

CUSTOMER INFORMATION AS REQUIRED BY ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 CUSTOMERS BUYERS AT AUCTION

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I. Data Controller

The "Data Controller" of the processing is Kruso Kapital S.p.A., registered office Largo Augusto 1/A, angolo Via Verziere 13 - 20122 Milan. The data subject may contact the following addresses to exercise the rights under point V. below:

Kruso Kapital S.p.A.

Largo Augusto 1/A, angolo via Verziere 13 - 20122 Milan, Tel. +39 02 80280600

Fax. +39 02 72093979

e-mail: compliance&antiriciclaggio@krusokapital.com

The Data Controller has appointed a Data Protection Officer ("DPO"), whom you may contact to exercise your rights, as well as to receive any information relating to them and/or this document, by writing to privacy@krusokapital.com.

The Data Controller and the DPO shall handle your request, also through designated functions, and shall provide you, without undue delay and in any event within one month of receipt of the request, with the information on action taken in relation to your request.

We inform you that where the Data Controller has doubts concerning the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the data subject.

II. Purpose of processing

With this information notice, the Data Controller intends to provide you with some information on the processing of your personal data resulting from your participation in the public auctions called by the Company, in presence and/or by sending remote bids through the KrusoK Aste App (hereinafter, the "App").

All processing of personal data will be carried out in accordance with Regulation (EU) 2016/679. Processing of personal data means any operation or set of operations which is performed on personal data or sets of personal data, whether or not stored in a database, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

III. Type of data collected

a) Data provided by the user

To participate in face-to-face auctions and/or to register for the App, create an account and participate in remote bidding auctions, we ask you to provide us with certain data that we need to enable you to use our services and to fulfil legal obligations (e.g. anti-money laundering regulations). The personal data processed by the Company include, but are not limited to:

- personal details (e.g. name, surname, tax code, domicile and residence);
- contact details (e.g. mobile phone, e-mail);
- data and photographs relating to identity documents;
- information on the profession;
- income and asset information;
- the data acquired from the payment provisions;
- a facial photograph - biometric data (collected only when registering on the App).

b) Data we collect automatically via the App

When you access the App, we collect certain information directly from the device you are using, such as:

- technical data: e.g. IP address, device information, language.

The App may require you to access certain functionalities on your mobile device, such as push notifications to inform you on the requested services (for example but not limited to: confirmation of bid submission, whether or not an asset has been awarded at an auction, camera, etc.).

IV. Purposes

The personal data you provide will be processed by the Data Controller for the following purposes:

I. Purposes related to the provision of the services you have requested:

- Compliance with the obligations of laws, regulations, EU directives or instructions given by the competent authorities, supervisory and control bodies (such as the obligations under anti-money laundering legislation). The provision of personal data for the above purposes is obligatory and the consent of the data subject is not required for them to be processed. The legal basis for processing is compliance with a legal obligation to which the controller is subject (Article 6(1)(c) of the GDPR) and, therefore, the consent of the data subject is not required;
- Purposes closely related to the management of customer relations in the context of activities conducted according to the Company's Articles of Association, and by law (e.g. by acquiring pre-contractual information, executing transactions based on obligations deriving from a contract/service entered into with Customers). The provision of personal data for the above purposes is not mandatory, but refusal to provide them

may, depending on the relationship between the data and the requested service, mean that the Company is unable to provide the service. Processing of the above data does not require the consent of the data subject. The legal basis for the processing is the performance of an agreement or pre-contractual measures (Article 6(1)(b) GDPR).

2. Purposes related to the use of the App. By way of example:

- Functional purpose of remotely verifying the customer's identity so that you can be uniquely identified as a user of the online bid sending service (known as facial recognition). When activating the service of participating in public auctions by online bidding, in order to facilitate the management and verification of identification documents and to prevent fraud and identity theft, the Company will electronically compare the photo of your identification document with the photo of your face (taken independently by the customer), in which you must be clearly recognisable. For this comparison to take place, explicit consent is required when registering on the App. The legal basis for the processing described above is consent (Art. 6(1)(a) GDPR). Consent is always optional and can be withdrawn, but refusal to provide it or its withdrawal may make it impossible for the Company to provide the online bid sending service;
- allow the user to access the App by registering an account and provide the required services, allow the user to submit a bid for an item at auction, respond to requests for support received from users/interested parties. The legal basis for such processing is the performance of an agreement or pre-contractual measures (Article 6(1)(b) of the GDPR);

The provision of personal data necessary for these purposes is not compulsory, but refusal to provide such data will make it impossible for the Company to provide the service.

