

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 your personal data 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 privacy notice drawn up pursuant to Articles 13 and 14 GDPR. This privacy notice is addressed to all those who undertake a recruitment process for a specific job position for Teoresi Group ("Data Subjects").

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; PEC: teoresi.adm@pec.it

2. DATA PROTECTION OFFICER

Teoresi appointed a 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 to the exercise of your rights listed under point 8 of this notice, you may contact the DPO to 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.

The processing will concern the following Data:

- 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), eventual residence permit, information on school career, employment situation, specific knowledge in specific areas/fields.

Personal Data will be processed for the proper management of the candidate recruitment process, for the performance of pre-contractual activities and for the fulfilment of legal obligations to which the Data Controller is subject.

- b) "Particular" categories of personal data, as per art. 9 of the GDPR, specifically health data (strictly limited to the potential belonging to protected categories).

Processing of "particular" Data will be carried out only if strictly necessary to fulfil the obligations and exercise the Data Controller's or the data subject's specific rights with regard to labour law, social security and social protection (e.g., the right to benefits provided for by law or by the future employment contract; the right to obtain special permits, etc.). The legal bases for this processing are the compliance with a legal obligation which the controller is subject to (with specific reference to Law No 68/1999), and the execution of pre-contractual measures Data Subject is party to.

- 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 provided for by law, 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 used for the following purposes:

- research activities in human resources;
- preparation of the necessary documentation for the establishment of the employment relation or collaboration,
- fulfilment of all the obligations provided for by the law or by other binding regulations (e.g.: regulations on tax, social security and assistance, hygiene and safety at work, protection of health, public order and safety),
- manage access to the company's premises.

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.

5. NATURE OF DATA PROVISION

The provision of your personal data is mandatory as their processing is necessary for the proper and successful management of the recruitment process and to allow the Data Controller to fulfil the related legal obligations. Any refusal to provide such data makes it impossible for the Data Controller to take into account the application within the context of the recruitment process and staff evaluation.

6. PROCESSING METHODS

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).

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. The decision-making process will not be automated.

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

7. DATA RECIPIENTS

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

- the members of the board of directors and/or other corporate bodies,
- our collaborators, employees in charge of data processing, as part of their duties,
- suppliers and/or other qualified individuals who provide the Company with services or instrumental services for the management of the recruitment process (e.g. employment consultants),
- consultants who assist the Company in various ways especially with regard to legal, tax, social security, accounting and organisational aspects,
- any other subject who shall be informed on the basis of an express legal provision.
- Other Group Companies (please see art. 9)

8. 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, at least until the conclusion of the selection and recruitment process for which they were collected for. The Data

Controller may retain the Data even afterwards, if it considers that processing needs related to further recruitment purposes and future selections of the candidate continue to exist.

- In this case the retention period will not exceed 5 years, without prejudice to the right to expressly request the cancellation of the already collected data, even during the first job interview.
- 72 hours for data collected through the video surveillance system.

9. DATA PROCESSOR

Your personal data may 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, by virtue of intra-group agreements act as Data Processors, in order to fill job vacancies abroad as well. In any case, all the guarantees required by the GDPR for the protection of personal data will always be applied.

10. 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 Article 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 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 which must be mandatorily stored by the Data Controller 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 GDP occurs.

According to what is prescribed by the GDPR, 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 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.

To exercise your rights under Article 15 et seq. GDPR you may send a communication to privacy@teoresigroup.com. Your request will be processed by the Data Controller within 28 days.
