

Privacy Policy

Privacy Policy for Processing of Personal Data of Users

DeA Capital S.p.A. (hereinafter "**DeA Capital**"), a company of the De Agostini Group acting in its capacity of data controller would like to inform the users (the "**Users**") of the website www.deacapital.com (the "**Site**") about the modalities in which it processes the personal data provided to DeA Capital, according to the Legislative Decree No. 196/2003 (the "**Privacy Code**") and to the new European Regulation No. 679/2016 on the protection of personal data (the "**Privacy Regulation**").

1. Data controller and data processor

DeA Capital with registered office in Via Brera 21, 20121 Milan (Italy) is the data controller, which can be contacted at the following email address: pcy.officer@deacapital.com. A complete list of the data processors can be requested through the abovementioned email address.

2. Personal data collected

DeA Capital will process, according to this privacy policy, data provided by the Users, including:

- a. personal data and contact details, in connection with the services provided through the Site;
- b. browsing data related to the use of services offered through the Site collected through cookies and according to the cookie policy available at <http://www.deacapital.com/EN/Legal%20Notes.aspx>; and
- c. data provided when requesting information or assistance

Health data or in general other special categories of personal data according to article 9 of the Privacy Regulation will not be processed. Personal data of minors will be processed according to the modalities explained in paragraph 8 below.

The abovementioned data will be processed only in so far as it is necessary to the pursuit of the purposes described in paragraph 4 of this privacy policy.

3. Processing of personal data

Personal data of the Users are processed using electronic and/or paper means and are protected with the implementation of adequate security measures to ensure safety and confidentiality of the personal data. Specifically, DeA Capital adopts appropriate technical and organizational measures to protect personal data against loss, theft, unauthorised use, disclosure, or alteration thereof.

When it is no longer necessary to process the personal data in an identifiable way for the purpose for which they were collected, or at the end of the retention period (further explained in paragraph 10), DeA Capital will anonymize personal data and will remove identifiers.

4. Purposes of the processing

DeA Capital asks its Users to provide their personal data for the following purposes:

- a. to allow the User to enjoy the services provided through the Site, the customer service and to enforce or defend a rights toward the User or others (jointly defined as: "**Contractual Purposes**");
- b. to comply with legal and regulatory obligations (defined as "**Legal Purposes**");
- c. with the prior consent from the User, to send newsletters via email relating to the DeA Capital and the funds that it manages and the Site as well as commercial information on DeA Capital and the funds that it manages (defined as "**Marketing Purposes of DeA Capital**").

5. **Legal basis for the processing**

Processing of personal data for Contractual Purposes is mandatory since it is necessary to enjoy the specific services offered through the Site.

Processing of personal data for Legal Purposes is mandatory since it is required by the applicable laws. If the User does not wish his personal data to be processed for these purposes, he will not be able to enjoy the services offered through the Site.

Processing of personal data for Marketing Purposes of DeA Capital, is not mandatory, and subject to prior consent of the User. If the User does not give his consent however, DeA Capital will not be able to inform the User about new product or services.

6. **Communication of personal data**

For the purposes explained in paragraph 4, DeA Capital might communicate Users' personal data, strictly necessary to each type of processing, to the following categories of subjects:

- a. employees, collaborators and suppliers of DeA Capital, within the performance of their tasks and/or contractual obligation, in relation to the commercial relations with the Users;
- b. subproviders and/or subcontractors within the context of the activities connected to the performance of services and the offer of products by DeA Capital; and
- c. other companies of the De Agostini group located in countries specified in the following paragraph 7.

Personal data of the Users will not be disseminated.

7. **Overseas transfer of personal data**

Personal data can be freely transferred outside the national territory, to other countries in the European Union.

8. **Data subjects under 18 years old**

The Site is not directed to minors. If the User is a minor, he will not be able to use the services offered through the Site.

