

**Privacy notice pursuant to Articles 13 and 14 of the Regulation (EU) 2016/679 (GDPR)**

*First layer*

We hereby provide you with the most important information on our current practices applicable to the processing of your personal data (the “**Personal Data**”) collected by Kervis SGR S.p.A. (“**Kervis SGR**”, “**we**”, or “**us**”) through the web platform Stairway dedicated to the advertising of office properties located in Piazza Trento Scalo Porta Romana for office use for lease and accessible through the website www.stairwaymilano.com (the “**Web Platform**”), as further detailed in the “*Second Layer – Detailed information on the processing document*” (the “**Privacy Notice**”).

<b>Controller</b>		
Kervis SGR S.p.A. with registered office in Milan, via Privata Fratelli Gabba, 1/A – 20121, Italy		
<b>Categories of Personal Data</b>	<b>Purpose of the processing / How we use your Personal Data</b>	<b>Legal Basis</b>
Navigation Data	We will process navigation data to collect statistical information on the use of the Web Platform (e.g., most visited pages, visitors per time/date, geographic areas of origin), and to monitor the functioning of our Web Platform	Legitimate interest of Kervis SGR
"Contact us for more information" section: name, surname, email address, phone number, municipality of residence, and additional information you will share in your message.	We will process the Personal Data provided in the "Contact us for more information" section to provide the requested information and answer related questions	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract
	We will process data collected through the Web Platform for marketing purposes, particularly to send you information and commercial communications related to the real estate market and projects	Consent
	We will use personal data collected through the Web Platform for profiling purposes, particularly to send you targeted communications tailored to your interests	Consent
<b>Your rights</b>		

At any time, you can revoke the consent given.

You have the right to obtain from us confirmation as to whether or not your Personal Data are being processed by us, and, where that is the case, you have the right to request us access to and rectification or erasure of the same or restriction of processing, and to object to processing, as well as the right to data portability, at any time

You have the right to lodge a complaint with the competent supervisory authority

#### **Source of the Personal Data**

Personal Data are collected directly from the data subject

## **Privacy notice pursuant to Articles 13 and 14 of the Regulation (EU) 2016/679 (GDPR)**

### *Second Layer – Detailed information on the processing*

We hereby provide you with the most important information on our current practices applicable to the processing of your personal data (the “**Personal Data**”) collected by Kervis SGR S.p.A. (“**Kervis SGR**”, “**we**”, or “**us**”) through the web platform Stairway dedicated to the advertising of office properties located in Piazza Trento Scalo Porta Romana for office use for lease and accessible through the website [www.stairwaymilano.com](http://www.stairwaymilano.com) (the “**Web Platform**”).

#### **1. Controller and contact details**

Kervis SGR S.p.A. with a sole shareholder  
Via Privata Fratelli Gabba no. 1/A  
20121, Milan, Italy  
Fiscal code and VAT: 10562400969  
Registered in the Register of Asset Management Companies no. 172  
E-mail: [privacy@kervissgr.com](mailto:privacy@kervissgr.com)

#### **2. Source of the Personal Data**

Personal Data are collected directly from the data subject.

#### **3. Categories of Personal Data**

The term Personal Data refers to the data you provide to Kervis SGR by filling in the data collection form on the Web Platform.

Such Personal Data include:

- (i) user data collected through the Web Platform ame, surname, email address, phone number, municipality of residence, or those freely transmitted by users when contacting the Data Controller through the functionalities available on the Web Platform.

#### **4. Purposes of the processing and legal basis**

Your Personal Data will be collected and processed for the following purpose:

- A. per raccogliere informazioni statistiche aggregate sull’utilizzo della Piattaforma Web (es., pagine più visitate, visitatori per tempo/data, aree geografiche di origine) e per monitorare il funzionamento della nostra Piattaforma Web. La base giuridica per il trattamento è il legittimo interesse di Kervis SGR di analizzare e migliorare le prestazioni della propria Piattaforma Web e di prevenire crimini e frodi informatiche;
- B. per fornire le informazioni richieste e le domande di cui alla sezione “Contattaci per maggiori informazioni”. La base giuridica per il trattamento è il vostro consenso.