3. Marketing purposes

- Survey of customer satisfaction with the quality of the services provided and the activities carried out by the Company, through personal interviews, telephone calls, questionnaires, etc., also through third party companies;
- Carrying out direct and indirect marketing activities to promote the products and services of the Company and the companies of the Banca Sistema Group, including the organisation of events, either through the use of automated calling systems or calling systems without the intervention of an operator and electronic communications (e-mail, SMS, MMS, etc.), or through the use of paper mail and telephone calls through an operator;
- Promotion and sale of products and services of companies of third party companies, including the organisation of events, also through automated systems (SMS, MMS, fax and e-mail);
- Communication or transfer of data to third party companies for the purposes of commercial information, market surveys, direct offers of their products and services, either through the use of automated calling systems or calling systems without the intervention of an operator and electronic communications (e-mail, SMS, MMS, etc.), or through the use of paper mail and telephone calls through an operator.

The provision of the data necessary for these purposes is optional and the legal basis for the processing is the consent of the data subjects (Article 6(1)(a) of the GDPR). The absence of consent will have no impact whatsoever on the relations between the parties as the consent can only lead to an improvement in the service. The consent may be withdrawn at any time by notifying the Data Controller.

4. Purposes related to the legitimate interests of the Data Controller

- Detecting anomalies in services (e.g. abnormal opening of the App, a link or a section);
- Measuring the effectiveness of the services provided through the creation of aggregated information;
- Only for users who have already used our services, pursuant to Article 130, c. 4 of Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, to promote the sale of products and services (similar or complementary to those you have already used) via your e-mail address, without prejudice to your right to object and no longer receive this type of communication.

The provision of personal data necessary for these purposes is not mandatory, but refusal to provide such data may make it impossible for the Company to provide the service itself. The related processing does not require the consent of the data subjects. The legal basis for such processing is the legitimate interest of the Data Controller (Article 6, paragraph 1, letter f) of the GDPR).

V. Persons who may receive the data or who may become aware of them as data controllers or data processors

Your data may be made accessible, for the above purposes, to:

- employees and contractors of the Data Controller in their capacity as authorised persons and/or internal data processors and/or system administrators;
- third party companies or other entities (e.g. ICT companies, app developers, consultants, web platform providers, etc.) that carry out outsourced activities on behalf of the Data Controller; in their capacity as external data processors.

The Data Controller may also disclose your data for the above-mentioned purposes to:

- parties identified by law (e.g. for purposes linked to the administration and assessment of taxes, tax disputes and tax collection: the Revenue Agency; for purposes related to the administration of justice: the judicial authorities; for purposes related to the exercise of supervisory, control and other functions specifically indicated by law: the Bank of Italy);
- companies in the Banca Sistema banking group, and its subsidiaries and associates, also with regard to the anti-money laundering/anti-terrorism obligations pursuant to Articles 35 and 36 of Legislative Decree no. 231 of 21 November 2007, as amended (disclosure to intermediaries belonging to the Banca Sistema banking group, even if located in third countries, is permitted on condition that they apply equivalent measures);
- parties whose products and services are offered by the Company;
- parties providing services related to management of the Company's information system and IT programmes;
- parties carrying out processing and transmission of communications/goods to/from customers (e.g. enveloping, mail management, carriers for delivery/collection of goods, etc.);
- providers of document archiving services;
- providers of customer assistance services (e.g. by telephone);
- parties involved in the management of payment and online collection and cash flow management services;
- operators of national and international fraud control and prevention systems;
- parties working to investigate and fight international terrorism;
- consultants;
- providers of market research and market survey services or service quality surveys, or parties involved in the promotion of products offered by the Company or by third parties;

- parties carrying out searches - e.g. to verify adverse entries (legal charges, sale, etc.) against the customer on official registers, Companies Registers, or Court registers (to verify whether or not there are any insolvency proceedings in progress);
- parties who control, review and certify the operations carried out by the Company, also in the interests of customers;
- vendors of a company, a business unit, legal relations sold en bloc or individually (e.g. the assignment of receivables);
- entities resulting from the conversion, merger or demerger of the Company.

The parties in the above categories will process your data as Data Controllers or Data Processors (as defined by law) within the scope of the existing contractual relationship.

