



## PRIVACY NOTICE ON PERSONAL DATA PROCESSING

Pursuant to articles 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Dear **Candidate**,

exida Development S.r.l. (hereinafter referred to as the "Company") in its role of data controller of Your personal data, in accordance with articles 13 of the above-mentioned European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and with the applicable national data protection laws including decisions issued by the local Supervisory Authority, (hereinafter the "Regulation"), intends to provide You with the following information:

### 1. Identity and contact details of the data controller

The data controller is:

exida Development S.r.l, with registered office in Collettero Giacosa (TO) Italy, via Ribes n. 5 – 10010, phone number + 39 0125 1925223, represented by its Legal Representative for the time being, (hereinafter also referred to as "Data Controller").

The Data Controller is available also at the following e-mail address: [accountancy@exida-dev.com](mailto:accountancy@exida-dev.com).

### 2. Purposes for processing personal data and legal basis

Your Personal data are collected every time You complete the online application form You find on the *exida* website at the following link: [www.exida-eu.com/job](http://www.exida-eu.com/job) and /or You share personal data transmitting us Your Curriculum Vitae (CV)/resume.

When You apply for a role, you will provide Your personal data which may include name, surname, contact address and other categories of data as further specified below.

The purposes of processing Your data are to enable You to apply for job vacancies, to become part of the Company's recruitment and career process, to fulfil recruitment activities (including for example scheduling of job interviews and/or fulfilling legal rights and obligation relevant for Your application and recruitment).

The provision of personal data is necessary and is a requirement: failing this, it becomes impossible for the Company to take steps at Your request and to complete the recruitment process finalized to enter into a job agreement between You and the Company. The

processing of personal data for the above-mentioned purposes does not require a specific consent since the Data Controller is authorized to avail itself of the reliefs available under letter b) of article 6.1, of the Regulation.

### **3. Categories of personal data**

The personal data may include name, surname, e-mail address, additional contact details (for example postal address and telephone number) fiscal code number, place and date of birth, as well as information related to Your academic background, job experience and career history. The Company may ask You additional personal data, strictly related to the processing purposes set forth in point 2 of this notice and related to Your recruitment process and/or to a job offer, if that might be the case.

You may also provide the Company with personal data of other people, for example the contact information of Your previous employer. The Company may ask You this information to validate Your previous experience and/or You may have included personal data of other people in Your CV. In these cases, You will need to ask them for permission to share their personal data with the Company and for permission to let the Company use their personal data in accordance with this privacy notice.

As part of the recruitment process the Company won't ask You for special categories of personal data (for example information relating your ethnicity, religious, political or health/medical information) as defined in article 9 of the Regulation and the Company does not expect that the application submitted will include such information.

The Company may also collect Your personal data from Your referee in support of Your application, from background check information from employment screening agencies, publicly available professional profiles on website and social media. These may have their own privacy policies explaining how they collect, use and share Your personal data.

### **4. Categories of recipients of the personal data and processing methods**

The data are processed by a Company's by those natural or legal persons entrusted by the Company for the processing of personal data, generally by the human resources department/talent acquisition Team and/or by the employees and/or staff's members of the Company, who need to process them, mainly by means of electronic or manual systems and are duly trained focusing on respect of confidentiality and security system. They might be also be bounded for these purposes by special agreements with the Company. They process the data according to the principles of fairness, integrity and transparency that are required by applicable laws on data protection as well as by preserving Your privacy as data subject, through the implementation of technical and organizational measures ensuring an adequate safety level (including, without limitation, by preventing access from unauthorized persons - unless such access is required by the applicable laws - or by ensuring restoration of access to data after material or technical accidents).

In relation to the above-mentioned purposes, as already mentioned above, collecting and processing of personal data takes place through manual, IT and/or electronics methods (including data capturing software such as video surveillance cameras placed on the Company's plant or facility: specific signs, make You aware of this specific manner of processing personal data, when they visit the Company's site area): the above mention methods of collecting and

processing data are inspired by logics which aim to guarantee the safety and confidentiality of the data themselves in compliance with the Regulation.  
The existence of automated decision-making processes is excluded.

