

PRIVACY NOTICE FOR CANDIDATES

In accordance with the current legislation on the protection of personal data (the "Privacy Regulations"), including EU Regulation 2016/679 (the "GDPR"), as well as Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 ("Privacy Code"), ENGRAM S.R.L., with registered office at VIA CAVOUR 11, 48018 FAENZA, VAT: 02394990390 - CF: 02394990390, the "Controller", as data controller, informs candidates (the "Data Subjects" or the "Candidates" or, singularly, the "Data Subject" or the "Candidate") who have submitted their spontaneous application through the appropriate form available on the Controller's website or to the Controller's email, that their personal data will be processed in strict compliance with the Privacy Regulations, for the purposes and in the manner described in this notice (the "Notice"). For further information regarding the processing of the personal data of Data Subjects collected during and through browsing on the Controller's website, the Controller invites Data Subjects to consult the website's privacy policy available here <https://www.egram.it/>.

1) Data Controller

The Data Controller is ENGRAM S.R.L., with registered office at VIA CAVOUR 11, 48018 FAENZA, VAT: 02394990390 - CF: 02394990390, reachable at +39 (0)546 066003 or at the following email address - info@egram.it

2) Types of Data Processed

The Controller processes the following personal data ("Personal Data") provided by the Candidate through the completion of the appropriate form available on the data controller's website as well as possibly contained in the message sent by the Candidate concurrently with the completion of the form or in the attachments uploaded therein or directly to our corporate email:

- identifying and contact information, such as: name and surname, tax code, photograph and presentation video, gender, date of birth, address or other personal identification elements; phone and email contact information;
- data relating to educational and professional background, such as: education, work experience, references, distinctions, awards, certifications.

3) Purposes and Legal Basis of Processing

The Controller informs Data Subjects that the Personal Data acquired by the data controller through the completion of the appropriate form will be processed, electronically and physically, for the following purposes ("Purposes"):

- a) to carry out recruiting and selection activities for resources and/or management of applications received through the appropriate form. In this case, the legal basis consists of the execution of pre-contractual measures adopted by the Controller at the request of the Data Subject themselves, pursuant to Article 6, paragraph 1, letter b) of the GDPR
- b) to allow the controller to exercise its rights in judicial proceedings and to suppress unlawful conduct. In this case, the legal basis for processing consists of the legitimate interest of the Controller, pursuant to Article 6, paragraph 1, letter f) of the GDPR, relating to the right of defense and exercise of its own rights or those of a third party.

If the legal basis for the processing is the legitimate interest of the Controller, the Controller guarantees to have previously carried out an assessment aimed at ensuring the proportionality of the processing so that the rights and freedoms of Data Subjects are not prejudiced, taking into account their reasonable expectations in relation to the specific processing activity. Data Subjects may request further information regarding the assessment above by sending an email to the following address: info@egram.it

The Controller also informs the Data Subject that they have the possibility to object, at any time, to the processing of their Personal Data based on the legitimate interests of the Controller.

If the Controller intends to use the Personal Data collected for any other purpose incompatible with the aforementioned Purposes for which they were originally collected or authorized, the Controller will inform the Data Subject in advance, possibly obtaining consent for the further processing of the data.

4) Nature of Data Provision

The provision of Personal Data through one's CV is not mandatory but necessary to carry out the selection process. Failure to provide the above Personal Data may therefore result in the inability of the Controller to proceed with the selection and evaluation of applications.

In any case, the Controller invites all those who intend to submit their application not to provide data of special

categories within the meaning of the GDPR (such as, merely by way of example and not exhaustively, data concerning health status, political opinions, religious beliefs, judicial data or data concerning racial and ethnic origins).

5) Data Processing Methods

In relation to the indicated Purposes, the processing of Personal Data may consist of the activities indicated by Article 4, paragraph 1, no. 2) of the GDPR, namely: collection, recording, organization, storage, consultation, processing, communication by transmission or any other form of making available, limitation, deletion, and destruction of Personal Data. The processing may be carried out using automated tools, with logic strictly related to the Purposes themselves and, in any case, in such a way as to ensure the security and confidentiality of the data, as well as compliance with the specific obligations laid down by the legislation in force from time to time.

