

## INFORMATION NOTICE

European Regulation 2016/679 (hereinafter "GDPR" or "Regulation") requires Nova Investment Management Limited, as data controller (hereinafter "Data Controller" or "Company"), to inform the users (hereinafter, also, "Data Subject" or "you") about personal data processing<sup>1</sup> methods and purposes (hereinafter "Personal Data<sup>2</sup>").

This information notice is provided solely for the website [www.novainvestment.ie](http://www.novainvestment.ie), (hereinafter "Website") and it does not concern other websites accessible by the user through the links contained within the Website. Please check the information notices provided by third-party websites accessible through this Website and identify the applicable terms and conditions concerning the processing of your Personal Data.

### 1. Who is the Data Controller and who to contact?

The company that will carry out, as the Data Controller, the processing of Personal Data according to the purposes and methods indicated in this notice is Nova Investment Management Limited, 33 Sir John Rogerson's Quay, D02 XK09, Dublin, Ireland.

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

Email: [privacy@novainvestment.ie](mailto:privacy@novainvestment.ie)

Mailing Address:

Nova Investment Management Limited  
33 Sir John Rogerson's Quay, D02 XK09, Dublin, Ireland

Nova Investment Management Limited may collect and process your Personal Data for the purposes described below in section 2 of this notice. Please note that the Company processes Personal Data as Data Controller with reference to these cases.

### 2. Purpose of the processing and categories of Personal Data processed

While browsing this Website, servers and software procedures aimed at ensuring the proper functionality of this Website will collect Personal Data during its normal operation. The transmission of Personal Data is implicit due to the use of internet communication protocols. This data is not collected in order to be associated with identified Data Subjects; however, it could allow the identification of users through the elaboration and association with other data owned by third parties.

This category of Personal Data includes IP addresses or domain names used by users to connect to the Website, URI addresses (Uniform Resource Identifier) of requested resources, the time of the request, the method used to process the request to the server, the size of the file received, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to operating systems and the user's IT environment.

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<sup>1</sup> For the purposes of this notice, "Personal Data Processing" shall mean any operation or set of operations, which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction (Article 4(2) of the GDPR).

<sup>2</sup>For the purposes of this notice, "Personal Data" shall mean any information concerning an identified or identifiable natural person (Article 4(1) of the GDPR).

This data is used for the sole purpose of obtaining anonymous statistical information related to the use of the Website and to check if it is functioning correctly.

### **3. Legal basis for processing**

The processing of your Personal Data collected during web browsing is justified under the legal basis that it is necessary for the performance of a contract to which the Data Subject is a party, or in order to take steps at the request of the Data Subject before entering into a contract (Article 6(1)(b) of the GDPR).

### **4. Duration of the Personal Data processing**

Personal Data will be stored for a period of time strictly connected to the pursuing of the purpose for which the data has been collected; in any case the criteria used to determine the aforementioned storage period of Personal Data is based with respect to the data storage periods stated by law and by principles stated by Article 5 of the GDPR.

### **5. Methods of processing and disclosure of Personal Data**

The processing of your Personal Data will be carried out using appropriate tools to ensure security and confidentiality and may be carried out with the help of manual, computerised and electronic tools for storing, managing, and transmitting Personal Data.

Your Personal Data will be made accessible only to authorised persons, who are expressly in charge and instructed by the Data Controller regarding the processing of Personal Data, pursuant to Article 29 of the GDPR.

Furthermore, other trusted companies will carry out the processing of your Personal Data. These companies perform technical and organisational tasks on behalf of the Data Controller (e.g., companies operating for the technical management and maintenance of the Website, third parties with whom the Data Controller collaborates for business services, etc.). The Data Controller has appointed the aforementioned companies as external data processors pursuant to Article 28 of the GDPR.

An updated list of the appointed data processors is available by sending an email to [privacy@novainvestment.ie](mailto:privacy@novainvestment.ie)

### **6. Transfer of Data outside Europe**

Your Personal Data is processed by the Company within the territory of the European Union and, if necessary, for technical or operational reasons, the Company reserves the right to transfer your Personal Data to countries outside the European Union subject to the existence of European Commission "adequacy" decisions, or on the basis of adequate guarantees, or on the specific exceptions provided for by the Regulation.

### **7. 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;
- 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 the GDPR;
- e) a right to object to the processing of his/her data;
- f) a right to lodge a complaint with the *Data Protection Commission* in Ireland 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 the GDPR.

At any time, you will be able to exercise your rights by sending an email to [privacy@novainvestment.ie](mailto:privacy@novainvestment.ie)

We may amend this information notice from time to time. Please, visit the Website to ensure that you are always up to date about all processing activities and our compliance with applicable Data Protection legislation.