

**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.

The data subject may contact the following addresses to exercise the rights under point V. below:

Kruso Kapital S.p.A.

Via Cappuccio 14, 20123 – Milan, Tel. +39 02 81127800

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

The purpose of this notice is to provide you with information regarding the processing of personal data arising from your participation in public auctions organised:

- by the Company, either in person and/or by submitting bids remotely via the KrusoK Aste App (hereinafter; the "App");
- by subsidiaries of Kruso Kapital, by submitting bids remotely via the App.

All processing of personal data will be carried out in accordance with European Regulation 679/16. The processing of personal data means any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data or sets of personal data, even if not recorded in a database, such as collection, recording, organisation, structuring, storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, alignment or combination, 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 ask you to grant access to certain features on your mobile device, such as: push notifications to alert you about the services you have requested, and the camera.

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 and EU legislation, or with instructions issued by authorities legitimately empowered to do so by law and by supervisory and regulatory bodies; in particular, personal data may be processed to comply with Legislative Decree 231/2007 (Anti-Money Laundering Regulations), Legislative Decree 385/1993 (Consolidated Banking Act), as well as the obligations imposed by the Civil Code. The provision of personal data necessary for these purposes is mandatory, as failure to provide such data will prevent the Company from carrying out the activity you have requested; therefore, the processing of such data does not require the consent of the data subjects. The legal basis for the processing is compliance with a legal obligation to which the data controller is subject (Article 6(1)(c) of the GDPR) and,

therefore, the data subject's consent is not required. For these purposes, personal data is retained for 10 years from the end of the relationship;

- Purposes strictly connected with and instrumental to the management of customer relations within the scope of the activities carried out by this Company in accordance with its Articles of Association and the law (for example, the collection of information prior to the conclusion of a contract or service, and the performance of operations based on the obligations arising from the contract or service concluded with the customer). The provision of personal data necessary for these purposes is not compulsory, but refusal to provide such data may result – depending on the relationship between the data and the service requested – in the Company being unable to provide the service in question. The processing in question does not require the consent of the data subjects. The legal basis for the processing is the performance of a contract or pre-contractual measures (Article 6(1)(b) of the GDPR). For these purposes, personal data are retained for 10 years from the end of the relationship.

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. Consent is always optional and may be withdrawn at any time, but refusal to give consent or its withdrawal will mean that the Company is unable to provide the service relating to the sending of online offers. For these purposes, personal data is retained for 10 years;
- 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). For these purposes, personal data is retained until the user deletes their account and, in any event, for up to 10 years following such deletion.

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

- a. 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;
- b. Carrying out direct and indirect marketing activities to promote the products and services of the Company, 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;
- c. 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);
- d. 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. For these purposes, personal data is retained until the data subject withdraws their consent.

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). For these purposes, with the exception of the first two points, for which data is processed in aggregate form, personal data is retained until the data subject exercises their right to object, if applicable.

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);
- parent companies, subsidiaries or associated companies, 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, 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., Via Cappuccio 14, 20123 – Milano (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. Personal data processed by Kruso Kapital S.p.A. is retained for the periods specified in paragraph IV above: Purposes. Personal data may, however, be processed for a longer period where required for legal proceedings, tax audits or to comply with anti-money laundering legislation.

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.