

PRIVACY POLICY

Dear User,

pursuant to the General Data Protection Regulation "GDPR" n. 679/2016 / EU (hereinafter also the "Regulation") InvestoPro SIM S.p.A. (for the website www.investopro.com) provides the following information regarding the company policy for the processing of personal data:

1. Data Controller. The Data Controller is InvestoPro SIM S.p.A. (Tax Code 11259520960_ and VAT number 11259520960), in the person of the pro tempore legal representative, with registered office in Milan, 20122, Porta Romana Street n.61; e-mail: privacy@investopro.com.

2. Data Sources. This Notice applies to Personal Data we collect from or about you, by the methods below (see Point 4), from the following sources:

- InvestoPro websites. Consumer-directed websites, managed by or for InvestoPro SIM S.p.A., including the sites we manage under our domains / URLs and the mini-sites we manage on social networks such as Facebook ("Websites").
- InvestoPro or MARKETWALL Group mobile sites / apps. Consumer-directed mobile sites or applications managed by or for InvestoPro SIM S.p.A. or MARKETWALL group, such as smartphone apps.
- E-mails, texts and other electronic messages. Electronic communications between you and the InvestoPro companies or the MARKETWALL Group.
- CRC of InvestoPro or the MARKETWALL Group. Calls to our Customer Relationship Centers ("CRC").
- Offline registration forms. Paper registration forms and similars that we collect in various ways, for example by post or e-mail, when you apply to fill a position with our company.
- Data obtained from other sources. Social networks (e.g. Facebook, Google) or market research (if the feedback is not collected anonymously).

3. Types of data collected. Depending on how you interact with the website www.investopro.com or with InvestoPro SIM S.p.A. or the MARKETWALL Group (online, offline, by phone, etc.), we collect different types of data about you, as described below.

- Personal data. These are the data you provide us to allow us to contact you, such as your name, postal address, e-mail address, social network registration data, or telephone number.
- Data to access the account. These are the data necessary to log into your account profile, for example the login ID/e-mail address, username, password in non-recoverable format and/or the security questions and answers.
- Demographics and interests. These are data that describe your demographic characteristics or your habits, such as date of birth, age or age group, gender, geographic origin (postcode/zip code), preferred investment products, hobbies and interests and information about family or lifestyle; or your photographs or information relating to your career, professional background and others related to your CV (for example, where you send us such data to apply as a collaborator or consultant);
- Computer/mobile device's technical data. Any information relating to the computer system or other technological devices that you use to access one of our websites or one of our apps, such as the Internet Protocol (IP) address used to connect your computer or device to the Internet, the type of operating system and browser type and version. If you access a website or an app of InvestoPro SIM

S.p.A. or of MARKETWALL Group companies with a mobile device, such as a smartphone, the information collected will include, where permitted, the specific ID of your device, the advertising ID, geolocation and other similar data of mobile devices.

- Information on the use of websites/communications. As you browse and interact with our websites or our newsletters, we use automatic data collection technologies to derive certain information about your behavior. This information includes the links you click on, the pages you visit, and for how long, and other similar information and statistics about your interactions, such as content response times, download errors and the time spent on certain pages.

These data are captured using automated technologies such as cookies (browser cookies, flash cookies) and web beacons, and are also collected with third-party tracking systems. You have the right to oppose the use of such technologies, for more information read Point 4.

- Market research & consumer feedback. These are the data that you spontaneously communicate to us about your experience in using our products and services.
- Consumer Generated Content. This is any content you create and share with us on social networks, or by uploading it to one of our websites or apps, including social networking apps such as Facebook. These are photos, videos, personal stories, or other similar media content. Where permitted, we collect and publish consumer-generated content in connection with various activities, including contests and other promotions, interactive sites, customer retention and social networking.
- Data present on social networks. This is information that you publicly share on a social network, or data that is part of your profile on a social network (such as Facebook) and that you have allowed third parties to share with us. These are, for example, the basic data of your account (e.g. name, e-mail address, address, gender, date of birth, your city, profile photo, user ID, list of friends, etc.) and any other information or activities that you have allowed the social network to share. We receive the data (even partial) of your profile published on a social network every time you download or interact with a web application of InvestoPro SIM S.p.A. or of companies of the MARKETWALL Group on a social network (such as Facebook), every time you use a feature of a social network that is integrated into a site of InvestoPro SIM S.p.A. or of companies of the MARKETWALL Group or every time you interact with us through a social network. To find out more about how your data on a social network is transmitted to InvestoPro SIM S.p.A. or to companies of the MARKETWALL Group, or to exercise the opt-out on the sharing of such data on social networks, you can visit the website of the relevant social network.
- Payments and financial data. These are all the data we need to fulfill an order, or that you use to make a purchase, such as your credit or debit card details (cardholder name, card number, expiry date, etc.) or others forms of payment (if available). In any case, we - or the consultants who handle payments on our behalf - will handle such payments and financial data in compliance with applicable laws and regulations and security standards.
- Calls to Customer Service Centers. Communications with a Customer Service Center will be recorded or listened to, in compliance with existing laws, for local operational needs (e.g. to verify quality or for training purposes). Payment card data is not recorded. When required by law, you will be informed of these recordings at the start of the call.

