

Subscription of shares of Funds managed by Fideuram Asset Management (Ireland) dac Information Notice with respect to natural persons pursuant to Articles 13 and 14 of Regulation (EC) 2016/679 of the European Parliament and Council dated 27 April 2016

The Regulation on the "protection of natural persons with regard to the processing of personal data and on the free movement of such data" as per Articles 13 and 14 of Regulation (EC) 2016/679 of the European Parliament and Council dated 27 April 2016 (the "Regulation"), contains a series of provisions aimed at ensuring that processing of personal data is carried out with due respect for the fundamental rights and freedoms of natural persons. This Information Notice transposes its provisions.

Fideuram Asset Management (Ireland) dac (the "Company") does not process personal data where the Company acts through local third parties which maintain the relationship with customers (for example, distributors or paying agents), which are acting in the capacity of independent data controllers. The references to such third parties are stated in the documentation signed at the time of subscribing the shares.

The Company will process your data if you are a direct customer, or in the event that the local third parties maintaining relations with customers send your personal data to the Company for the purposes indicated below in Section 3 of this Information Notice. It should be noted that, in such cases, the Company acts as independent data controller (hereinafter also the "Controller") of these processed personal data.

SECTION 1 – IDENTITY OF THE CONTROLLER OF THE PROCESSING AND CONTACT INFORMATION

Fideuram Asset Management (Ireland) dac, belonging to the banking group Intesa Sanpaolo (hereafter the "Group"), with registered office at 2nd Floor, International House, 3 Harbourmaster Pl, International Financial Services Centre, Dublin, D01 K8F1, Ireland, will process your personal data (the "Personal Data") as independent controller, for the purposes indicated in Section 3 of this Information Notice.

For additional information you may visit the website of Fideuram Asset Management (Ireland) dac (<http://www.fideuramireland.ie/en/policy/>) with all the information relating to the use and processing of Personal Data, the updated information regarding contacts and the communication channels made available by the Company to all data subjects.

SECTION 2 - CONTACT INFORMATION OF THE DATA PROTECTION OFFICER

The Company appointed a "Data Privacy Manager " ("DPM"). For any questions regarding the processing of your Personal Data and/or to exercising the rights provided by the Regulation listed in Section 7 of this Information Notice, you may contact the DPM at the following email address: DataPrivacyManager@fideuramireland.ie

SECTION 3 - CATEGORIES OF PERSONAL DATA, PURPOSES AND LEGAL BASIS FOR PROCESSING

Categories of Personal Data

The Personal Data that the Company processes include, but are not limited to, the data subject's personal records data, banking details (e.g., IBAN), the data related to family and personal situations, information regarding education level and employment as well as, for companies, the Personal Data of the legal representative/proxy. The data processed may also include data defined as special data pursuant to Section 8 of this Information Notice.

Purposes and legal basis of the processing

The Personal Data that concern you, disclosed to the Company or collected by third parties (in the latter case subject to verification of compliance with the conditions of law by the third parties) are processed by the Company in the context of its activities for the following purposes:

a) Providing services and the performance of contracts

The provision of your Personal Data needed to perform the services requested and to fulfil the contracts (including documents in the pre-contractual stages) is not mandatory, but the refusal to supply such Personal Data makes it impossible for the Company to perform the services requested.

b) Compliance with provisions of national and EU laws and regulations

The processing of your Personal Data for compliance with regulatory requirements is mandatory and your consent is not required.

The processing is mandatory, for example, when it is required by anti-money laundering, fiscal, anti-corruption, and fraud-prevention laws and regulations regarding payment services, or for complying with instructions or requests of the supervisory and control authorities (such as the monitoring of operating and credit risk at the bank group level).

c) Controller's legitimate interest

The processing of your Personal Data is necessary for the pursuit of a legitimate interest of the Company, namely:

- to carry out fraud-prevention activity;

- to pursue possible additional legitimate interests.

In this last case, the Company may process your Personal Data only after having informed you and having established that the pursuit of its legitimate interests or those of third parties will not compromise your rights and fundamental freedoms; and your consent is not required.