6) Access to Data and Data Communication

The Personal Data of Data Subjects will be processed by the personnel of the Controller, specifically designated as authorized subjects for processing, where necessary for the pursuit of the Purposes referred to in the previous point 3 of this Notice.

Furthermore, the Controller informs Candidates that their Personal Data may be communicated for the pursuit of the Purposes to further recipients, specifically appointed as data processors, including, by way of example and not exhaustively:

- providers of services specifically entrusted with recruiting, selection, and personnel evaluation activities;
- IT service providers.

The complete list of recipients of the Personal Data of Data Subjects, including further details on the location of the recipients themselves, is kept at the Controller's registered office and is available upon request to be sent to the addresses indicated in the subsequent point 9 of this Notice.

The Controller also informs Candidates that their Personal Data will not be disclosed to third parties.

7) Transfer of Data outside the EU

The management and storage of data will take place on servers of the Controller located within the European Union and/or third-party companies duly appointed as data processors.

Any transfer of Data Subjects' data outside the European Union will take place only under the terms and with the guarantees provided by the Privacy Regulations and, in particular, in accordance with Articles 44 - 49 of the GDPR.

8) Data Retention Period

The Personal Data of Candidates will be retained and processed for a period not exceeding 12 (twelve) months from their collection by the Controller (the "Retention Period").

At the end of the Retention Period, the Personal Data of Candidates will be deleted, unless there are further legitimate interests of the Controller and/or legal obligations that require, after minimization, their retention.

9) Rights of Data Subjects

The Candidate, as a data subject, will always have the right, by law, to revoke any consent given, and may at any time exercise the following rights:

- a) the "right of access," specifically obtaining confirmation of the existence or otherwise of Personal Data concerning them and their communication in an intelligible form;
- b) the "right to rectification," meaning the right to request the rectification or, where interested, the integration of Personal Data;
- c) the "right to erasure," meaning the right to request erasure, anonymization, or transformation into anonymous form of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the Personal Data were collected or subsequently processed;
- d) the "right to restriction of processing," meaning the right to obtain from the Controller restriction of processing in certain cases provided for by the Privacy Regulations;
- e) the right to request from the Controller an indication of the recipients to whom it has communicated any rectifications, erasures, or restrictions on processing (made in accordance with Articles 16, 17, and 18 GDPR, in compliance with the notification obligation, except where this proves impossible or involves a disproportionate effort);
- f) the "right to data portability," meaning the right to receive (or to transmit directly to another controller) Personal Data in a structured, commonly used, and machine-readable format;
- g) the "right to object," meaning the right to object, in whole or in part:

- to the processing of Personal Data carried out by the Controller for its legitimate interests;
- to the processing of Personal Data carried out by the Controller for marketing or profiling purposes.

In the above cases, where necessary, the Controller will inform the recipients to whom the Data Subjects' Personal Data are communicated of any exercise of rights, except in specific cases where this is not possible or is too burdensome and, in any case, in accordance with what is provided by the Privacy Regulations. Where processing is based on consent, the Data Subject will also have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

10) Exercise of Rights and Complaint to the Privacy Authority

The Data Subject may exercise their rights at any time in the following ways:

- via email, at the address: info@engram.it
- by ordinary mail, to the address of the registered office of ENGRAM S.R.L., VIA CAVOUR 11, 48018 FAENZA,.

The Controller informs the Data Subject that, under the Privacy Regulations, they have the right to lodge a complaint with the competent supervisory authority (particularly in the Member State of their habitual residence, place of work, or place of the alleged violation) if they believe that their Personal Data is being processed in a manner that violates the GDPR. In order to facilitate the exercise of the right to lodge a complaint, the following link provides the name and contact details of the supervisory authorities of the European Union:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Finally, if the Data Subject intends to lodge a complaint with the competent supervisory authority for the Italian territory (i.e., the Garante Authority for the protection of personal data), the complaint form is available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.