PRIVACY STATEMENT PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 for candidates for employment or collaboration in various capacities

Data protection is a very serious matter for us, so we would like to inform you about the way in which your data is processed and the rights you can exercise under current data protection legislation, in particular EU Regulation 2016/679 (hereinafter also: "GDPR").

1. Joint Controllers * and DPO

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Data Protection Officer (DPO) Telephone: +39 0523 1865049 E-mail: g.galli@gallidataservice.com

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* The essential content of the co-ownership agreement, pursuant to Article 26 of the GDPR, is made available to the data subject

2. The categories of data that are processed

The categories of "personal data" (ex. Art. 4.1 of the GDPR) processed by the Joint Controllers may include, but are not limited to:

- Personal and identification data (e.g. name, date of birth, place of birth, nationality, tax code, VAT number, occupation/profession, etc.);
- Contact data (e.g. address, e-mail address, telephone number, etc.);
- Data on education professional experience and activities performed;
- Special categories of personal data (e.g. general state of health, political opinions, religious or philosophical beliefs and trade union membership).

3. Lawfulness and purpose of processing

Personal data is processed in accordance with the provisions of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. Details are provided below:

3.1 Purposes aimed at fulfilling a legal obligation (ex Art. 6(1)(c) GDPR)

The purpose of processing personal data is to enable the assessment of the application of the data subject (candidate), whether for a specific vacancy or spontaneously, and in particular, within this context, for the following purposes:

a. Fulfilment of legal obligations related to the application and possible activation of the above-mentioned job placement (e.g. verification of membership of a protected category).

<u>The retention period of personal data for the purposes of this section is:</u> <u>For the purpose a: 12 months after receipt of the spontaneously submitted CV.</u>

3.2 Purposes of the performance of a contract or pre-contractual measures (ex Art. 6(1)(b) GDPR)

The purpose necessary for the execution of pre-contractual measures is:

a. Management of the selection process with reference to one or more vacant positions and, therefore, aimed at the establishment of an employment contract (including, but not limited to, the assessment and identification of one or more persons to fill the aforementioned positions and the collection of any information necessary for recruitment and entering into the relevant contract).

The retention period of personal data for the purposes of this section is:

For the purpose a: 12 months from the acquisition of the information, except in the case of recruitment (in which case the retention period will follow the appropriate timeframes provided for or necessary in relation to the individual relationships established and indicated in the respective and appropriate privacy statements).

4. Recipients or categories of recipients of personal data (ex art. 13 paragraph 1 (e) GDPR) *

Within the scope of the above-mentioned purposes, the Joint Controllers may communicate your data to

- Offices and internal functions of each Joint Controller;
- companies and professional operators providing IT services;
- occupational physician (if a preventive visit or other initiative in favour of the health plan is required);
- payroll/employment consultants, professional firms in general (lawyers, accountants, etc.);
- consulting companies.

* Further information and the complete list of Recipients (ex art. 4.9 of the GDPR) are available from the Joint Controllers at the above-mentioned addresses.

5. Recipients or categories of recipients of personal data (ex Art. 13(1)(f) GDPR) and transfer of data to non-EU countries The Joint Controllers inform you that they have no intention of transferring your data to countries outside the EU and EEA for the above-mentioned purposes.

6. Rights of the Data Subject (pursuant to Art. 13(2)(b) of the GDPR)

The person concerned may assert the following rights:

- the data subject's right of access [Art. 15 of the EU Regulation] (the possibility to be informed about the processing carried out on one's Personal Data and, if necessary, to receive a copy of it);
- right to rectification of one's Personal Data [Art. 16 of the EU Regulation] (the data subject has the right to rectification
 of inaccurate personal data concerning him/her);
- right to the deletion of one's own Personal Data without undue delay ('right to be forgotten') [Art. 17 of the EU Regulation] (the data subject has, as well as will have, the right to the deletion of his or her own data);
- right to limitation of the processing of one's Personal Data in the cases provided for in Article 18 of the EU Regulation, including in the case of unlawful processing or contestation of the accuracy of Personal Data by the data subject [Article 18 of the EU Regulation];

- right to data portability [Art. 20 of the EU Regulation], the data subject may request his or her Personal Data in a structured format in order to transmit it to another data controller, in the cases provided for in that Article;
- right to object to the processing of one's own Personal Data [Art. 21 of the EU Regulation] (the data subject has, as he or she will have, the right to object to the processing of his or her own Personal Data);
- right not to be subject to automated decision-making processes, [Art. 22 of the EU Regulation] (the data subject has, as will have, the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject may be obtained by requesting a full extract of the above-mentioned articles from one of the co-owners.

The above-mentioned rights may be exercised in accordance with the Rules by sending an e-mail to the following address: dpo@gallidataservice.com.

In accordance with Article 19 of the EU Regulation, the Joint Controllers shall inform the recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing required, where possible.

In order to allow for a faster response to your requests made in the exercise of the aforementioned rights, the same may be addressed to the Joint Controllers, also individually, by addressing them to the addresses indicated in point 1.

7. Right to lodge a complaint (ex Art. 13(2)(d) GDPR)

If the data subject considers that his or her rights have been compromised, he or she has the right to lodge a complaint with the Italian Data Protection Authority, in accordance with the procedures indicated by the Authority itself at the following address: <u>http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524</u> or by sending written notice to the Data Protection Authority.

8. Possible consequence of non-disclosure of data and nature of the provision of data (pursuant to Article 13(2)(e) of the GDPR)

8.1 In case of fulfilling legal or contractual obligations

Please note that if the processing purposes have a legal or contractual (or even pre-contractual) obligation as a legal basis, the data subject must necessarily provide the requested data.

Failure to do so will make it impossible for the Joint Controllers to pursue the specific processing purposes.

When the data are no longer needed, they are routinely deleted; if deletion is impossible or only possible with disproportionate effort due to a particular storage method, the data may not be processed and must be stored in inaccessible areas.

9. Existence of automated decision-making (including profiling)

The use of purely automated decision-making processes as detailed in Article 22 of the GDPR is currently excluded. Should it be decided in the future to establish such processes for individual cases, the data subject will be notified separately if this is required by law or updated in this policy.

10. Treatment modalities

Personal data shall be processed in paper, computerised and telematic form and entered into the relevant databases (candidates, etc.), which may be accessed and thus become known to the employees expressly designated by the Data Controller as Persons in charge of and authorised to process personal data, who may carry out consultation, use, processing, comparison and any other appropriate operation, including automated operations, in compliance with the provisions of the law necessary to guarantee, among other things, the confidentiality and security of the data as well as their accuracy, updating and relevance to the stated purposes.

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