SECTION 4 - CATEGORIES OF RECIPIENTS TO WHOM YOUR PERSONAL DATA MAY BE DISCLOSED

For the pursuit of the purposes indicated above, and given the outsourcing of some of the mentioned processes, functions and activities to companies that belong to the Group or not, it may be necessary for the Company to communicate your Personal Data to the following categories of recipients:

1) Group companies or subsidiaries or affiliates;

2) Third parties (companies, professionals, etc.) operating both within and outside the European Union that process your Personal Data as part of:

- banking, financial and insurance intermediaries, including the parties involved at various levels in the processes of production, administration, distribution and control of products and/or services offered by the Company, for the purpose of implementing the provisions of the data subject/data subjects and to regulate the fees under contracts with the same;
- parties that provide the services for managing the Company's information system and telecommunications networks (including email);
- parties operating on behalf of the Company, in technical or organisational tasks;
- service companies for acquiring, registering and processing data taken from documents, or media supplied and created by the clients themselves;
- parties engaged in transmitting, transporting and handling communications with customers;
- parties engaged in activities of storing the documents related to relationships held with customers; parties engaged in customer care activities (for example, call centre, help desk, etc.);
- professionals or companies in the context of providing assistance and advice or other services provided to the Company;
- parties that carry out operations of control, auditing and certification of the activities performed by the Company, also in the customers' interests.
- parties that, with respect to the goods or services of the Company or other Group companies, are engaged in activities of establishing the degree of customer satisfaction, sales and promotion, preparing studies, research or market surveys, marketing activities and analysis.

3) Authorities (as for example, judicial authorities, administrative authorities), Supervisory Bodies and public information systems that are established at national or foreign government entities.

Intesa Sanpaolo Group companies and third parties to which your Personal Data may be communicated may act as: 1) Controllers of the processing, namely the parties who determine the purposes and means for processing the Personal Data; 2) Processors, namely the persons who process the Personal Data on behalf of the Controller or 3) Joint Controllers of the processing who, together with the Company, jointly determine the purposes and means of the processing.

The updated list of the parties identified as Controllers, Processors or Joint Controllers is available at the Company's registered office.

SECTION 5 - TRANSFER OF THE PERSONAL DATA TO A THIRD-PARTY COUNTRY OR AN INTERNATIONAL ORGANISATION OUTSIDE OF THE EUROPEAN UNION.

Your Personal Data is processed by the Company within the territory of the European Union and, if necessary, for technical or operational reasons, the Company 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 the Regulation.

The Company informs you that the Personal Data contained in the messaging regarding financial transfers can be provided, for the exclusive purposes of preventing and combating terrorism and its financing, to the public Authorities of the United States of America.¹

SECTION 6 - PROCESSING METHODS AND CONSERVATION PERIODS OF PERSONAL DATA

The processing of your Personal Data takes place through manual and electronic instruments, and in a manner to ensure the security and confidentiality of the data.

Your Personal Data shall be retained for a period of time no longer than is necessary for the purposes for which they are processed, subject to the retention periods prescribed by law. More specifically, your Personal Data are generally kept for a period of 10 years starting at the termination of the contractual relationship to which you are a party. The Personal Data may also be processed for a longer period, should there be an interruption and/or suspension of the statutory term that justifies prolonging the conservation of the data.

SECTION 7- RIGHTS OF THE DATA SUBJECT

As the Data Subject, you may at any time exercise your rights vis-a-vis the Controller as provided in the Regulation listed below, by sending a request in writing to the email address DataPrivacyManager@fideuramireland.ie; by mail, or directly at the registered office.

In the same way, you may at any time revoke the consent you expressed in this Information Notice.

Any communication and actions undertaken by the Company with respect to the exercise the rights listed below will be performed free of charge. However, if your requests are manifestly unfounded or excessive, especially by their repetitive nature, the Company may charge you a handling fee, taking into account the administrative costs incurred, or refuse to accommodate your requests.

1. Right of access

You may obtain from the Company a confirmation regarding whether or not your Personal Data are being processed and, if so, to obtain access to the Personal Data and information provided under Article 15 of the Regulation, including, without limitation, the purposes of the processing and the categories of Personal Data processed.

If your Personal Data are transferred to a third-party country or an international organisation, you have the right to be informed of the existence of adequate safeguards – under Article 46 of the Regulation in regard to the transfer.

If requested, the Company can provide you a copy of the Personal Data being processed. For any additional copies, the Company may charge you a reasonable fee based on administrative costs. If the request in question is submitted by electronic means, and unless indicated otherwise, the information will be provided to you by the Company in a commonly used electronic format. It remains understood that the right to obtain such a copy must not adversely affect the rights and freedoms of others.

