BASE INVESTMENTS SICAV

PRIVACY NOTICE

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Terms not otherwise defined herein shall have the meaning set forth in the GDPR.

The purpose of this privacy notice (hereinafter the "**Privacy Notice**" or "**Notice**") is to provide you with information on the use of your personal data when navigating the website https://www.basesicav.lu/ (the "**Website**"), in accordance with Regulation (EU) 2016/679 (the "**GDPR**") and the applicable data protection legislation, including the Luxembourg law of 1 August 2018 on the organization of the National Data Protection Commission and the general data protection framework, as amended from time to time and also including the Italian Legislative Decree 196/2003, as subsequently amended by Legislative Decree 101/2018 and subsequent amendments.

This notice governs the processing of personal data collected from users of the Website (the "**User**" or "**Data Subject**"). It does not apply to third-party resources accessible through hyperlinks, nor the processing of investor data, which is governed separately.

1. The data controller

The Data Controller is BASE INVESTMENTS SICAV, registered with the Luxembourg Trade and Companies Register under number B82127 with registered office at 5 Allée Scheffer – L-2520 Luxembourg (hereinafter, the "**Data Controller**" or the "**Fund**").

The Data Controller provides the following email address for all communications: privacy@basesicav.lu

The Data Controller may designate one or more data processors pursuant to Article 28 of the GDPR, who, on behalf of the Data Controller, provide specific processing services or related, instrumental, or support activities, adopting all appropriate technical and organizational measures to protect the rights, freedoms, and legitimate interests of the Users recognized by law.

2. Treatment Description

The personal data collected or provided when using the features available on the Website (the "**Personal Data**" or the "**Data**") are detailed in the table below:

Type	Treatment Purpose	Legal Basis	Retention Period
a. User's email address provided through the form dedicated to sending the newsletter on the Website.	• Sending of informative newsletters concerning BASE INVESTMENTS SICAV.	User's express consent (Article 6, paragraph 1, letter a) of the GDPR). The User may withdraw consent at any time by sending an email to the email address indicated in this Notice or by opting out through the link in the newsletter communication.	Until the User revokes consent and in any case for a period not exceeding 2 years from collection.

b. Data provided by the User via the *"Contact Us" form* on the Website: Name, surname, telephone number, email address and other data voluntarily provided by the User through the contact form.	• Answer to Users's requests, who may be contacted via the email address or telephone number provided.	Pre-contractual measures if related to an User's request (Article 6, paragraph 1, letter b) of the GDPR).	For the time necessary to handle the User's requests and kept for a maximum ten (10) years from the last contact (or as necessary only in case of a formal litigation until full settlement).
	• Exercise the rights of the Data Controller, for example to manage inquiries.	Legitimate interest of the Data Controller to manage inquiries(Article 6, paragraph 1, letter f) of the GDPR).	
c. Users browsing Data • information about the device used (e.g. mobile network system, unique device identifiers), hardware and browser settings, IP address; • web pages visited, duration of the visit, interactions with the page (e.g. scrolling, clicking, etc.), date and time of visits; • other parameters relating to the operating system and IT environment used by the User.	• Monitoring the functioning of the Website, also for the purpose of improving user experience and security. • Provide the features available on the Website	Pre-contractual measures if related to an User's request (Article 6, paragraph 1, letter b) of the GDPR). Legitimate interest of the Data Controller (Article 6, paragraph 1, letter f) of the GDPR).	For a period of two (2) years maximum for security logs, unless required longer in the event of an incident followed by an investigation.

d. Cookies and other technologies for reading/storing information on the User's terminal.	Please refer to the "Cookie Policy" available on the Website.

Technical browsing Data are processed primarily for IT security and Website performance purposes or otherwise subjct to the User's prior consent as described in the Cookie policy.

The provision of Personal Data through the newsletter subscription form and the "Contact Us" form is voluntary. However, failure to provide the Personal Data necessary for these purposes will prevent the Data Controller from sending newsletters or responding to the User's requests, respectively.

Browsing Data necessary for the operation and security of the Website are collected automatically when accessing the Website. Failure to provide such Data may prevent the proper functioning of the Website or limit access to certain features.

3. Processing methods

The processing of Personal Data:

(a) is carried out using the operations indicated in Article 4, paragraph 1, no. 2 of the GDPR, namely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, delation, and destruction of the Data;

(b) is also carried out with the aid of electronic or automated means;

(c) is also carried out using email or other remote communication techniques.

4. Transfer of Personal Data

Data are primarily processed and stored within the European Economic Area ("**EEA**") and Switzerland on the servers of third-party companies duly appointed as data processors.

Switzerland is not part of the EEA but benefit from and adequacy decision by the European Commission (in accordnace with Article 45 of the GDPR) and recognized as providing an adequate level of protection for your Data.

In the event where Personal Data are transferred to or accessed from countries outside the EEA, with no adequacy decision, the Data Controller will ensure that appropriate safeguards are in place (e.g. by executing the European Commision's Standard Contractual Clauses in accordance with with Article 46 of the GDPR), complemented by supplementary technical and organizatonal measures where necessary.

In any case, the User may request further information regarding the transfer of Personal Data by writing to the email address: privacy@basesicav.lu

5. Security measures

The Data Controller implements the appropriate technical and organizational measures to protect the Data against unauthorized access, loss, disclosure, or alteration and destruction, consistent with the measures expressed in Article 32 of the GDPR.

