

COOKIE POLICY

In compliance with the provisions of the laws in force on the protection of personal data, including Regulation (EU) 2016/679 (hereinafter, the "Regulation"), with this policy, Green Arrow Capital SGR, in its capacity as Data Controller (hereinafter, "SGR"), intends to provide users with information on the cookies installed on its company website (hereinafter, the "Website").

INTRODUCTION

Green Arrow Capital SGR does not require users to provide their personal data to browse the Website.

COOKIES

Cookies are text files that the servers of visited websites can store in the memory of the devices used by the user (PC, smartphone, tablet). The information contained in the cookies is then resent to the servers when the user revisits the same websites. Cookies can be stored permanently until they expire (so-called persistent cookies), but can also be removed by closing the browser or be stored for a limited period of time only (so-called session cookies).

In the same way, cookies can be installed by the website being visited (so-called first party cookies), but also by other websites (so-called third party cookies) and are used to perform computer authentications, monitor sessions and store information on the activities of users that access a particular website. According to the purposes for which they are used, cookies fall into the following categories:

- **Browser and functional cookies:** used respectively for authentication purposes and to enhance the experience of the user (e.g. storage of language preferences);
- **Analytics cookies:** used by the website manager to collect information on the users that visit the website;
- **Profiling cookies:** used for advertising purposes to send messages in line with the preferences expressed by the user when surfing the web;
- **Social Cookies:** used to allow interaction with social networks.

As per the general provision of the Italian Data Protection Authority of 8 May 2014 on the "Identification of the Simplified Arrangements to Provide Information and Obtain Consent Regarding Cookies", the following are considered technical cookies, and thus, on the basis of the laws in force it is not necessary to acquire the consent of the user for their installation:

- **Browser and functional cookies;**
- **Analytics cookies.**

FIRST-PARTY TECHNICAL COOKIES

This Website uses the following kinds of first-party cookies:

a) **session cookies:** fundamental for allowing the user to navigate normally within the Website and make use of the related services correctly. They are not stored on the computer of the user, and are erased when the browser is closed;

b) **functional cookies:** aimed only at improving and speeding up browsing on the Website, through the storage of certain selections made by the user (such as language preferences). Therefore, these are tools used by the Data Controller to ensure, for example, efficient browsing, session stability, continued log-in settings and the pre-selection of the browsing country. They are also used to remember the choices made by the user, in anonymous form, with regard to the viewing of certain page elements, such as, for example, information and communication banners.

As already specified, the use of cookies and the processing activities connected to them do not require the prior consent of the user. The possibility remains, in any case, for users to prevent the installation of these technical cookies at any time using the settings on their browsers, as indicated later in this policy. However, such a choice could complicate, slow down and sometimes block browsing on the Website, and more generally, the Internet.

THIRD-PARTY TECHNICAL COOKIES

The Website also uses cookies not managed and controlled by the Data Controller, as they belong to third parties. More specifically, these are **Google Analytics cookies**, a web analytics service provided by Google, Inc., which uses the cookies to collect information on how users use the Website (number of visitors, pages visited, time spent on the website, conversions, etc.)

anonymously and in aggregate form.

This information is used, generally, to improve the functions of the Website, allowing, for example, any errors detected by users to be registered and thus guaranteeing smoother and more immediate browsing.

However, it cannot be ruled it, as this is an activity beyond the control of the Data Controller,

that Google may expand or cross-reference the information obtained via these cookies - which the browser of the user sends to Google in the United States according to the related terms of service - with other data at its disposal, for purposes beyond the scope of this policy.

SGR does not use (and does not allow third parties to use) the Google analytics tool to monitor or collect the personal identification information of users. Google does not associate the IP address of users with any other data held by Google, nor does it attempt to link an IP address with the identity of a computer user.

To deactivate the installation of this type of cookie, please follow the procedures indicated in the following links:

- [Privacy Policy of Google Analytics](#)
- [Deactivation of Google Analytics cookies](#)

Several functions of the Website, such as videos, photographs or social widgets (Facebook, Twitter, Pinterest, LinkedIn, AddThis) are hosted on external platforms. It is possible that these third parties collect data also if the users do not make use of the service. SGR has no access to the data that has been collected and processed in complete autonomy by the managers of these platforms.

For more information on the processing methods of the data collected, users are invited to read the information notes on privacy provided by the parties that make the services in question available.

- YouTube/Google USA – [Privacy Policy](#)
- +1 button and Google+ (Google Inc.) social widgets. - [Privacy Policy](#)
- like button and Facebook (Facebook, Inc.) social widgets.- [Privacy Policy](#)
- Tweet button and Twitter social widgets (Twitter, Inc.) – [Privacy Policy](#)
- Pin-it button and Pinterest social widgets (Pinterest, Inc.) – [Privacy Policy](#)
- LinkedIn social widgets (LinkedIn Corporation)– [Privacy Policy](#)
- AddThis (Addthis Inc.) – [Privacy Policy](#)

HOW TO DISABLE COOKIES.

Without prejudice to the right to object to the installation of the cookies as illustrated above, considering that the majority of browsers are programmed in such a way as to accept cookies

automatically, the user can choose to not receive them, especially when the third party involved does not offer the possibility of correctly exercising the opt-out option, also by accessing the browser settings and deactivating their use, according to the procedures described at the following addresses:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)
- [Opera](#)

It is to be noted, however, that deactivation of the cookies may complicate browsing on the Internet or hinder the free movement from one page to another and the ability to use of all the functions of the Website.

For more information on cookies, please visit the website www.youonlinechoices.com (limited to the services registered by this platform) to obtain information on how to remove or manage the cookies on the basis of the browser used or to set user preferences for third-party cookies.

DATA CONTROLLER

The Data Controller is Green Arrow Capital SGR, with registered office in Rome, via Parigi 11, represented by its Chief Executive Officer.

The updated list and the names of the Data Protection Officer and the Data Processors are kept at the registered office of the Data Controller.

RIGHTS OF THE USER AND METHODS FOR EXERCISING THEM

Users can exercise the rights granted to them by the laws in force on the protection of personal data, at any time and without any formality, namely:

- a) to ask the Data Controller for access to the Data, its erasure, the rectification of inaccurate Data, the integration of incomplete Data, as well as the restriction on its processing in the cases set out in art.18 of the Regulation;
- b) to object at any time, fully or in part, to the processing of the data necessary for the legitimate pursuit of the interest of the Data Controller;
- c) In the case where the conditions are met for the exercising of the right to portability of the Data referred to in art.20 of the Regulation, to receive the Data provided to the Data Controller in a structured, commonly-used and machine-readable format, as well as, if technically feasible,

to send it to another Data Controller without hindrance;

d) to withdraw consent given at any time;

e) to lodge a complaint with the competent Supervisory Authority.

Users can exercise the rights attributed to them at any time by sending an email to the address privacy@gacsgr.com or by sending a written request via registered letter with return receipt to Green Arrow Capital SGR, for the attention of the Privacy Manager, via Parigi 11 – 00185 Rome.