

TO BE PUBLISHED ON THE WEBSITE

APPLICANTS' PRIVACY POLICY

Pursuant to arts. 13 and 14 of Regulations (EU) 2017/679 (hereinafter, “**GDPR**”), **FRASCOLD S.p.A.** with registered office in Via Barbara Melzi 105- Rescaldina (Mi), Italian VAT/Tax Code no. 04629510159– Tel. +39 0331742201 - e-mail frascold@frascold.it, as **Data Controller** (hereinafter, “**FRASCOLD**” or “**Controller**”), informs you of the processing of your personal data as part of the process of recruitment, selection and evaluation of professional profiles compatible with the necessities and job opportunities of our company (hereinafter, “**Selection**”). From now on we will refer to you using the term “**Applicant**”.

1. SOURCE AND TYPE OF DATA PROCESSED

The personal data processed are those provided voluntarily by the Applicant when sending the *curriculum vitae* (and any letter of presentation) in the context of a spontaneous application or in response to specific search ads published by FRASCOLD directly (on its website and/or corporate social networks) or indirectly (on the websites/platforms of intermediaries/employment agencies) or in the context of interviews.

The Data Controller may, therefore, process the following types of data:

- a) **common personal data**, such as, by way of example: personal data, tax code, contact data, data relating to remuneration (for example, bonuses, insurance, commissions, *etc.*); data relating to training, career, role in the company (such as educational qualifications, previous work experience, promotions, performance, *etc.*) photograph(if on the CV), as well as personal data relating to family (such as marital status, family composition, *etc.*).
- b) **any particular personal data pursuant to art. 9 of the GDPR**, such as, by way of example: health data (such as, for example, membership in protected categories, disability), membership in associations or organisations of a political or trade union nature, *etc.* In this regard, it should be noted that, in the case of the spontaneous provision of particular data not inherent or indispensable in the context of the Selection and for the purposes indicated in par. 2, and therefore in order to establish the working relationship, such data are not considered in any way for the purposes of the application and are immediately deleted.
(hereinafter, collectively, the “**Personal Data**”).

2. PURPOSE OF THE PROCESSING AND LEGAL BASIS

The Personal Data are processed exclusively for the purposes and by virtue of the legal basis detailed in the table below:

| | PURPOSE | LEGAL BASIS |
|-----------|--|---|
| A. | Management of the Selection and possible establishment of the working relationship, and, in particular: <ul style="list-style-type: none">• administrative and organisational requirements (scheduling of interviews, service communications and related to the selection, feedback, <i>etc.</i>);• objective assessment of the Candidate's professional and personal requirements in relation to the possibility of inclusion in the organisational structure of FRASCOLD with reference to the job position that may be open or also to propose other | Limited to common data : Execution of pre-contractual measures adopted at the request of the data subject. Limited to particular data : Authorisation of the Supervisory Authority no. 1/2016 (of 15/12/2016) for the processing of sensitive (i.e. particular) data in employment relationships (see in particular par. 1.4.1. " <i>Processing carried out in the pre-employment phase</i> ") declared compatible with the GDPR with the Supervisory |

| | | |
|-----------|---|--|
| | types of job offers to the Applicant consistent with their training and professional profile. | Authority Provision of 13/12/2018 (no. 497 Reg. Measure). |
| B. | To assert and defend their rights, including through out-of-court initiatives and also through third parties, as well as to prevent crimes (such as, for example, fraud, identity theft, <i>etc.</i>). | Legitimate interest of the Data Controller. |
| C. | Fulfilment of a legal obligation related to civil, tax and administrative provisions, EC legislation, rules, codes or procedures approved by Authorities and other competent Institutions, as well as to respond to requests by the competent administrative or judicial authority and, more generally, by public entities in compliance with legal requirements. | Fulfilment of a legal obligation to which the Data Controller is subject. |

3. PROVISION OF DATA AND CONSEQUENCE OF REFUSAL TO PROVIDE ALL REQUIRED DATA

The lack or partial or incorrect provision of the Personal Data may result in the impossibility for FRASCOLD to consider the application in the Selection.

4. RECIPIENTS AND ANY CATEGORIES OF RECIPIENTS

In compliance with the specific purposes for which they were collected and the principles of necessity, relevance and non-excessiveness, the Personal Data may be known by the Data Controller's authorised processors (employees and collaborators).

