**PRIVACY POLICY ON PERSONAL DATA PROCESSING FOR USE OF THE "****ASSET MANAGER WEB PLATFORM"**

Before you provide us with your personal data, in accordance with the provisions laid down by the European Data Protection Regulation 2016/679 ("**GDPR**''), you are required to read a series of information that will enable you to understand why your personal data will be processed, what your rights are and how you can exercise them.

**1. PURPOSE, LEGAL BASIS AND NATURE OF THE PROVISION, STORAGE PERIODS**

The **personal data and contact details** (**''Data''**) you provided are processed as specified in the table below:

|  |  |  |  |
| --- | --- | --- | --- |
|  | ***Purpose of processing and nature of data provision*** | ***Legal basis*** | ***Storage periods*** |
| 1 | **Purpose of account creation and use:**  the processing refers to the creation of an account in order to allow you to register on and access the ASSET MANAGER WEB PLATFORM IT platform (hereinafter also referred to as the ''***Platform***'').  This purpose also includes, for example, the option, in case you decide to register, to identify you and assist you in case you lose your access data (username or password), to set up your data protection choices, etc.  The provision of the Data is mandatory. Refusal to do so will inhibit access to the Platform. | - Taking steps at the request of the data subject prior to entering into a contract (Art. 6.1b GDPR) | For as long as your account is used, unless you request cancellation thereof. |
| 2 | **Where applicable, to establish, exercise or defend legal claims of the Joint Controllers in court proceedings and/or in an out-of-court procedure.**  The provision of the Data is required. You may object by writing to the e-mail addresses provided by the Joint Controllers. | * Legitimate interest (Art. 6.1f GDPR). | For the entire duration of the court proceedings and/or out-of-court procedure, until expiry of the time limits for the legal remedies and appeals |

**2. Data processing methods**

Processing is carried out with the aid of electronic or, in any case, automated means and transmitted via online networks.

The Data Controller shall take appropriate technical and organisational measures to ensure a level of security suited to the type of data being processed.

**3. Data Controller**

Your Data Controller is Prometeia Advisor Sim S.p.A. - Piazza Trento e Trieste, 3 - 40137 Bologna - Tel.+39 051 6480911 - E-mail: info@prometeiaadvisor.com.

**4.** **Data Protection Officer (DPO)**

The Data Protection Officer (DPO) can be contacted at the following e-mail address: privacy@prometeiaadvisor.com.

**5. Disclosure and dissemination of personal data**

Your Data may be disclosed to third parties (e.g. suppliers), in their capacity as Data Processors appointed by the Data Controller, including, for example, Dedagroup Wiz SRL.

Your data may also be disclosed to third parties acting as independent Data Controllers who are entitled to access them by virtue of provisions of law, regulations or EU legislation (e.g. public authorities).

Your personal data will not be disseminated.

**6. Place of processing and transfer of data to non-EU countries**

Your personal data is managed and stored on servers located within the European Union of the Data Controller and/or of third party companies appointed by the latter and duly appointed as Data Processors. The Data will not be transferred outside the European Union or the European Economic Area ("EEA").

**7. Rights of the data subject**

You may exercise your rights under Articles 15 to 22 of the GDPR, where applicable, with particular reference to the right of access to personal data, rectification, erasure, restriction of processing in the cases provided for by Article 18 GDPR, data portability, as well as the right to object to the processing in cases of legitimate interest of the Data Controller for reasons related to your specific situation.

Your requests to exercise your rights should be sent to the e-mail address privacy@prometeiaadvisor.com.

You also have the right to lodge a complaint with the competent Supervisory Authority.

**8. Amendments**

This Privacy Policy, published on the website at <https://am.advisor.prometeia.net> was updated on June 2023 and may be subject to amendments or further updates. Users are therefore invited to refer to the website periodically in order to keep abreast of the latest applicable Privacy Policy. The Data Subject may always request that the Data Controller deletes his/her personal data.