Cookies POLICY

What is a Cookie?

Cookies are small text strings used to perform computer authentication, session monitoring and storage of specific information about users accessing the server and are usually present in each user's browser.

Some operations would not be possible without the use of cookies, which in some cases are technically necessary.

The law states that "technical" cookies can be used even in absence of consent; these include:

- Cookies implanted in the user/contractor terminal directly by the owner of the single website, if they are not used for other purposes: this is the case of session cookies, authentication cookies, customization cookies (for example, for the choice of the navigation language), etc.
- Cookies used to statistically analyze accesses/visits to the site (so-called "analytics" cookies) which pursue exclusively statistical purposes and collect information in aggregate form.

Differently “profiling cookies”, aimed to create user profiles, are used to send advertising messages in line with the preferences expressed by the user during the web navigation. Due to the particular invasiveness that such cookies may have in the private sphere of users, the European and Italian legislation require that the user must be adequately informed to express a valid consent about their use.

A further element to consider concerns third parties cookies. This type of cookies integrates features developed by third parties within the pages of the site such as icons and preferences expressed in social networks in order to share site content or to use third parties software services (such as software to generate maps and additional software that offer additional services). These cookies are sent from third parties domains and from partner sites that offer their functionality between the pages of the site.

Cookies on this Web Site

Azimut Investments S.A. (hereinafter, also, “Data Controller”) does not use profiling cookies but only technical ones for the purpose of the proper functioning of the pages of this site, i.e. for:

✔ Identify user’s device when log in to his sites. In this way it is possible to provide information on products, allow the display of personalized content and make available other functions and services.
✔ Analyze the navigation in order to make it easier to access the services.
✔ Conduct aggregate research and analysis to improve the content, products and services.
✔ Improve security.

Azimut Investments S.A. uses cookies to improve the user’s navigation experience. Those technologies do not allow in any case the storage of data, access credentials or others information on the device, keeping untouched the web sites security level.

The features of the cookies used on the Site are illustrated in the table below.

<table>
<thead>
<tr>
<th>NAME</th>
<th>Purpose</th>
<th>First part/ Third part</th>
<th>Duration (days)</th>
<th>Others information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Liferay Cookie support (COOKIE_SUPPORT)</td>
<td>Technical</td>
<td>First part</td>
<td>365 days</td>
<td>Technical cookie for improving website navigation. No personal data stored</td>
</tr>
</tbody>
</table>
How to disable cookies

The use of "technical" cookies by Azimut Investments S.A. can be avoided through the settings of their browser. Although the "Help" function of most browsers indicates how to configure it so that it signals when a new cookie is received on the device, refuse new cookies, or disables them altogether, to facilitate users, the links to the instructions on how to disable cookies through the configuration of different browsers are shown below.

**Internet Explorer:**

**Google Chrome:**
[https://support.google.com/chrome/answer/95647?hl=it](https://support.google.com/chrome/answer/95647?hl=it)

**Mozilla Firefox:**
[https://support.mozilla.org/it/kb/Gestione%20dei%20cookie](https://support.mozilla.org/it/kb/Gestione%20dei%20cookie)

**Opera:**

**Safari:**

After this operation, however, some functions of the web pages may not be performed correctly.

**Methods of processing and disclosure**

The employees and collaborators of Azimut Investments S.A. may process the personal data collected using cookies in their quality of authorized persons, pursuant to article 29 of the European Regulation 2016/679.

In addition, the processing may be carried out by companies trusted by Azimut Investments S.A. as data processors, pursuant to article 28 of the European Regulation 2016/679.

An updated list of third parties who are identified as "Processors" is available, by request, sending a communication to the address below or an email to: privacy@azimutinvestments.com

Personal data will not be disclosed in any way.