Furthermore, the Controller may communicate them to the following categories of recipients:

- to third-party suppliers that FRASCOLD uses – appointed, if necessary, as data processors – (such as labour agencies, labour consultants, as well as companies or entities that carry out legal, accounting, *etc.*);
- to third-party companies and professionals appointed to assert the rights, interests and claims of the Data Controller arising from the relationship with the Applicant;
- to State Administrations, Judicial or Administrative Authorities, Public and Private Entities, also following inspections and audits;
- to persons who can access the data by virtue of legal provisions or secondary or EC legislation.

Only the category of recipients is indicated, since they are constantly updated. To find out the updated list of recipients, the Applicant may contact the Controller directly, by writing to the contact details set out in point 9.

5. TRANSFER OF DATA ABROAD

Within the scope of the above purposes and in particular in order to evaluate your profile, it is possible that your data will be transferred to countries belonging to the EU.

6. PROCESSING METHODS

The Personal Data will be temporarily stored in the Controller's databases and will be processed using both manual and IT tools exclusively by authorised and specifically instructed personnel.

7. STORAGE TIME OF THE PERSONAL DATA

7.1. The Personal Data will be stored by the Controller for the time strictly necessary for the purpose for which they were collected; specifically, the Controller will keep:

- Personal Data at least for the entire duration of the Selection and, after the end of the same, for a further period of 12 months
- Personal Data whose processing is necessary in relation to legal obligations, for the duration legally required;

and in any case, for the purposes indicated in par. 2, lett. B., for a maximum period equal to the limitation period of the relevant actions increased by a prudential period of six months, in order to guarantee the right of defence of FRASCOLD with reference to possible future disputes in judicial or administrative proceedings.

7.2. In all cases, once the respective terms have expired, all personal data will be deleted or made anonymous, except in the event that an employment relationship is established as a result of the Selection. In any case, the indicated terms may be extended in case of necessity in relation to the pursuit of specific purposes (e.g. labour law, administrative, accounting) or the existence of particular circumstances (such as, for example, for pending judicial or administrative disputes, pending fulfilments relevant to the termination of the relationship), or in cases where retention for a later period is required by the competent authorities or pursuant to applicable legislation.

8. RIGHTS OF THE DATA SUBJECT

8.1. The Applicant, should the circumstances exist, is entitled:

- **to object**, at any time, on grounds relating to his/her particular situation, to the processing of his/her data for the purposes set out in par. 2, lett. B;
- as well as if he/she believes that the processing of his/her personal data is in breach of the provisions of the data protection regulations, to **lodge a complaint**, pursuant to art. 77 of the GDPR, to the national supervisory authority of the member state of the European Union in which it has its habitual residence or workplace or where the alleged breach of his/her right has occurred (in the event that this State is Italy, the entity to contact is the Data Protection Authority) **or to appeal to the appropriate judicial offices** (art. 79 of the GDPR).

8.2. Furthermore, the Applicant may, at any time and free of charge, should the circumstances exist, exercise the following rights against the Controller:

- a) **Right of access** to obtain confirmation from the Controller as to whether or not personal data relating to him/her are being processed and, if so, to obtain access to such Personal Data;
- b) **Right of rectification that** allows the rectification/completion of inaccurate/incomplete personal data;
- c) **Right to erasure** that allows him/her to obtain, in the cases provided for by law, the erasure of his/her personal data processed;
- d) **Right to restriction of processing** allows you to obtain, in the cases provided for by law, the restriction (i.e. the marking of the personal data stored for the purpose of restricting its processing in the future) of the processing of your personal data;
- e) **Data Portability right:** in the event that the conditions provided for by art. 20, par. 1 lett. a) and b) GDPR by virtue of which the processing of data whose portability may be requested must be based on consent or on a contract and carried out by automated means and limited to the data provided to the Controller by the data subject, allows the data subject to receive, in a structured, commonly used and machine-readable format, the personal data concerning him or her and similarly the right to transmit such data to another data controller.

9. CONTACTS

To exercise all rights, the data subject may submit a specific request by contacting the Controller as follows:

- by mail c/o **FRASCOLD S.p.A.** to the address **Via Barbara Melzi 105- Rescaldina (Mi)**;
- by sending an e-mail to the ordinary **e-mail frascold@frascold.it**

10. AMENDMENTS

This privacy policy became effective on 12/15/2021

The Company reserves the right to amend part or all of this policy or update its content, for example as a result of changes in the applicable law. Therefore, the Company invites the User to regularly consult the policy in order to be aware of the latest updated version in order to be always informed about the way of collection and use of the Personal Data.
