



TEORESI S.P.A.

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PRIVACY NOTICE

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

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INTRODUCTION

Teoresi S.p.A., in accordance with the applicable legislation, undertakes to process the Data concerning you in accordance with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 " on the protection of natural persons with regard to the processing of personal data" ("GDPR").

Teoresi S.p.A. invites you to read the following information notice drawn up pursuant to Articles 13 and 14 GDPR. This notice is addressed to all those who are engaged in a professional activity and/or service in favour of Teoresi.



1. DATA CONTROLLER

The Data Controller treatment of your Data is Teoresi S.p.A., with registered office in Turin, Via Perugia, 24 - 10152 - P.IVA 03037960014.

The contact details of the Data Controller are: Tel. 011.2408000; e-mail: <u>privacy@teoresigroup.com</u>; PEC: <u>teoresi.adm@pec.it</u>

2. DATA PROTECTION OFFICER

Teoresi has appointed the Data Protection Officer provided for by the GDPR ("Data Protection Officer" or "DPO"). For all issues related to the processing of your Personal Data and/or to the exercise of your rights under the Regulation itself, listed under point 4 of this notice, you may contact our DPO at the following email address: dpo.ask@teoresigroup.com

3. CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING

The Data Controller will process your personal data collected during the establishment and the execution of the employment contractual relationship according to Article 6, paragraph 1, letter a) ("the data subject has given consent to the processing of his or her personal data for one or more specific purposes"), b) ("processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"), letter c) ("processing is necessary for compliance with a legal obligation to which the controller is subject"), letter f) ("processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child") of the GDPR.

The following Data may be processed:

a) Personal data, such as: first name, last name, gender, tax code, residential address and telephone number, place and date of birth, e-mail address and corporate role.

Personal data will be processed for the execution and management of the contractual and/or commercial relationship with the company, for the fulfilment of legal obligations to which the Data Controller is subject and for sending commercial and promotional communications.

b) "Judicial" information relating to criminal convictions and offences or related security measures.

The processing of "judicial" information will take place exclusively within the limits of what is necessary for the implementation of the obligations provided for by the anti-mafia and anti-money laundering regulations, to comply with the ISO/IEC 27001 standard (so-called computer crimes) or in case a specific authorization is demanded by security public authorities according to Article 6, paragraph 1, letter c) of the GDPR ("processing is necessary for compliance with a legal obligation to which the controller is subject").

4. PURPOSE OF THE PROCESSING

The data you provide will be processed for the following purposes:



- management of the pre-contractual stages and of the existing contractual and/or commercial relationship,
- fulfilment of any other obligation required by the law,
- satisfying operational, organisational, managerial, fiscal, financial, insurance and accounting requirements relating to the contractual relationship established,
- managing access at customer locations or sites,

In addition, your data will also be processed for the following purposes:

Safeguard of company assets and prevention of unlawful acts. This purpose is achieved, inter alia, by
using the video surveillance system. The installation of image detection systems is carried out in
compliance with the rules on the protection of personal Data and other applicable legal provisions. Data
processing through the video surveillance system will be in any case appropriate and not excessive in
relation to the purposes pursued.

The provision of your personal Data is mandatory because their processing is necessary for the correct establishment and execution of the contractual and/or commercial relationship, for sending commercial and promotional communications and to allow the Data Controller to fulfil the related legal obligations according to Article 6, paragraph 1, letter b GDPR ("processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"). Any refusal to provide the aforementioned Data will make it impossible for the Data Controller to enter any contractual and/or commercial relationship with you or to execute it properly.

5. PROCESSING METHODS

The Data will be processed and collected through paper-based instruments, computer and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security and confidentiality of the Data, in accordance with the provisions of Art. 32) of the European Privacy Regulation UE/2016/679 (GDPR).

Your Data will be processed only by personnel expressly authorized by the Data Controller.

6. DATA COMMUNICATION SYSTEMS

The Data will be included in the records and registers required by law and will be transmitted to Social Security Institutes, financial offices and Public Administrations, where required (e.g. Revenue Agencies, Municipalities, Regions, Provinces, Chambers of Commerce, I.N.P.S., I.N.A.I.L.) in compliance with the law.

Your Personal Data may also be shared by the Company with the following subjects:

- all persons to whom the right of access to such data is recognized by law,
- our collaborators, employees in charge of processing data as part of their duties,
- all those physical and/or legal, public and/or private persons when the communication is necessary or functional to the constitution and management of the working relationship, in the ways and for the purposes illustrated above (e.g. companies or professional firms that provide assistance and advisory services to the Company in the payroll and contributions processing sector).
- 7. DATA RETENTION PERIOD



Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be kept for the time necessary to achieve the purposes effectively pursued, pursuant to Art. 5 of the GDPR and in connection with the contractual and/or commercial relationship. In any case, the retention period of your personal data will not exceed:

- 10 years in compliance with the obligations relating to the holding of accounting records and in any case for the time necessary for the legal protection of the Data Controller;
- 72 hours for Data collected through the video surveillance system.

8. RIGHTS OF DATA SUBJECT

As a data subject, you may exercise the rights provided for by Art. 15 et seq. GDPR against Teoresi. In particular, you may obtain:

- access to your personal Data and all other information set out in Art. 15 GDPR;
- the rectification of Data if they are inaccurate and/or their integration if they are incomplete (Art. 16 GDPR);
- the erasure (so-called "right to be forgotten"), anonymization or blocking of Data processed in violation
 of the law, including Data whose storage is not necessary in relation to the purposes for which the data
 was collected or subsequently processed, except for that information which must be mandatorily
 stored by the Data Controller and unless there is a legitimate reason prevailing over that of the Data
 subject to continue the processing activity (Art. 17 GDPR);
- processing limitation of your Personal Data if one of the cases referred to under Art. 18 GDPR applies.

According to what is prescribed by the European Regulation, you also have the right:

- to object to the processing of your Data, unless the processing is necessary for the performance of public interest tasks (Art. 21 GDPR);
- to withdraw consent. Such withdrawal, however, does not affect the lawfulness of the processing activities carried out before (Art. 7(3) and Art. 13(2)(c) GDPR)
- to lodge a complaint to the Guarantor for the Protection of Personal Data, pursuant to art. 77 GDPR, whether you consider that your Data Processing infringes the legislation in force.
