

**PRIVACY NOTICE IN COMPLIANCE WITH ARTICLES 13 AND 14 OF REGULATION (EU)
2016/679****Effective from 07/10/2024**

Generali Real Estate Società di gestione del risparmio S.p.A. (hereinafter "GRE SGR") and Generali Real Estate S.p.A. (hereinafter "GRE SPA"), jointly referred to as "the Companies," "GRE," or "We", as data controllers protect the confidentiality and security of the personal data of the data subjects who access the website www.generalirealestate.com ("Website").

Users (hereinafter "You") of the Website are therefore informed that, while browsing the Web Site, GRE will primarily collect the information necessary to enable you to navigate, as well as to contact our offices, minimizing the processing of personal data referable to you, such that your Web Site browsing experience will remain nearly anonymous.

Unless otherwise specified, this privacy notice does not apply: (i) to other personal data processing activities carried out by GRE through means other than the Website (e.g. information collected offline), (ii) to processing activities carried out by other Generali Group companies on websites that you may access via links on the Website. For information on how other Generali Group companies process your personal data through their websites, please refer to the respective privacy notices available there.

We may modify this privacy notice from time to time, also following the introduction of new regulations and/or sector provisions. The updated version of this privacy notice will always be available on this Website for consultation.

1. Which company will process the information relating to you?

The Companies may process information relating to you. If you wish to contact the Companies or exercise a right associated with the processing of such information, you may use the following contact details:

| | e-mail | Regular mail |
|---------------------------------|--|---|
| Generali Real Estate S.p.A. | privacy.gre@generali.com | Generali Real Estate S.p.A., Via Machiavelli 4, 34132 Trieste |
| Generali Real Estate S.p.A. SGR | privacy.gresgr@generali.com | Generali Real Estate S.p.A. SGR, Via Machiavelli 4, 34132 Trieste |

If you wish to send questions about the processing of the information relating to you to our Data Protection Officer (DPO) or exercise a right, you can use the following contact details:

| | e-mail | Regular mail |
|-----------------------------|--|---|
| Generali Real Estate S.p.A. | dpo.gre@generali.com | Generali Real Estate S.p.A., Via Machiavelli 4, 34132 Trieste, all'attenzione del Data Protection Officer |

| | | |
|---------------------------------|--|---|
| Generali Real Estate S.p.A. SGR | dpo.gresqr@generali.com | Generali Real Estate S.p.A. SGR, Via Machiavelli 4, 34132 Trieste, all'attenzione del Data Protection Officer |
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2. For what purposes do we process the information relating to you and on what legal

GRE will process some information relating to you solely in pursuit of the purpose and by virtue of the legal basis set forth below:

| Purpose | Legal Basis | Data Provision |
|---|--|--|
| Ensuring browsing of the Web Site, including the ability to contact our offices, using the contact information available on the Website | Execution of a contract to which the data subject is a party | Mandatory [otherwise we would not be able to allow you to browse the Website or provide feedback to your requests] |

If the Companies wish to process the information for purposes other than those indicated above, before starting the processing of such data, they will provide you with the necessary information, including the appropriate legal basis.

GRE does not process personal data based on automated decision-making processes.

3. Categories of personal data processed

GRE will process the information relating to you only to the extent necessary to achieve the purposes mentioned above. It is understood that, in addition to what is specified above, we may process further categories of personal data relating to you as better specified below:

a. Data voluntarily provided when submitting any requests for information or assistance or using our contact details available on the Website. This data may include your name, surname, address, occupation, job title, employer/company associated, phone number, and email, as well as any other information you may provide when requesting information or assistance (hereinafter collectively referred to as "Identification Data");

b. Browsing data relating to your use of the services offered on the Website, such as IP addresses or the domain of your devices, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, and other parameters relating to your operating system and computer environment (hereinafter collectively referred to as "Browsing Data"). This data may be collected through cookies installed on the Website in compliance with our Cookie Policy available at the following link. The collection of Browsing Data is not aimed at identifying you and the processing of such information is carried out in aggregate form.

4. With whom do we share the information relating to you?

If the Companies process data relating to you, such processing will concern data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed, using electronic and telematic tools as well as paper forms, in order to ensure the security, protection, and confidentiality of your personal data.

