

PRIVACY NOTICE – CANDIDATES

This privacy notice (“**Notice**”) describes how C.M.C. S.p.A. (hereinafter, “**C.M.C.**” or “**Data Controller**”) processes the personal data of its candidates, Controller”) collected during the recruitment process, in compliance with the Regulation (EU) 2016/679 (“**GDPR**”), the Italian Legislative Decree 196/2003 as further amended, the relevant measures and guidelines of the national and European data protection authorities, as well as the applicable national and European laws and regulations (jointly, the “**Applicable Law**”).

1. Contact details of the Data Controller

The Data Controller is C.M.C. S.p.A., with registered office at via Carlo Marx, 13/C, 06012, Città di Castello (PG), Italy, tax code and VAT number 02969060546.

For any request relating to your personal data processing, you can contact us by sending a letter by mail to our registered office or an e-mail to privacy@cmcsolutions.com.

2. Categories of data processed

C.M.C. will process the following categories of personal data, for the purposes and according to the legal basis mentioned under point 3 below:

- (i) Common personal data, such as identification data (e.g. first and last name, gender, date and place of birth, identification document, social security number, address), contact data (e.g. telephone number, e-mail address), employment data (e.g., qualification, professional path, skills, and soft skills), economic data (e.g. current salary), photo where provided by you when submitting your resume.
- (ii) Special categories of personal data, C.M.C. does not intentionally collect special categories of personal data (i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation) and invites you not to provide such data and/or information from which they could be inferred.

If provided, the data referred to in no. (ii) above will be processed only where necessary to enable you to participate in the recruitment process and to guarantee your statutory rights in the field of labor law and social security and protection in accordance with the provisions of the Applicable Law, refraining from any processing that is not strictly necessary.

3. Purposes and legal basis of processing

C.M.C. will process the personal data referred to in point 2 above for the purposes and under the legal basis described below.

a) Management of pre-contractual requests

Your personal data will be processed for the assessment of your profile, aptitudes and skills as part of our recruitment process.

Your personal data will be processed as necessary for the execution of pre-contractual measures taken at your request (art. 6(1)(b) GDPR). Such processing is necessary and if you fail to provide the personal data, it will not be possible to assess your profile for the purposes of the recruitment process.

b) Compliance with a legal obligation to which the Data Controller is subject

Your personal data will be processed in order to fulfill the legal obligations set forth by laws, regulations, collective bargaining agreements, and, in general, by the relevant legislation applicable from time to time.

Your personal data will be processed to the extent necessary to fulfill a legal obligation to which the Data Controller is subject (art. 6(1)(c), GDPR). Such processing is necessary and if you fail to provide

the personal data, it will not be possible to assess your profile for the purposes of the recruitment process.

c) Pursuit of the Data Controller's legitimate interest

Your personal data will be processed to:

- (i) carry out special corporate transactions involving C.M.C. (including mergers, acquisitions, transfers, corporate reorganizations and restructuring);
- (ii) ascertain, exercise or defend a right of C.M.C. and/or its employees, in and/or out of court.

Your personal data will be processed as necessary for the pursuit of the legitimate interest of the Data Controller or third parties (art. 6(1)(f) GDPR). If you fail to provide the personal data, it will not be possible to establish the employment relationship and/or its proper continuation.

For further information on the legitimate interests pursued and the relevant balancing tests conducted by C.M.C., you can contact the Data Controller at the addresses provided in this Notice.

4. Methods, time and place of processing

Your personal data may be processed in electronic or paper mode, in such a way as to guarantee its security and confidentiality in accordance with the provisions of the Applicable Law.

The data will be stored in Data Controller's headquarter and in the archives of the Data Controller's IT suppliers.

Your personal data will be stored for a period of time not exceeding 12 months from the end of the recruitment process – unless it is necessary to store it longer in order to comply with a legal obligation, an order of an Authority or to defend a right of the Data Controller.

At the end of the mentioned retention period, your personal data will be deleted or made anonymous.

5. Persons or categories of persons to which the personal data may be communicated or which may know your personal data

For the purposes under point 3 of this Notice, the data you provide may be processed by the following categories of recipients:

- a. authorized C.M.C. personnel, who received specific instructions for the processing operations described in this Notice;
- b. third parties which carry out activities connected or instrumental to the activity of C.M.C., which shall act as data processors (such as, for example, suppliers responsible for the maintenance and development of the IT systems);
- a. third parties which carry out activities related to or instrumental to the activity of the Data Controller, which will act as data controllers (such as, by way of example only, public administrations – Inps, Inail, Provincial Directorate of Labor – insurance companies, banks, pension funds and welfare funds – including private ones –, trade unions, professionals, legal and / or tax consultants, companies involved in special corporate transactions), as well as independent authorities and judicial and/or administrative authorities for their institutional purposes to the extent permitted by law.