**Rights of the Data Subject**

Each data subject has:

a) a right to request the Data Controller access to his/her personal information processed by or on behalf of the Data Controller;

<table>
<thead>
<tr>
<th>cookie name</th>
<th>type</th>
<th>domain</th>
<th>time to live</th>
<th>description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Liferay Language (GUEST_LANGUAGE_ID)</td>
<td>Technical</td>
<td>First part</td>
<td>365 days</td>
<td>Technical cookie, it shows the selected language</td>
</tr>
<tr>
<td>JSESSIONID</td>
<td>Technical</td>
<td>First part</td>
<td>Session</td>
<td>Session</td>
</tr>
<tr>
<td>LFR_SESSION_STATE</td>
<td>Technical</td>
<td>First part</td>
<td>Session</td>
<td>Liferay, it allows to keep authentication in the session</td>
</tr>
<tr>
<td>INVESTOR_TYPE</td>
<td>Technical</td>
<td>First part</td>
<td>365 days</td>
<td>Investor type selection</td>
</tr>
<tr>
<td>INVESTOR_COUNTRY</td>
<td>Technical</td>
<td>First part</td>
<td>365 days</td>
<td>Investor country selection</td>
</tr>
<tr>
<td>LEGAL_ACCEPTED</td>
<td>Technical</td>
<td>First part</td>
<td>365 days</td>
<td>Legal notice acceptance</td>
</tr>
<tr>
<td>COOKIE_PRIVACY_ACCEPTED</td>
<td>Necessary</td>
<td>First part</td>
<td>365 days</td>
<td>Stores the user’s cookie consent state for the current domain</td>
</tr>
<tr>
<td>PREFERRED_FUNDS</td>
<td>Technical</td>
<td>First part</td>
<td>3650 days</td>
<td>It allows to store a collection of funds into personal watchlist. No personal data stored</td>
</tr>
<tr>
<td>_ga</td>
<td>Statistic</td>
<td>Third part</td>
<td>2 years</td>
<td>Registers a unique ID that is used to generate statistical data on how the visitor uses the website.</td>
</tr>
<tr>
<td>_gat</td>
<td>Statistic</td>
<td>Third part</td>
<td>1 year</td>
<td>Used by Google Analytics to throttle request rate</td>
</tr>
<tr>
<td>_gid</td>
<td>Statistic</td>
<td>Third part</td>
<td>366 days</td>
<td>Registers a unique ID that is used to generate statistical data on how the visitor uses the website.</td>
</tr>
</tbody>
</table>
b) a right to have the Data Controller rectify his/her Personal Data if they are incorrect or incomplete;
c) a right to request the erasure of his/her Personal Data in accordance with the provisions of article 17 of the GDPR including in the following situations (i) where the Personal Data is no longer necessary in relation to the investor’s subscription, (ii) the Data Subject objects to the processing of its data and there are no overriding legitimate grounds for the processing, and (iii) the data has been unlawfully processed;
d) a right to request a restriction of the processing of his/her data in accordance with the provisions of article 18 of GDPR;
e) a right to object to the processing of his/her data;
f) a right to lodge a complaint with the Commission Nationale pour la Protection des Données ("CNPD") in Luxembourg and the relevant authority of the Member State in which the Data Subject resides or works in accordance with the provisions of article 77 of the GDPR;
g) a right to receive the Personal Data concerning him or her or to request that it be transmitted to another data controller, when feasible, in accordance with the provisions of article 20 of GDPR.

At any time, you will be able to exercise your rights by sending an email to privacy@azimutinvestments.com

Data Controller and Data Protection Officer

The company that will carry out, as the data controller (hereafter the “Data Controller”), the processing of Personal Data according to the purposes and methods indicated in this notice is Azimut Investments S.A., 35 Avenue Monterey, 2163 Luxembourg.

Data Subjects who wish to contact the Data Controller can reach out directly at:

Email: privacy@azimutinvestments.com

Mailing Address:
Azimut Investments S.A.
35, Avenue Monterey
L-2163 Luxembourg

The Data Controller has appointed a Data Protection Officer (DPO) that may be contacted by sending an e-mail to privacy@azimutinvestments.com