## **5. Disclosure and transfer of data to third parties**

Your personal data may be disclosed to the following categories of subjects: • job selection agencies Company's employment consultant, • audit or legal consultants, • insurance and legal institutions, • technicians for the maintenance and management of the IT system, • public authorities, Italian or foreign judicial authorities, included those persons, that are authorized by the laws. Some of these entities act as independent data controllers or as data controller acting on behalf of the Company and as such appointed by the Company in compliance with article 28 of the Regulation as processors.

In order to perform specific services implying the need of personal data processing, the Company may also avail itself of third parties, including the service of substitutive filing or maintenance on the IT systems in which data are processed. These services' companies operate as external data processors in compliance with specific and adequate directions concerning the processing methods and safety measures as specified in separate agreements between those companies and the Company. The complete and updated list of the companies acting as data processors is available on request to the contacts mentioned above under point 1.

The data may be also disclosed to other companies franchisee of exida LLC, with registered office inside and outside the European Economic Area (EEA) (the updated list is available on [www.exida-eu.com](http://www.exida-eu.com)) on whose behalf the Company carries out personnel selection activity. Personal data shall not be disseminated.

## **6. Transfer to countries outside the European Economic Area (EAA)**

In case of transfer of personal data to countries located outside the EEA, the Company undertakes to ensure a level of personal data protection, also by means of entering into specific agreements having aim to adequate the protection and the processing of personal data at the standards required by the Regulation.

## **7. Storage of data**

The data will be stored as long as it is necessary to comply with the recruitment process (whether successful or not) and the other above-mentioned purposes, unless there is a specific need of the Company for further storage in connection with its right to defend itself in front of a jurisdictional entities and authorities.

The main periods of use and storage of personal data depending on the different processing purposes are the following:

- recruitment process: 24 months from the moment You apply for the job;
- obligations depending by the applicable law: as long as applicable law requires to store the data (e.g. for 10 years and six months);
- obligations arising from professional insurance agreements the Company entered into;

## 8. The Rights of the data subjects

According to the Regulation, You as data subject have the rights listed below:

- Right to access: You may request copies of its personal data;
- Right to rectification: You have the right to obtain, that the Data Controller corrects, updates and completes any personal data You believe is inaccurate or incorrect;
- Right to erasure: You have, under certain conditions, the right to request that the Data Controller erases personal data, e.g., those data which storage is no longer necessary in relation to the purposes for which they had been collected or processed;
- Right to restriction on processing and right to objection to processing: You have the right to object to the processing or to request the limitation of the processing, for legitimate reasons and in the assumptions provided in articles 18 and 21 of the Regulation;
- Right to portability: You have the right to request that the Company transfers a copy in electronic form of the personal data that it has collected to another organization or directly to You.

For the exercise of the rights above and in case of further requests for information regarding the present privacy notice, You can contact the Data Controller by sending an email to [accountancy@exida-dev.com](mailto:accountancy@exida-dev.com) or by a registered letter to the legal address of the Company. Within 30 days of submitting the request, the Data Controller will provide You with feedback in written form also by electronic means. If You they wish to report a complaint, You may contact the Italian Supervisory Authority (Italian Data Protection Authority, based in Rome, email: [protocollo@gpdp.it](mailto:protocollo@gpdp.it)).

## 9. Changes to the notice

You and/or the above mentioned Data Subject may review this privacy notice on the website: [www.exida-eu.com/privacy-policy](http://www.exida-eu.com/privacy-policy) or request a copy using the contact details set out above at point 1.

The Data Controller may modify or update this privacy notice: You are invited to check from time to time for changes. In case changes have been made, the Data Controller will change the effective date, posting the new date at the end of this notice. Please check from time to time the date posted here below.

Should changes affect the nature of the processing or impact substantially on the protection of the data, the Data Controller will give You and/or the Data Subjects sufficient notice in order to give You and/or the Data Subjects the opportunity to exercise your rights (e.g. right to object to the processing).

Colleretto Giacosa – May 2021