In case you provide the consent, your Personal Data will also be processed for the following purpose:

- C. For marketing purposes, specifically to send you information and commercial communications related to the market and real estate projects. The legal basis for processing is your consent.
- D. For profiling purposes, particularly to send you targeted and interest-oriented communications. The legal basis for processing is your consent.

The following table summarizes the Personal Data processed by Kervis SGR in connection with the Web Platform and the lease of real estate properties, the respective purposes of and legal bases for processing.

Categories of Personal Data	Purposes of the processing	Legal basis
Navigation Data	Collection of statistical information on the use of the Web Platform	Legitimate interest of Kervis SGR
User data collected through the Web Platform	Providing information and responding to inquiries	Consent
	Direct Marketing	Consent
	Profiling	Consent

## 5. Data recipients

Your Personal Data are processed by Kervis SGR personnel and, if necessary to fulfill the purposes indicated above, your Personal Data may be processed by third parties that may also be specifically appointed as data processors.

The categories of recipients to whom your Personal Data may be disclosed are the following: (i) real estate brokers appointed by Kervis SGR to offer the real estate properties for rent, who may contact you following your request made through the Web Platform; (ii) property managers; (iii) IT providers; (iv) marketing agencies.

### Transfer of data to extra EEA countries

For data storage purposes, your Personal Data may be transferred to third parties appointed as data processors, also outside the European Economic Area. In such case, we will ensure that Kervis SGR has adopted appropriate safeguards, including standard data protection clauses adopted by the EU Commission in order to guarantee an adequate level of protection. You may request to obtain evidence of the safeguards implemented by Kervis SGR by contacting us at [privacy@kervissgr.com](mailto:privacy@kervissgr.com).

## 6. Data retention

Your Personal Data will be retained for a period of twelve months from the collection.

We may retain your Personal Data for a further period in the event it is deemed necessary to protect the rights of Kervis SGR (e.g., in case of potential disputes), comply with legal obligations and/or for complying with any requests from competent authorities.

## 7. Possible consequences for failure to provide Personal Data

The collection of Personal Data marked with an asterisk (\*) in the data collection form on the Web Platform is necessary to attend your queries. Failure to provide such Personal Data will have no other effect than to prevent us from providing feedback on your request.

## **8. Marketing and Profiling**

We will only send marketing communications to the user with your specific consent. These communications include news, information, and updates about our products and services, offers, gifts, promotions, special events, projects supported by Kervis SGR, and other communications that we believe may be of interest to the user.

If the user has consented to profiling, we may process their personal data through automated decision-making tools, in order to personalize their experience on the Web Platform based on their interests and purchasing habits, and to improve our services and products. [The logic followed in our profiling activities involves clustering users based on certain types of provided personal data (usage patterns of the Web Platform)]

## **9. Automated decisions**

We will not make any decision based solely on automated processing of Your Personal Data which produces legal effects concerning you or similarly significantly affects you.

## **10. Rights of the data subject**

At any time, you have the right to ask Kervis SGR whether or not your Personal Data is being processed and, if so, to request access to, rectification and/or deletion of the same or restriction of the processing concerning you or to object to its processing, as well as the right to data portability.

If you have given your consent for marketing and profiling purposes, you may revoke it at any time, free of charge.

In case you wish to access or correct your Personal Data, intend to exercise any of your rights, or should you have any questions about this Privacy Notice, you may contact us at [privacy@kervissgr.com](mailto:privacy@kervissgr.com).

## **11. Supervisory authority**

In the event of a breach of applicable data protection laws you have also the right to file a complaint with the competent data protection authority. For further information, you may visit the website of the Italian Supervisory Authority (Garante per la Protezione dei Dati Personali): <https://www.garanteprivacy.it/>.



**Data collection form – tick-the-box**

- I authorize Kervis SGR to process data as outlined in the privacy policy.
- I consent to receiving information and commercial communications regarding the market and real estate projects (point 8 of the privacy policy).
- I consent to the processing and profiling of collected data in order to receive targeted communications tailored to my interests (point 8 of the privacy policy).