

PRIVACY POLICY FOR JOB APPLICANTS PURSUANT TO PERSONAL DATA PROTECTION LEGISLATION

(Updated on 1st February 2021)

Personal Data Processing

In accordance with articles 13 and 14 of Regulation (EU) 2016/679 on the protection of personal data ("GDPR"), we hereby inform you that SINELEC S.P.A. (the "Company" or the "Controller"), in its capacity as Data Controller, processes the personal data that you provided us and the data acquired from third party sources, during the selection procedures initiated by the Company.

1. Purpose of this Privacy Policy

This privacy policy provides information concerning the nature of your personal data and subject to processing, its purposes and processing methods, any data recipients and your rights.

2. Purposes of data use

Your personal data shall be used for the selection procedures, more specifically, to check on the prerequisites for the appointment and/or to begin a collaboration and to proceed with the candidate's application.

3. Personal data to be processed

In particular, the personal data in question refers to: name, address or other personal identification details, information relating to work, social security details, the curriculum vitae containing information on education and work experience.

Potentially and exceptionally, should an employment relationship be established, and in the case that we discover that the subject falls under a protected category, additional personal data may be acquired, falling into the category of "sensitive" data pursuant to the definition under law, such as data that may reveal political opinions, membership of parties, trade unions associations or organisations of a religious, philosophical, political or trade union nature; as well as personal data that reveals a person's health status.

4. Nature of provision

The provision of data is optional, and dependant on the candidate's wishes, who has submitted their *curriculum vitae* without any soliciting from the Controller. With regards to data subsequently or eventually requested by the Controller, failure to provide said data shall render it impossible to check on the prerequisites for the selection procedure, the appointment and/or start of a collaboration, and consequently, to establish an employment relationship with the Controller.

5. Methods of data use

In addition to electronic means, the personal data may also be processed using non-automated tools. Processing is carried out solely using operations, logic and data organisational structures that are strictly necessary in relation to the aforementioned obligations, tasks or purposes.

6. Scope of data communication

Data may be utilised by the Controller's staff that has been assigned a specific role and to whom adequate operating instructions have been given to avoid any data losses, destruction, unauthorised access or unauthorised processing of the data. Your personal data shall be made available only to those within the company organisation that need to access it due to their role or hierarchical position.

Your data may also be utilised by third party data subjects that carry out instrumental activities on behalf of the Controller. The latter act in their capacity as external processors under the management and direction of the Controller. An updated list of processors can be obtained by sending a request to privacy@sinelec.it.



7. Non communication or non-dissemination of data

Your personal data will not be communicated to third party entities, nor shall the data be disseminated to unspecified data subjects.

8. Transfer of data abroad

Your personal data shall not be transferred abroad.

9. Duration of data storage

Your data shall be stored for the time required for the formalities envisaged for candidate selection, and in any case, for not more than 6 months from the time they were collected, unless an employment and/or collaboration relationship is established.

10. No need for consent

Your consent to processing is not required as the processing refers to data contained in your curriculum, which was voluntarily provided by the data subjects for the purposes of possibly establishing an employment/collaboration relationship.

11. Data Controller

The Data Controller is SINELEC S.p.A., with registered office at S.P. 211 della Lomellina 3/13 district of San Guglielmo 15057 Tortona (AL), tax identification code and VAT number 07937690019.

12. Data Protection Officer

The Company has appointed a Data Protection Officer (also known as "DPO"). The DPO can be contacted via the following email address: <u>DPO@sinelec.it</u>.

13. Exercising rights

You can, at any time, obtain full clarity regarding the operations we have referred to and, specifically, obtain the erasure, anonymisation and blocking of data processed in breach of the law, request its updating or rectification or supplementation, oppose its use, and exercise your other rights pursuant to the law. To this end, an email may be sent to privacy@sinelec.it.

We would also like to remind you that you are also entitled to lodge a complaint with the Italian Data Protection Authority if you feel that your rights have not been respected or that you have not received a response in accordance with the law.

Sinelec S.p.A.

The Data Controller