to guarantee the security and confidentiality of the Data and it will be possible to carry out the processing with the help of instruments whether manual, informatics/software based and telematic, capable of memorizing, storing, managing and transmitting the Personal Data involved.

The modalities for the treatment of Personal Data include the possibility to use informatics-operated systems and automatic instruments capable of connecting the Personal Data with the Personal Data of other Data Subjects, based on criteria of a qualitative, quantitative and temporal nature, recurring or to be defined time after time, as well as the use of techniques of recording limited to the negotiation of financial instruments.

For the aims indicated in point 1 above, the Personal Data may be processed by the Group Companies and communicated, in addition to the latter, also to:

- Any competent judicial or administrative authority;
- companies performing banking or financial services;
- subjects carrying out insurance and reinsurance activities and / or operating in areas related to the mentioned activities, for instance insurers, agents, sub-agents, insurance brokers, medical staff, insurance assessors, liquidators, industry associations;
- other Group Companies being autonomous Data Controllers³ (also in relation to the information provided by articles 39 and following of Italian Legislative Decree 231/07 as modified by Legislative Decree n. 90/17);
- the companies managing national or international systems for the monitoring of frauds to the detriment of banks and financial intermediaries;

³ For the purposes of the present information notice, “**Data Controller**” means 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 (art. 4.7 GDPR). “**Data Processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller (art. 4.8 GDPR).

- service providers for the execution, registration and Processing of Personal Data sourced from documents or supports supplied or originated by the very Data Subjects and having as object the mass processing relative to payments cheques and other types of certificates or securities;
- any inter-bank entities operating in the assessment of financial risks;
- companies operating in the debt recovery business;
- individuals or subjects who carry out, for any Group Companies, activities of printing, transmission, mailing and transportation or dispatch of communications, even periodically;
- companies in charge of reviewing, auditing and certification of financial statements of Companies of the Azimut Group;
- companies that, on behalf of the companies of the Azimut Group, supply specific services of elaboration or that carry out activities related, instrumental or supporting these companies, or activities necessary for the execution of operations or services required by the clients;
- subjects who perform services for the management of the informative systems of the companies and of the telecommunication networks;
- subjects who carry out for the Group Companies the promotion and / or the placement of products and / or services;
- subjects who carry out activities for the archiving and keeping of the documentation and data entry activities.

The subjects included in the above listed categories operate in full autonomy, as either distinct Data Controllers or as Data Processors, or third parties⁴ appointed for this purpose.

The updated list of the Data Processors is available, upon request, by sending a request to the contacts indicated later in this document.

Personal Data can be transferred abroad towards countries being members of the European Union in the context of the processing aims and within the subjects above indicated.

Transfers of Personal Data out of the European Union can be carried out where there is an adequacy assessment decision issued by the European Commission, or in the presence of other appropriate safeguards provided by GDPR (including binding corporate rules and standard data protection clauses).

⁴ For the purposes of the present information notice, “**Third Party**” means any natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data (GDPR 4.10 and article 29).

Without the consent of the Data Subject, the Group Companies will only be allowed to execute those operations and services that do not require the communication of Personal Data to third parties, except for what provided by article 6 of GDPR and by the Italian enactment laws and regulations.

Personal Data shall not be disseminated.

3. Nature of Personal Data Submission and Consequences in case of Refusal.

The conferring of Personal Data for the accomplishment of obligations arising from the laws, regulations and the contract is necessary by nature (aims specified in a) and b) of point 1 above). Therefore, the refusal by the Data Subject to submit such Personal Data will impede the conclusion or prosecution of the contractual relationship with the Data Subject, with reference to the insurance related management and payment in case of insured events.

The conferring of Personal Data required for the aims of marketing, to develop contacts for the acquisition of new contractual relationships or to elaborate studies and statistical and market researches is optional (aims of letter c) of point 1 above) and the refusal of the Data Subject to supply the same will only preclude the performance of the relative activities.

4. Duration of Personal Data Processing

Personal Data are kept for a period of time no longer than what is necessary for the accomplishment of the finalities for which the Data are processed, without prejudice to the keeping of documents justified by terms provided by the applicable laws and regulations.

The Personal Data supplied by the Data Subject processed for aims of marketing will be kept until a client revokes his / her consent to the pursuance of the above mentioned finalities.

Once the mentioned terms have elapsed, Personal Data will be erased and / or anonymised so as not to allow, even indirectly, to identify the Data Subjects.

5. Data Controllers.

The Companies of the Group that will process Personal Data in their role of Data Controllers, according to the aims and modalities specified in the present information are the following:

Azimut Capital Management SGR S.p.A.

Via Cusani n. 4,

20121 – Milano

e-mail: privacy@azimut.it

Azimut Financial Insurance S.p.A.

Via Cusani n. 4,
20121 – Milano
e-mail: privacy@azimut.it

AZ Life dac

1st Floor, Block 5
Irish Life Centre
Abbey Street Lower
Dublin 1, D01 P767, Ireland

AZ Life - Rappresentanza Generale per l'Italia

Via Cusani 4
20121 Milano
e-mail: privacy@azlife.ie

The contact details for the Data Protection Officer (“DPO”) provided by GDPR are available on the website www.azimut.it in the section “Privacy”.

6. Rights of the Data Subject

With reference to the processing of Personal Data, it is a right of the Data Subject to exercise the rights provided for by article from 15 to 22 of GDPR. In particular, the Data Subject has the right to obtain from the Data Controller the access, rectification, integration or erasing (“right to be forgotten”) of his / her Personal Data, the limitation of the Processing and the transferability of the Personal Data; the Data Subject also has the right to object to the Processing of his / her Personal Data and the right to submit a complaint to the authority competent for Personal Data Protection.

The Data Subject will also be allowed to exercise the above mentioned rights in any moment by sending a communication to the above indicated contacts.