VI. Rights of the Data Subject

The exercise of the rights under Article 15 et seq. of the GDPR is not subject to any form of restriction and is free of charge unless it is manifestly unfounded or excessive within the meaning of Article 12(5) of the EU Regulation. The Data Controller shall be obliged to provide information on action taken by the data subject without undue delay and within one month of receipt of the request. Extensions are permitted under Article 12(3) of the EU Regulation.

In relation to the processing described in this information notice and in accordance with Articles 13(2) (b) and (d), 15, 16, 17, 18, 19, 20, and 21 of the EU Regulation, you may exercise the following rights as the data subject:

- right of access, i.e. to obtain from the Data Controller confirmation as to whether or not personal data relating to him or her are being processed and, if so, to obtain access to them;
- right of rectification, i.e. the right enabling the data subject to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain completion of incomplete personal data, also by providing a supplementary declaration;
- right to erasure ("right to be forgotten"), i.e. the right enabling the data subject to obtain from the Data Controller erasure of personal data concerning him or her without undue delay if one of the grounds laid down by law;
- right to withdraw the prior consent at any time, without affecting the lawfulness of processing based on the consent before its withdrawal;
- right to restriction of processing in cases where: 1) the accuracy of the personal data is contested by the data subject, for a period enabling the data controller to verify the accuracy of the personal data; 2) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; 3) the personal data are required by the data subject for the establishment, exercise or defence of legal claims; 4) the data subject has objected to processing pursuant to Article 21 of the GDPR pending the verification whether the legitimate grounds of the data controller override those of the data subject;
- right to data portability, namely that the data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided, where the processing is based on consent or a contract, and is carried out by automated means;
- right to object, the data subject shall have the right to object at any time, for reasons connected to his or her particular situation, to the processing of personal data concerning him or her when the processing is carried out for the pursuit of the legitimate interest of the Data Controller. The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the rights of the data subject or for the establishment, exercise or defence of legal claims;
- right to object to direct marketing, the data subject shall have, in particular, the right to object, at any time, to the processing of personal data concerning him or her carried out for direct marketing purposes. The Data Controller shall refrain from further processing of personal data for the related purpose;
- right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if you believe that your rights have not been respected. Contact details of the Italian Data Protection Authority (Garante per la protezione dei dati personali) can be found at www.garanteprivacy.it;
- right to obtain, in the case of an automated decision-making process, information on the logic involved in the processing in question, and to request human intervention by the Data Controller; and to be able to express his or her opinion or contest the processing.

Any rectification or erasure of personal data or restriction of processing carried out upon request from the data subject - unless it proves impossible or involves disproportionate effort - shall be notified by the Data Controller to each recipient to whom the personal data have been disclosed. The Data Controller may inform the data subject about those recipients if the data subject requests it.

To exercise the above rights and to communicate, please contact Kruso Kapital S.p.A., Largo Augusto 1/A, angolo via Verziere 13 (tel. +39 02 80280600, fax. +39 02 72093979, e-mail: compliance&antiriciclaggio@krusokapital.com) and the DPO: see point I.

VII. Processing methods and data storage times

The processing of your personal data will be carried out by means of the operations listed in Article 4(2) of the GDPR, namely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. Your Personal Data will be processed manually, digitally and electronically using methods strictly related to the above purposes and in a way that guarantees the confidentiality and security of the data. The personal data processed by Kruso Kapital S.p.A. will be stored for the time necessary to manage the existing relationship and in compliance with the legal obligations provided for by the regulations (indicatively for a period of 10 years, in order to comply with the legal provisions on the preservation of accounting records). The personal data may be processed for a longer period for judicial purposes, tax audits or for compliance with anti-money laundering legislation. Data collected for the purposes set out in Section 2.2.2 will be processed and stored until consent is withdrawn.

VIII. Transfer of personal data to Third Countries

We will normally process your data within the European Union, but for technical or operational reasons we may transfer data outside the European Union or the European Economic Area (known as third countries). Your personal data may be transferred outside the European Union or the European Economic Area (so-called Third Countries). The Company hereby ensures that the transfer will be carried out in accordance with the applicable legal provisions by executing, if necessary, agreements ensuring an adequate level of protection and/or by adopting the standard contractual clauses required by the European Commission. For further information, please contact the DPO at privacy@krusokapital.com.