6. Data storage and deletion

Upon expiry of the applicable retention period, Personal Data are securey deleted or anonymized in accordnace with the statutory requirements.

7. Recipients of the Data

For the purposes indicated above, Personal Data may be made accessible or communicated to:

(a) Authorised personnel: authorized representatives and personnel of the Data Controller, acting under its direct authotity and bound by confidentiality and privacy obligations;

(b) Data processors and service providers: third party vendors and contractors acting on behalf of the Data Controller to support the operation and maintenance of the Website;

(c) Public and/or private entities, natural and/or legal persons (such as, for example, legal, administrative and tax consultancy firms, private pension and assistance funds or funds, judicial offices, chambers of commerce), if communication is necessary or functional to the correct fulfillment of the contractual obligations undertaken, as well as the obligations deriving from the law;

(d) Competent authorities: public and supervisory authorities, judicial bodies where disclosure is required by the applicable text, law or regulation.

Personal Data collected will not be made public or disseminated to indeterminate recipients.

8. Rights of the User

The User may exercise the rights provided for in the GDPR within the limits and under the conditions set out therein:

(a) **access to Data (Article 15)**: the User has the right to obtain confirmation as to whether or not Personal Data concerning him or her is being processed and receive a copy thereof, along with information regarding the processing;

(b) **rectification of Data (art. 16)**: the User has the right to obtain the rectification of inaccurate Personal Data concerning him or her without undue delay and/or the integration of incomplete Personal Data;

(c) **erasure of Data or "right to be forgotten" (art. 17)**: the User has the right to obtain the delation of Personal Data concerning him or her without undue delay;

(d) **restriction of processing (art. 18):** the User has the right to obtain the restriction of the processing of Personal Data concerning him or her;

(e) **data portability (art. 20)**: the User has the right to receive the Personal Data concerning him or her, in a structured, commonly used and machine-readable format and request their transmission to another data controller where technically feasible and where processing is based on consent or a contract and carried out by automated means**;**

(f) **withdrawal of consent (Article 7)**: The User has the right to withdraw the consent previously given at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

(g) **Automated decision making (Article 22)**: the Data Controller does not employ automated decision-making processes, including profilling.

9. Right to object to processing

Under Article 21, paragraph 1 of the GDPR, the User has the right to object at any time, on grounds relating to his or her particular situation, to the processing of Personal Data concerning him or her pursuant to Article 6, paragraph 1, letters e) or f) of the GDPR. In addition, the User has an absolute right to object at any time to the processing of his or her Personal Data for direct marketing and communication purposes.

10. Provision of Personal Data

Without prejudice to the data subject's right to provide Personal Data to the Data Controller, the provision of Personal Data may be:

(a) mandatory for the purpose of providing services accessible via the Site, and for purposes related to compliance with obligations set forth by applicable laws and/or regulations, as well as by provisions issued by the competent authorities/supervisory and/or regulatory bodies;

(b) optional, with regard to data provided voluntarily by the User for the purpose of sending an informational newsletter.

Should the User refuse to provide Personal Data to the Data Controller, it may become impossible for the Data Controller to provide the requested services or to grant access to the Site.

Furthermore, please note that the withdrawal of one or more permissions and/or consents previously granted by the User may affect the proper functioning of the Site, the ability to access and/or use the Site correctly, and/or the provision of services by the Data Controller.

11. How to exercise rights

The User may exercise his or her rights at any time by sending an email to privacy@basesicav.lu

The Data Controller undertakes to provide the User with information regarding the action taken regarding a request to exercise his or her rights without undue delay and, in any case, no later than 30 (thirty) days after receiving the request. This initial period may be extended to up to a total of 3 (three) months only in particularly complex cases (in which case the User will be informed).

In accordance with Article 19 of the GDPR, any rectifications, delation, or restrictions on processing carried out at the Data Subject's explicit request, unless this proves impossible or involves a disproportionate effort, will be communicated by the Data Controller to each recipient to whom the Personal Data has been disclosed. The Data Controller may provide the User with the contact details of the recipients upon request.

12. Right to complain

Without prejudice to any administrative or judicial remedy, Users who consider that the processing of their Personal Data infringes the provisions of the GDPR have the right to lodge a complaint with a supervisory authority.

- For the Grand Duchy of Luxembourg, the competent authority is:

Commission Nationale pour la Protection des Données (CNPD)

15, boulevard du Jazz, L-4370 Belval, Grand Duchy of Luxembourg

+352 26 10 60 1

https://cnpd.public.lu (form available online)

- For Italy, the competent authority is:

Italian Data Protection Authority

i) by *email* to garante@gpdp.it or urp@gpdp.it;

ii) by fax to +39 06 696773785; or

iii) by mail to the registered office in Rome (Italy), Piazza Venezia n. 11 – Postal Code 00187, or alternatively by appealing to the judicial authority.

13. Changes to this Notice

The Data Controller reserves the right to amend or update this Privacy Notice from time to time. Any update will be published on the Website. In accordance with Article 13 of the GDPR, if the Data Controller intends to process your Personal Data for purposes other than those indicated in this Notice, it undertakes to provide, prior to such further processing, adequate information regarding such other purposes and to carry out such further processing in compliance with applicable legislation, obtaining the Data Subject's specific consent where necessary.

Last updated: October 2026