In such an event, we may communicate your personal data to the following categories of recipients:

- a) Suppliers, third parties, and Generali Group companies to the extent that such companies provide assistance or consulting services to GRE, including but not limited to technological, accounting, administrative and legal services;
- b) Government authorities and supervisory bodies that are recognized the right to access your personal data under applicable laws; and
- c) Entities in various capacities involved in extraordinary operations such as mergers and demergers, as well as other companies resulting from mergers or other operations involving GRE.

Personal data that might be collected will not be disseminated.

5. Where do we transfer the information relating to you?

Personal data relating to you and possibly processed may be transferred abroad both within and outside the European Economic Area (EEA). In particular, the Company's activities may be supported by a network of computers, servers based on cloud infrastructure, and other IT infrastructures and technologies provided also by third parties.

If for technical and operational reasons our suppliers are located in countries outside the European Economic Area that may not guarantee a level of personal data protection equivalent to that provided within the European Economic Area, we will ensure that the level of personal data protection is adequately guaranteed by other measures such as binding corporate rules, standard data protection clauses adopted by the European Commission, or based on specific exemptions provided for by the GDPR. Further information on the countries to which personal data would be transferred and on the security measures adopted can be requested by writing to the above-mentioned contact details.

6. The rights you can exercise in relation to the processing of personal data relating to you

You can exercise the following rights by contacting us at the contact details indicated in Section 1:

Right of access You can ask GRE to access your personal data to know, for example, what personal data referring to you GRE is currently processing.

Right to rectification You can ask GRE to correct any personal data relating to you that may be inaccurate or incomplete.

Right to erasure You can ask GRE to delete the personal data relating to you in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- The personal data has been processed unlawfully by GRE; and
- The personal data must be erased to comply with a legal obligation under the law of the Union or the Member State to which GRE is subject.

Right to restriction of processing You can ask GRE to limit the way it processes personal data relating to you – and request solely their storage – in one of the following cases:

- Contesting the accuracy of your personal data for a period that allows GRE to verify the accuracy of your personal data;
- The processing is unlawful, and you oppose the erasure of your personal data, requesting instead the restriction of their use;
- GRE no longer needs your personal data for the purposes of processing, but these data are necessary for the establishment, exercise, or defense of legal claims;
- You have objected to the processing of your personal data pending verification of the existence of a legitimate interest of GRE that overrides your rights.

Right to data portability and consent withdrawal

You can ask GRE to transfer your personal data to another company or organization and/or receive your personal data in a structured, commonly used, and machine-readable format.

If your personal data has been subject to transfer outside the European Economic Area, you also have the right to obtain a copy of such data or the indication of where it has been made available.

The above-listed rights can be exercised by contacting GRE or our Data Protection Officer using the contact details provided above (see Section 1). You will not be charged for activities resulting from your request unless the request is manifestly unfounded or excessive, in which case we may charge you the related costs.

When you exercise your rights, we may request personal information to verify your identity.

7. The right to object to the processing of your personal data

You have the right to object to the processing of personal data relating to you possibly processed and to request the termination of processing operations based on the legitimate interest of GRE by contacting GRE and/or our Data Protection Officer using the contact details provided above (see Section 1).

8. The right to file a complaint with the competent Supervisory Authority

If you believe there are irregularities in the processing of personal data relating to you, you have the right to file a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), according to the methods described on the following website:

<https://www.garanteprivacy.it/home/diritti/come-agire-per-tutelare-i-tuoi-dati-personali>.

You also have the right to file a complaint with the Supervisory Authority of the European Union Member State in which you reside, work, or in which you believe the violation occurred. The contact details of the Supervisory Authorities of the European Union Member States can be found at the following link: https://edpb.europa.eu/about-edpb/board/members_en.

9. How long do we keep the data relating to you?

The data relating to you that may be processed will be kept only for the time necessary to pursue the specific purposes for which they were collected, as indicated in this Privacy Notice. Specifically:

- a. Your browsing data will be retained for no more than fourteen months and will be immediately deleted after being aggregated, except in cases where government authorities and/or supervisory bodies need to access such data to perform their functions;
- b. Your user preferences that allow you to navigate the Website based on selected criteria (e.g., language or country of origin) or to improve the services provided on the Website will be retained for no more than 2 years or until they are deleted by you;
- c. The personal data relating to you and possibly processed during the browsing experience on the Website will be retained for no more than fourteen months, unless their retention for a longer period is required by applicable laws or to establish, exercise, or defend legal claims.