

## Privacy Notice

### General Data Protection Regulation

Version dated September 1, 2025.

Data Controller:

MC ADVISORY CSR SRL SOCIETA' BENEFIT (hereinafter "**MCSR**"), a limited liability company (SRL) with share capital of €100,000, registered with the Chamber of Commerce of Cremona-Mantova-Pavia under number 02840490185, with registered office at Via Sant'Ambrogio 21, 27058 Voghera (PV) - ITALY, intra-Community VAT number IT02840490185.

To the attention of all prospective and actual clients of MCSR.

## Introduction to the General Data Protection Regulation (GDPR)

In light of EU Regulation 2016/679 on the protection of personal data (GDPR), we have updated our **Privacy Notice**.

This new Notice is provided pursuant to the above-mentioned Regulation to those who access and browse the website [www.robo4advisor.com](http://www.robo4advisor.com) (the “website” or the “platform”) and explains the essential points on how we collect registered members’/users’ data, the reasons why such data are processed and the rights of our registered members/users. This Notice applies only to the [robo4advisor.com](http://robo4advisor.com) domain and does not concern any other external website that may be accessible from the pages of the platform. By accepting the Privacy Policy at the time of registration, you expressly consent to the use, storage and disclosure of your personal data according to the methods described on this page.

## WHO IS THE DATA CONTROLLER?

MC Advisory CSR SB Srl is the controller of your personal data (“Mcsr” or the “Controller”).

## WHAT IS PERSONAL DATA?

Certain sections of the website can be accessed without revealing your identity or other personal information to us, with the exception of your email address, which will be entered into Mcsr’s database. If you decide to access the reserved sections and use the services provided by Mcsr (see the “Terms of Use” page in this regard), you will be asked to provide additional personal data, that is, information suitable to identify, directly or indirectly, a natural person. In this case, that person is You, who are browsing the website. In particular, Mcsr processes the following data:

- your first name and surname;
- your contact details (namely, telephone number and email address);
- the IP address and the URL used;
- username and password;
- your answers to questions concerning your professional activity in order to activate the requested services;
- information acquired through your interaction with our site, such as statistics on the number of contacts, traffic to and from the site, searches carried out, funds and portfolios viewed, and any portfolios uploaded;
- data you voluntarily provide in this context to use our services and subscribe to a subscription plan (for example, tax code and/or VAT number).

## FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

Mcsr collects your personal data for the following purposes:

**Main purpose:** registration as a new registered member and/or user and management of the entire relationship with the data subject, as well as offering and providing the data subject with services to which he or she has access as a registered member and/or user.

**Legal basis:** performance of pre-contractual measures and of a contract.

Further purposes:

- to personalize, measure and improve our future services, content and advertising;
- to submit any questionnaires to you for the purpose of improving our services;
- to inform you about our services, send you commercial communications, updates and promotional offers;
- to statistically process the data of all users in anonymous and aggregated form in order to provide value-added services.

**Legal basis:** legitimate interest.

If you send us email messages, we may retain your message, email address and contact information in order to respond to your requests.

## WHO ARE THE DATA PROCESSORS OF YOUR DATA?

The Controller has appointed data processors (Mcsr internal staff) who manage your data in the name and on behalf of the Controller.

## HOW DO WE PROCESS YOUR DATA?

The processing of personal data will mainly be carried out with the aid of electronic or otherwise automated means, but also using manual supports, according to methods and with tools suitable to guarantee the security and confidentiality of the data.

## TO WHOM MAY YOUR DATA BE COMMUNICATED?

Your data may also be disclosed:

- to all those parties (including Public Authorities) that have access to personal data by virtue of regulatory or administrative provisions;

- to companies, consultants or professionals who may be entrusted with the installation, maintenance, updating and, in general, management of Mcsr's hardware and software or of the hardware and software used by the Company to provide its services;
- to companies or Internet providers entrusted with sending documentation and/or informational material;
- to companies entrusted with processing and/or sending advertising and informational material on behalf of Mcsr;
- to all those public and/or private entities, natural and/or legal persons (legal, administrative and tax consulting firms, Judicial Offices, Chambers of Commerce, Chambers and Labour Offices, etc.), where disclosure is necessary or functional to the proper fulfilment of contractual obligations undertaken, as well as obligations arising from the law.

The data will not be transferred or disseminated, except in anonymous and aggregated form, for statistical or research purposes. Mcsr does not transfer or assign your personal data to third parties for commercial purposes.

#### **WHERE, HOW AND FOR HOW LONG DO WE RETAIN YOUR DATA?**

Your personal data will be stored on Mcsr's servers at its hosting providers (located within the European Union) for the entire duration of the contractual relationship and in any case for a period of 10 years after the conclusion of the contract. We inform you that, should you intend to withdraw your consent to the processing of personal data while contractual relationships with the Data Controller are in force, the latter will not be able in any way to fulfil the obligations arising from the existing contract; therefore, withdrawal of consent to the processing of your data will result in the early termination of the contract: this choice will have no consequence with respect to services already performed by both parties. Furthermore, in the event of a request by you for erasure, blocking or anonymization of the data, the Data Controller will not be able to contact you in any way. Without prejudice to the above, we hereby inform you that - in compliance with legal obligations - the Controller may further reserve the right to retain your data where this is imposed by mandatory rules, whether national or EU.

#### **WHAT ARE YOUR RIGHTS?**

As a data subject, you have the right to:

- access your data and request a copy thereof;
- request the rectification or updating of your data, where inaccurate or incomplete;
- request, where certain circumstances exist, the erasure of data relating to you or the restriction of processing concerning your data.

For any questions regarding Privacy and the protection of your personal data or to exercise your rights as a data subject, you may write to the Data Controller at Mcsr, via Sant'Ambrogio 21, 27058 Voghera (PV), or at [info@mcadvisory.it](mailto:info@mcadvisory.it).

#### **WHAT ARE THE CONSEQUENCES OF FAILURE TO CONSENT TO DATA PROCESSING?**

The provision of data for the purposes described above is voluntary but necessary for registration on the website and for completion of the subscription contract for the services provided by Mcsr. Any refusal to provide the data in question will make it impossible to complete the registration procedure and to receive the services offered exclusively to users of the Reserved Area of the website.

#### **CHANGES TO THE PRIVACY POLICY**

Mcsr may modify the content of this Privacy Policy at any time by publishing the new version on this page. All new terms and conditions will be effective from the date of publication. Mcsr will give notice via the [robo4advisor.com](http://robo4advisor.com) site and may, but is not required to, send an email message to the address provided by you. We invite you to check this page periodically to verify the Privacy Policy in force. Following each change, Mcsr will consider your use of the platform as acceptance of the amended Privacy Policy.