The list of recipients of your data is available upon request, by writing to the Data Controller at the contact details indicated in this Notice.

Personal data will not be disseminated.

6. Transfer of data outside the European Economic Area

Insofar as this is necessary for the pursuit of the purposes set out in point 3 above, your personal data may be transferred outside the European Economic Area ("EEA").

Whenever personal data is transferred outside the EEA and, in particular, to countries that do not benefit from an adequacy decision of the European Commission, we will adopt one of the safeguards set out in the Applicable Law, e.g. we will sign the standard contractual clauses adopted by the European Commission, keeping them up-to-date, and we will take any other appropriate technical, organisational and/or contractual measures to ensure a level of protection for the personal data that is adequate and, in any event, essentially equivalent to the level of protection guaranteed within the EEA.

The list of countries outside the EEA to which we may transfer your personal data is available upon request by contacting the Data Controller at the contact details provided in this Notice

7. Your rights

To the extent that they are applicable to the processing described in this Notice, you can exercise the rights under articles 15 et seq. of the GDPR:

- a) Right of access (art. 15 of the GDPR): the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and if so, to obtain access to the personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients in third countries or international organizations; (iv) when possible, the envisaged retention period of the personal data or, if not possible, the criteria used to determine this period; (v) the right to lodge a complaint with a supervisory authority; (vi) if personal data are not collected from you, all available information on their origin; (vii) the existence of automated decision-making, including profiling, as well as meaningful information on the logic used and the expected consequences of such processing;
- b) Right of rectification (art. 16 of the GDPR): the right to obtain the rectification of inaccurate personal data concerning you without undue delay as well as, taking into account the purposes of the processing, the right to obtain the integration of incomplete personal data, including by providing a supplementary statement. Also, for this purpose, we remind you that you wish to notify the Data Controller, using the contact details indicated in this Notice, of any change and/or update of the personal data processed always in accordance with this Notice;
- c) Right of erasure (so-called right to be forgotten, art. 17 of the GDPR): the right to obtain the deletion of personal data concerning you where one of the following grounds applies: (i) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (ii) the personal data is being processed unlawfully; (iii) you have withdrawn the consent under which the Data Controller had the right to process your personal data and there is no other legal basis for the Data Controller to process it; (iv) you have objected to the processing activity and there is no overriding legitimate grounds for the data processing; (v) the personal data must be erased to fulfill a legal obligation. However, C.M.C. has the right to disregard the exercise of the rights of erasure in the event that this is necessary for the compliance with a legal obligation or for the establishment, exercise or defence of legal claims;
- d) Right to restriction of processing (art. 18 of the GDPR): the right to obtain from the Data Controller the restriction of processing when one of the following applies: (i) if you have contested the accuracy of personal data concerning you, for the period necessary for the Data Controller to verify the accuracy of such personal data; (ii) in case of unlawful processing of your personal data, if you object to its erasure; (iii) the Data Controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; (iv) for the period necessary for the verification as to whether the legitimate reasons of the Data Controller prevail over your

request to object to the processing;

- e) Right to data portability (art. 20 of the GDPR): the right to receive in a structured, commonly used and machine-readable format your personal data provided to the Data Controller and processed by the Data Controller based on your consent or a contract with you, as well as the right to transmit such personal data to another data controller without hindrance;
- f) Right to object (art. 21 of the GDPR): the right to object at any time, for reasons related to your particular situation, to the processing of personal data carried out on the basis of the legitimate interest of the Data Controller. This is without prejudice to the possibility for the Data Controller to continue the processing by demonstrating the existence of compelling legitimate reasons that override the interests, rights and freedoms of the data subject;
- g) Right to withdraw consent (art. 7 of the GDPR): the right to withdraw, at any time, a consent that may have been given. Such withdrawal shall not affect the lawfulness of the processing based on the consent given prior to the withdrawal;
- h) Right to lodge a complaint before the competent Data Protection Authority and/or right to an effective judicial remedy against a supervisory authority.

The above listed rights may be exercised at any time by sending a letter by mail to our registered office, or by e-mail to privacy@cmcsolutions.com.

8. Changes and updates to the Notice

This Notice may be subsequently amended or updated. This version is dated **November 2022**.