2. Right to rectification

You may obtain from the Company the rectification of your Personal Data that are inaccurate, as well as, taking into account the purposes of the processing, the supplementing of the same, if they are incomplete, by providing a supplementary statement.

¹ More specifically, the European Union and the United States of America concluded an Agreement (Official Journal of the European Union 195/5 dated 27.7.2010) on the transfer of financial messaging data from the European Union to the United States, for the purposes of implementing the programme for the prevention and repression of terrorist activities. The Agreement provides that, in relation to certain financial transactions (e.g., foreign bank transfers), with the exception of those carried out in the Single European Payments Area (SEPA), the U.S. Treasury Department may make requests for data acquisition directly to the providers of international financial messaging services that the Company uses (currently the SWIFT company). Rigorous guarantees provided by the aforementioned agreement are applied to such processing, both in relation to the integrity and security of the data and the conservation time thereof. The Agreement also stipulates that the right of access will be exercised exclusively through the Authority for the protection of personal data in the Data Subject's own country.

3. Right to erasure

You may ask the Data Controller to erase your Personal Data, if one of the grounds exists under Article 17 of the Regulation, including, without limitation, where Personal Data are no longer required in relation to the purposes for which they were collected or otherwise processed, or where the consent underlying the processing of your Personal Data has been revoked by you and there is no other legal basis for the processing.

The Company informs you that it will not erase your Personal Data: if their processing is necessary, for example, to fulfil a legal requirement, for reasons of public interest, or for ascertaining, exercising or defending a legal claim.

4. Right to restriction of processing

You may restrict the processing of your Personal Data if you are availing yourself of one of the provisions under Article 18 of the Regulation, including, without limitation, where you contest the accuracy of your Personal Data being processed or where your Personal Data are necessary to establish, exercise or defend a legal claim, as long as the Company has no more need for the processing.

5. Right to data portability

If the processing of your Personal Data is based on consent or is necessary for performing a contract or pre-contractual measures and processing is done by automated means, you may:

- request receipt of the Personal Data you provided in a structured format, commonly used, that can be read by an automated device (example: computers and/or tablets);
- transmit the Personal Data received to another Controller without hindrance from the Company.

You may also request that your Personal Data be transmitted by the Company directly to another Controller indicated by you, if this is technically feasible for the Company. In this case, it will be your responsibility to provide all the exact details of the new controller to which you want to transfer your Personal Data, providing us with written authorisation.

6. Right to object

You may at any time object to the processing of your Personal Data if the processing is being performed for the execution of an activity in the public interest or in the pursuit of a legitimate interest of the Controller (including profiling activities).

If you decide to exercise your right to object as described herein, the Company will refrain from further processing your Personal Data, unless there are legitimate reasons to proceed with the processing (reasons overriding the Data Subject's/Data Subjects' interests, rights, and freedoms), or the processing is necessary for ascertaining, exercising or defending a right in court.

7. Automated decision-making process concerning natural persons, including profiling

If the Company makes decisions based solely on automated processing, we inform you that the Regulation provides the right to Data Subjects not to be subjected to a decision based solely on the automatic processing of your Personal Data, including profiling, which produces legal effects that concern you or significantly affect your person unless that decision:

- a. is necessary for concluding or performing a contract between you and the Company;
- b. is authorised by national or European law;
- c. is based on your explicit consent.

In cases of letters a) and c), the Company will implement appropriate measures to protect your rights, your freedom and legitimate interests, and you may exercise your right to obtain human intervention from the Company to express your opinion or to challenge the decision.

8. Right to submit a complaint to the Personal Data Protection Authority

Notwithstanding your right to appeal in any other administrative or judicial venue, if you consider that the processing of your Personal Data by the Controller is done in violation of the Regulation and/or applicable law, you may submit a complaint to the competent Personal Data Protection Authority.

SECTION 8 – PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

In connection with specific transactions arranged or products requested by the Data Subject, it may happen that the Company would come into possession of special categories of Personal Data that the law defines as "sensitive", in that they can infer religious, philosophical, political, or other opinions, or information about your health status. For processing sensitive data, the

law requires a specific expression of consent that, in such cases, is limited to what is necessary for performing the services requested by the Data Subject, which you will be requested for each time.