

PRIVACY NOTICE

(Pursuant to articles 19, 20 and 21 of the Federal Act on Data Protection)

INTRODUCTION

Teoresi S.A., in accordance with the applicable legislation, undertakes to process your personal data in accordance with the principles of lawfulness, fairness, good faith transparency, pertinence and necessity established by Article 6 of the New Federal Act on Data Protection (“**FADP**”).

Teoresi S.A. invites you to read the following privacy notice drawn up pursuant to Articles 19, 20 and 21 of the FADP. This privacy notice is addressed to all employees and extracurricular trainees of Teoresi S.A. (“**Data Subjects**”).

DATA CONTROLLER

The Data Controller of your data processing is Teoresi S.A., with registered office in Via Crocicchio Cortogna, 6, CP 6105 – 6901 Lugano (CH).

The contact details of the Data Controller are: Tel. +41 919104580; e-mail: privacy@teoresigroup.com.

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 identification data, such as: full name, date and place of birth, tax code, address, residence permit (if any);

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) Contact data: telephone number, e-mail address;
- c) Sensitive personal data according to art. 5 FADP:
 - health data (protected categories, occupational health, work-related injuries, sick leave..),
 - trade union membership,
 - social security and welfare data, including personal and family income status;

The processing of "special" data will be carried out only if strictly necessary to meet legal obligations with regard to labour law, including social security and social protection law (by way of example but not limited to, ensure the right to benefits to be provided by law, the right to obtain work permits and expectations for political or trade union offices, etc.).

- Criminal background data in the field of information technology (negative declaration);

The processing of "judicial" information will take place exclusively by reason of the specific function of the Data Subjects, to comply with the anti-mafia and anti-money laundering regulations as well as to comply with the ISO/IEC 27001 adopted by the Data Controller .

- a) Corporate security data: entrance and exit time;
- b) Employment and contractual data (including job performance data): curriculum vitae, performance data, disciplinary measures, training records, certification, feedbacks;
- c) Work time and attendance data;

- d) Data deriving from the use of digital assets (device ID, logs, IP address..);
- e) Tax data
- f) Banking and payroll data;
- g) Pictures and/or videos

Such data are processed for the purposes of identifying the Data Subjects within the company organization (through the use of personal badge).

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 usually required. When the authorization is acquired, all the necessary information relating to the processing at issue will be provided. 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.

PURPOSE OF THE PROCESSING

The processing of such personal data will be carried out for the proper management and execution of the business contractual relationship between the Data Controller and the Data Subject, for the fulfilment of the obligations the Data Controller is subject to.

In particular, 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 storing 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 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;
- fulfilment of any other obligation required by the law,

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 into any working relationship with you or to execute it properly.

SECURITY MEASURES

Data will be processed and collected through paper-based and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security, confidentiality, integrity and availability of the data. In particular, in carrying out the data 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, which are designed to ensure a level of protection appropriate to the risks associated with the processing of such personal data. Your Data will be likewise processed only by personnel expressly authorized by the Data Controller.

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, in compliance with the law.

Your 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 establishment 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 Data Controller in payroll processing activities),
- customers and/or suppliers (e.g. to allow access to their premises),
- other Group companies.

DATA RETENTION PERIOD

Please note that, in accordance with the principles as of in the introduction of this Privacy Notice, your data will be kept for the time necessary to achieve the purposes effectively pursued. In any case, the retention period of your personal data will not exceed 10 years.

DATA PROCESSOR

Your personal data may also be processed by third parties, which, by virtue of their appointments as Data Processors pursuant to art. 9 of the FADP, carry out on behalf of Teoresi further activities linked to the business contractual relationship.

DATA TRANSFER

The Data Controller may transfer personal data to data processors, other Group companies as well as to authorized third parties located in countries other than Switzerland. When doing so, it ensures that such transfers takes place in compliance with the applicable law, and in particular with art. 16 of the FADP, by ensuring that all recipients of personal data provide an adequate level of protection and process data only in accordance with applicable laws and our instructions.

According to the law, where needed, we will also inform you and seek your consent for such data transfers.

RIGHTS OF DATA SUBJECT

As a Data Subject, you may exercise the rights provided for by Art. 25-29 set forth in the FADP against Teoresi S.A., by sending a communication to privacy@teoresigroup.com. Limitations to the requests may apply in accordance to the applicable law.

Your request will be in any case processed by the Data Controller within 28 days.

CHANGES TO THIS NOTICE

We may update this Privacy Notice from time to time. The last version will always be available on our website at: <https://www.teoresigroup.com/privacy-notice/>.
