

## COOKIES POLICY

### What is a Cookie?

Cookies are small text strings used to perform computer authentication, session monitoring and storage of specific information about users accessing the server and are usually present in each user's browser. Under the EU's GDPR and the ePrivacy Directive, the use of cookies generally requires user consent, unless the cookies are strictly necessary for the functioning of the website. Certain website operations would not be possible without the use of cookies, which in some cases are technically necessary. Current EU legislation allows "technical" cookies to be used in the absence of consent; these include:

- Cookies implanted in the user/contractor terminal directly by the owner of the single website, if they are not used for other purposes: this is the case of session cookies, authentication cookies, customization cookies (for example, for the choice of the navigation language), etc.
- Cookies used to statistically analyse accesses/visits to the site (so-called "analytics" cookies) which pursue exclusively statistical purposes and collect information in aggregate form only.

"Profiling cookies", which are used to create user profiles and to send advertising messages in line with the preferences expressed by the user during the web navigation require consent due to the particular invasiveness that such cookies may have on the private sphere of users. EU legislation requires that the user must be adequately informed to express a valid consent about their use.

A further element to consider concerns third party cookies. These types of cookies integrate features developed by third parties within the pages of the site such as icons and preferences expressed in social networks in order to share site content or to use third party software services (such as software to generate maps and additional software that offer additional services). These cookies are sent from third party domains and from partner sites that offer their functionality between the pages of the site.

### Cookies on this Web Site

Nova Investment Management Limited (hereinafter, also, "Data Controller") does not use any cookies.

### How to disable cookies

The use of "technical" cookies by Nova Investment Management Limited can be avoided through the settings of the browser. Although the "Help" function of most browsers indicates how to configure it so that it signals when a new cookie is received on the device, refuse new cookies, or disables them altogether, to facilitate users, the links to the instructions on how to disable cookies through the configuration of different browsers are shown below.

Microsoft Edge: [Delete and manage cookies - Microsoft Support](#)

Google Chrome: [Clear, allow & manage cookies in Chrome - Computer - Google Chrome Help](#)

Mozilla Firefox: [Block websites from storing cookies and site data in Firefox | Firefox Help \(mozilla.org\)](#)

Opera: [Web preferences - Opera Help](#)

Safari: [Clear the history, cache, and cookies from Safari on your iPhone, iPad, or iPod touch - Apple Support](#)

After this operation, however, some functions of the web pages may not be performed correctly.

## Methods of processing and disclosure

The employees and partners of Nova Investment Management Limited may process the personal data collected using cookies under the authority of Nova Investment Management Limited as controller and/or processor, pursuant to article 29 of the European Regulation 2016/679.

In addition, the processing may be carried out by companies trusted by Nova Investment Management Limited as data processors, pursuant to article 28 of the European Regulation 2016/679.

An updated list of third parties who are identified as "Processors" is available, by request, sending a communication to the address below or an email to: [privacy@novainvestment.ie](mailto:privacy@novainvestment.ie)

Personal data will not be disclosed in any way.

## 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 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 GDPR.

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

## Data Controller

The company that will carry out, as the data controller (hereafter 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