9. Rights of the Users

Users will have at any time, and with no additional charge, the right to: (a) obtain confirmation as to the existence of personal data concerning him and, where that is the case, access to the personal data; (b) to know the origin of the data, the purposes of the processing, the ways in which the data are processed and the logic applied to the processing carried out through automated means; (c) to request the update, correction or - if he is interested - the integration of his data; (d) to request the erasure, the anonymization or the blocking of data unlawfully processed, and to object to the processing for legitimate reasons; (e) to object, fully or partially, to the processing of his personal data for direct marketing purposes carried out through automated and/or traditional means; (f) to withdraw his consent to the processing of his data at any time, without affecting the lawfulness of the processing based on the consent before its withdrawal

In addition to the abovementioned rights, Users will also enjoy the rights enshrined in the following paragraph 10 c).

Users will be able, at any time, to exercise their right, to modify the contact details, to notify DeA Capital updates regarding their data, to obtain the removal of the data communicated by third parties, or to obtain further information on the processing of their personal data carried out by DeA Capital, by writing an email to the following address: pcy.officer@deacapital.com.

10. Further provisions according to the Privacy Regulation

The following provisions are effective starting from May 25th 2018, when the Privacy Regulation starts to apply.

- a. Retention period of personal data: DeA Capital will process personal data for the time necessary to fulfil the specific purposes for which the data was collected according to paragraph 2 above. In any case, the following retention periods will apply to the processing of personal data for the following purposes:
 - data collected for Contractual Purposes according to paragraph 4 lett. a) will be retained for the duration of the contract and for 10 years after its termination to exercise/defend a right of DeA Capital, both in court and outside, where a claim should arise relation to the contract
 - data collected for Legal Purposes according to paragraph 4 lett. b) shall be retained in accordance with the specific limitation periods defined by law
 - data collected for Marketing Purposes of DeA Capital according to paragraph 4 lett. c) shall be retained for the duration of the registration of the User to the Site through his account, and/or the participation to the online courses and/or the enjoyment of a service offered through the Site; and then for 2 years after the termination, deactivation and/or the deletion of the above;

Once these terms have expired, personal data of the Users will be deleted/anonymized and/or aggregated.

- b. additional rights: the User, at any time and in the ways and manners explained in the previous paragraph 9 will have the right to: (a) ask for a restriction of the processing when: (i) the accuracy of the personal data is challenged, for a period necessary for the controller to verify the accuracy of the personal data; (ii) the processing is unlawful and the User objects the to the erasure of the personal data and requests the restriction of their use instead; (iii) DeA Capital no longer needs the personal data for the purposes of the processing, but they are required by the User for the establishment, exercise or defence of a legal claim; (iv) the User has objected to the processing pursuant to Article

21.1 of the Privacy Regulation, pending the verification on whether the legitimate reasons of the controller override those of the User; (b) object at any time to the processing of his personal data, except when DeA Capital has an overriding legitimate interest; (c) ask for the erasure of his personal data without undue delay; (d) obtain the portability of his personal data; (e) where there are the conditions, bring a claim before the national data protection authority

11. Updates

This privacy policy will be effective from the date indicated in its heading.

DeA Capital might change and/or integrate this document, also as a consequence of further modifications and/or integration of the Privacy Regulation. Updates and modifications will be notified in advance and Users will always be able to view the updated privacy policy at the following link <http://www.deacapital.com>

If the User has doubts, questions or complaints with regard to the collection and processing of his personal data, he may contact DeA Capital by writing an email to the address: pcy.officer@deacapital.com.

Cookies policy

Our website uses cookies. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

About cookies

A cookie is a small file, typically of letters and numbers, downloaded on to a device when the user accesses certain websites. Cookies allow a website to recognise a user's device and track users as they navigate different pages on a website and to identify users returning to a website.

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

For more information see: <http://www.allaboutcookies.org>

Blocking/Managing cookies

You may configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For example:

(1) in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector;

(2) in Firefox you can block all cookies by clicking "Tools", "Options", and un-checking "Accept cookies from sites" in the "Privacy" box.

Blocking all cookies will, however, negatively affect the usability of many websites. If you block cookies, you will not be able to use login/account and facet application featured on websites you may browse and it will affect some of features available on this website.

Deleting cookies

You can also delete cookies already stored on your computer: check the "Help" menu of your browser.

For example:

(1) in Internet Explorer, you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>;

(2) in Firefox, you can delete cookies by clicking "Tools", "Options" and "Privacy" and then choosing "Use Custom Settings for History" from the History drop down menu settings, the clicking "Clear cookies" when the menu "Show cookies" appears with the list.

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