4. Purpose of the treatment. The data you provide through our site or our web and social channels will be processed for the following purposes: a) registration and provision of the services offered by the site for the provision of the services requested by the user while browsing the Website including collection, storage and processing of data for the purposes of establishing and subsequent operational and technical management, including purchases made online; b) marketing of the Data Controller: to forward you, subject to your consent - by letter, telephone, e-mail, text message, automated systems or other means of communication -

advertising material, newsletters, promotional and commercial communications relating to InvestoPro SIM S.p.A. products. or of companies of the MARKETWALL Group; c) profiling: subject to your specific consent, we will be able to use the data relating to your purchases for their analysis and therefore to evaluate your preferences, habits, interests, behaviors, products purchased for statistical purposes or in order to improve our commercial offer thanks to a better customer knowledge, as well as to send you personalized commercial communications; d) fulfillment of obligations deriving from provisions of law both in civil and fiscal matters, of community legislation, as well as of rules, codes or procedures approved by Authorities and other competent Institutions, or to follow up on requests by the competent administrative or judicial authority and, more generally, of public entities in compliance with legal formalities; e) to protect the legitimate interests of the Data Controller or for the need to ascertain, exercise or defend a right in court.

5. Provision of data and legal basis of the processing. The provision of data is not mandatory, but your refusal to provide them (in the case of data marked as mandatory*) will not allow the Data Controller to provide you with the requested service or allow you to purchase online. In fact, we are required to process the data necessary for registration and for the provision of services, so for the purposes referred to in point 4.a) for the provision of services and to perform the obligations arising from the contract. The processing of your data aimed at contacting you or sending you advertising or commercial material (purposes referred to in point 4.b) marketing), or that aimed at knowing consumption preferences and thus improving our offer (purposes referred to in point 4. c) profiling) will be carried out only with your consent. If you do not intend to give your consent to points 4.b) and 4.c) you can also consult our site and use the services it provides (such as, for example, visit the pages, make purchases, join promotions, etc.).

6. Processing methods. The processing of personal data will be carried out in compliance with current legislation and, in any case, in order to guarantee its security, confidentiality, as well as prevent its unauthorized disclosure or use, alteration or destruction. The data will be processed through paper, electronic and computer media, through the creation of specific databases and organization of archives both in an automated and non-automated form.

7. Retention period. The data will be stored for a period of time not exceeding the achievement of the purposes for which they were collected or subsequently processed in accordance with the provisions of the law. The data relating to purchases for marketing or profiling purposes will be kept for a maximum period of 24 (twenty-four) months from registration (or for any other period required by current legislation or provisions of the Guarantor), after which they will be destroyed or made anonymous.

However, in certain circumstances we may retain Personal Information for longer periods, for example if required to comply with legal, tax or accounting obligations. In certain circumstances we may also keep your personal information for longer periods in order to have accurate documentation of the relationships between us in the event of complaints or disputes.

8. Scope of data communication. The data will not be disclosed or communicated to other subjects other than the Data Controller, the Manager, or the Data Processors. However, for the pursuit of the purposes indicated in point 4, the Data Controller may communicate your personal data to third parties (e.g. affiliated companies, companies providing mailing services, marketing and market research companies ...) who will operate as external data processors pursuant to art. 28 of the Regulation.

9. Transfer of personal data outside the EU. As part of the contractual relationships between InvestoPro SIM S.p.A. or companies of the MARKETWALL Group, as well as among the associated companies themselves, for some of the purposes indicated in point 4, your personal data may be transferred outside the EU, including databases shared and managed by third companies, whether or not part of the InvestoPro control perimeter. The management of the database and the processing of such data are bound to the purposes for which they

were collected and are carried out in full compliance with the standards of confidentiality and security pursuant to the applicable personal data protection laws.

Whenever your personal data should be subject to international transfer outside the EU territory, the Data Controller will adopt all suitable and necessary contractual measures to guarantee an adequate the level of protection of your personal data in accordance with what is indicated in this Privacy Notice, including, among others, the Standard Contractual Clauses approved by the European Commission.

10. Exercise of rights. As an interested party, pursuant to art. from 15 to 22 GDPR, you are granted the following rights on the personal data collected and processed by the Data Controller: access to personal data concerning you, their correction or deletion, the integration of incomplete personal data, the limitation of the processing in the cases provided for by art. 18 GDPR as well as opposition to the processing in the hypothesis of legitimate interest of the Data Controller. Furthermore, for cases in which the processing is based on consent or on the contract and is carried out with automated tools, you have the right to exercise the right to data portability or to receive Personal Data in a structured format, commonly used and readable by automatic device, as well as, if technically feasible, to transmit them to another holder without impediments. Finally, you have the right to revoke the given consent at any time for marketing and/or profiling purposes towards the Data Controller, as well as to oppose the processing of data for marketing purposes, including profiling connected to direct marketing. The possibility remains for the interested party who prefers to be contacted for the aforementioned purpose exclusively through traditional methods, to express his opposition only to receiving communications through automated methods.

At any time, you can lodge a complaint with the Personal Data Protection Authority, as well as resort to other means of protection provided for by applicable law.

Your rights, including the request for cancellation of the account and personal data, can be exercised by writing to privacy@investopro.com and indicating the nature of the request in the subject.

Last update: January 2022