

## PRIVACY POLICY

### 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 ("Data Subjects").

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#### 1. DATA CONTROLLER

The Data controller of your Data processing 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: [privacy@teoresigroup.com](mailto:privacy@teoresigroup.com); PEC: [Teoresi.adm@pec.it](mailto:Teoresi.adm@pec.it).

#### 2. DATA PROTECTION OFFICER

Teoresi has appointed the Data Protection Officer so as required by the GDPR ("Data Protection Officer" or "DPO"). entrusted by law with monitoring the compliance with the Regulation, as well as tackling requests from data subjects within the context of the legitimate exercise of the rights recognized by the Regulation and acting as a reference point towards the Privacy Authority.

For all issues related to the processing of your Personal Data and/or the exercise of your rights under the Regulation itself, listed under point 10 of this notice, you may contact our DPO at the following email address: [dpo.ask@teoresigroup.com](mailto: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. 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 (meaning common identification and contact data), residence permit (if any), logs, IP address, entrance and exit time, curriculum vitae, performance data, disciplinary measures, professional training data.

Personal data will be processed for the execution and management of the employment contract between the company and the employee and for the fulfilment of legal obligations the Data Controller is subject to.

- b) "Special" categories of personal data, as per art. 9 of the GDPR, namely health data (limited to protected categories belonging) and trade union membership.

The processing of "special" data will be carried out only if strictly necessary to fulfil the obligations with regard to labour law, social security and social protection (e.g. the right to benefits provided for by law or by the future labour contract; the right to obtain work permits and expectations for political or trade union offices, etc.).

- c) "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 relating to the specific function of the employee and those 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"*).

- d) tax data and income status
- e) banking and salary data

The processing of personal data referred to in points d) and e) will be carried out for the purposes of the execution of the employment contract the data subject is party to and of the fulfilment of a legal obligation the Data Controller is subject to.

- f) Pictures and/or videos

Such data processing will be aimed at identifying the employee within the company organization, as well as through the personal badge for the purposes of corporate security. The legal basis for the processing is the legitimate interest of the Data Controller.

Pictures and/or videos may also be taken for institutional, public relations and informational purposes related to corporate activities. In such cases, an authorisation for the processing of the Data Subject's data is necessary. When the authorization is acquired, all the necessary information relating to the processing at issue will be provided. The legal basis is therefore the consent of the Data Subjects. The provision of

Personal Data is optional. If you do not wish to appear in any pictures and/or videos, we invite you to stay outside the shooting area.

#### **4. PURPOSES OF THE PROCESSING**

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

- management of the existing contractual relationship,
- preparation, management and payment of remuneration, social security contributions and social assistance charges relating to the existing employment relationship,
- drafting, updating and storage of all books and documents required by labour law,
- correct use of the company's IT tools in order to minimise the risk of unauthorised access and the introduction of viruses, as well as to verify the identity of authorised parties when accessing IT tools,
- fulfilment of all contractual (including the collective ones) and legal obligations concerning labour law, health and safety in the workplace,
- satisfying operational, organisational, managerial, fiscal, financial, insurance and accounting requirements relating to the established contractual relationship,
- managing access at customer locations or sites,
- organization of travel and business trips,
- any request for special permits or authorisations (e.g. Security Clearance),
- fulfilment of any other obligation required by the law, regulations or European Community legislation.

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 regulations 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 will not exceed the purposes pursued.

The provision of your personal Data is necessary for the correct establishment and execution of the employment relationship and to allow the Data Controller to fulfil the related legal obligations. Any refusal to provide the aforementioned Data will make impossible for the Data Controller to enter any working relationship with you or to execute it properly.

In order to pursue the above organizational, contractual, administrative purposes, arising from legal obligations, the Data Controller may collect and process personal data relating to your family members (e.g. granting family allowances)

#### **5. NATURE OF DATA PROVISION**

The provision of your personal data, and likely the personal data of your family members, is necessary for the abovementioned purposes, in the light of the legal and contractual obligations the Data Controller is to be compliant with, in order to correctly begin the employment relationship and ensure the proper management and continuation

thereof. Failure to provide, in whole or in part, such Personal Data, will make it impossible for the Data Controller to establish with you any employment relationship or to guarantee the proper execution thereof.

The purposes relating to pictures and/or video recordings, for which the consent of the Data Subject is required, make an exception to the mandatory character of the processing, as the latter is optional in nature. This applies without prejudice for the lawful exercise of the right to object at any time to the processing concerned. With regard thereto, reference is made to the following art. 10 of this Privacy Notice.

## **6. PROCESSING METHODS**

Data will be processed and collected through paper-based instruments, computer and telematic media, suitable for ensuring the security and confidentiality of the data, in accordance with the provisions of art. 32) of the European Privacy Regulation UE/2016/679 (GDPR) and art. 31) of Legislative Decree 196/03 on "appropriate security measures" and art. 33) of Legislative Decree 196/03 on "minimum security measures".

However, by carrying out the processing operations the minimum level of data protection required by law is guaranteed by adopting all the technical, computer, organizational, logistical and procedural security measures, as provided for in Annex B of Legislative Decree no. 196/03. In particular, the transfer of your Data is subject to encryption.

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

## **7. DATA RECIPIENTS**

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 Identifying 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 data processing, 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),
- customers and/or suppliers only to achieve the purposes related to the performance of functional activities with respect to the company's business (e.g. to allow access to their premises)
- other Group companies (please see art. 8)

## **8. DATA PROCESSOR**

Your personal data may be processed by third parties, which, by virtue of their appointments as Data Processors pursuant to art. 28 of the Regulations, carry out on behalf of Teoresi further activities linked to the employment relationship.

Your personal data may also be disclosed to the other companies of Teoresi Group based both in Europe - Italy and Germany - and in third countries - United States of America and Switzerland -, which act as Data Processors by

virtue of intra-group agreements. In any case, all the guarantees required by the GDPR for the protection of personal data will always be applied.

#### **9. 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 pursued, pursuant to art. 5 of the GDPR and in connection with the employment 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 from the last recording data 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.

#### **10. RIGHTS OF DATA SUBJECT**

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

- access to your personal data and all other information set out in Article 15 GDPR;
- the rectification of data if they are inaccurate and/or incomplete personal data completed (Article 16 GDPR);
- the erasure (so-called "right to be forgotten"), anonymization or blocking of Data processed in breach 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 that must be mandatorily stored by the Data Controller and unless there is a legitimate reason prevailing over the one 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 Article 18 GDPR applies.

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

- to object the processing of your Data, unless one of the conditions set out in art. 23 of the GDPR occurs 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.

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